Quality Payment Program Update and ? Future

BRAD JOHNSON, MD
PROFESSOR OF SURGERY
Financial Disclosure

- I have nothing to disclose
Mission of SVS Quality Performance and Measures Committee

- SVS Member education - Webinars and SVS articles
- Coordination of future measure development with VQI
- Respond to CMS proposals
- Prepare for the future - Episode-Based Cost Measure Development for the Quality Payment Program
  APMs
Agenda

► SVS response to 2018 CMS Proposal and what happen
► Future?
► Questions and discussion
Academic Practices

The SVS believes this is a fundamental and very important element of the Quality Payment Program under MACRA and that a method for sub-group reporting must be created such that specialty-specific sub-groups under a larger TIN can be identified and allowed to report specialty-relevant MIPS measures.

**Division of Vascular Surgery can report separately from Practice Plan as a "Virtual Group"**
Top out Measures

A. Topped-out measures will be removed and scored on 4 year phasing out timeline.

B. Topped out measures with measure benchmarks that have been topped out for at least 2 consecutive years will earn up to 7 points.

C. The 7-point scoring policy for 6 topped out measures identified for the 2018 performance period is finalized. These 6 topped out measures include the following:

   Perioperative Care: Selection of Prophylactic Antibiotic-First or Second Generation Cephalosporin. (Quality Measure ID: 21)

   Melanoma: Overutilization of Imaging Studies in Melanoma. (Quality Measure ID: 224)

   Perioperative Care: Venous Thromboembolism (VTE) Prophylaxis (When Indicated in ALL Patients). (Quality Measure ID: 23)
Costs vs Quality

- COSTS-0% in 2019 payment year
- Finalized at 10% in 2020 payment year.
- 30% in 2021 MIPS payment year and beyond.

- QUALITY-60% in 2019 payment year.
- • 50% in 2020 payment year.
- • 30% in 2021 payment year and beyond.
Wave 2 of the Clinical Subcommittees for Episode-Based Cost Measures: Peripheral Vascular Disease Management

- Wave 1 Chronic LE revascularization - finalized - Evan Lipitiz, MD from SVS was co-chair
- Wave 2 Hemodialysis Access - being developed with our input
Pick Your Pace

- CMS provide “Pick Your Pace” options in 2018 similar to what the agency did for MIPS in 2017 that will help virtual groups avoid penalties.
We believe bonus points should be awarded in recognition of physicians who treat the sickest patients with the most complex diseases, those are unfortunately but often accompanied by devastating complications. For vascular surgeons, the relevant categories of patient would include those with severe peripheral vascular disease causing critical limb ischemia, and those patients with acute, life-threatening aortic pathology.

Clinicians can earn up to 5 bonus points for the treatment of complex patients (based on a combination of the Hierarchical Condition Categories (HCCs) and the number of dually eligible patients treated).
We believe that for those newly-enrolled eligible clinicians (vascular surgery graduates) who bill their first Medicare patient after September 1 of a given year, they should be exempt from MIPS reporting for the entire next calendar year.
Automated Data Abstraction? Billion dollar cost question

A. PCPI-standardization of terminology across all databases and EHR.
CMS will not do this so they will attempt

b. Medstreaming pilot projects- Ray Graham
RAPID- Registry Assessment of Peripheral Interventional Devices (RAPID)

- Principal Investigators:
  Pablo Morales, MD, FDA
  Robert Thatcher, 4C Medical Technologies
  Jack Cronenwett, MD, Society for Vascular Surgery (SVS), Vascular Quality Initiative (VQI)

- The Registry Assessment of Peripheral Interventional Devices (RAPID) project emerged from the Predictable And SuStainable Implementation Of National (PASSION) Registries for Cardiovascular Devices program of the Medical Device Epidemiology Network (MDEpiNet), a public-private partnership supported by the U.S. FDA to advance the nation’s approaches to the evaluation of medical devices
VQI remain a QCDR?
SVS APM Ad hoc Committee

Chair – Yazan Duwayri, MD,

QPMC
Robert Larson, MD
Patrick Ryan, MD
Karen Woo, MD

Government Relations
Matthew Mell, MD
Reagan Quan, MD
Megan Tracci, MD
Willaim Shutze, MD

Coding
Francesco Aiello, MD
Matthew Sideman, MD
Bob Zwolak, MD

Clinical Practice
Mark Davies, MD
Natalia Glebova, MD
Ying Wei Lum, MD

Community Practice
John Adams, MD
Daniel McDevitt, MD
Cost Category will increase to 30% by 2021

- CMS developing **Episode-based resource use measures**
- CMS encouraging **APM** development to promote quality and control cost
Cost Data

- At the very least, CMS must produce quarterly reports on a physician’s resource use/cost information compared to other MIPS Eligible Professionals since the information is based on claims’ submission. CMS also needs to devote the necessary resources, including dedicated CMS staff, to help physicians and administrators interpret the feedback reports.

- **Understandable feedback more often on costs**
Future?
MIPS Proposed Timeline for 2019 Payment

Why I should care NOW

PERFORMANCE YEAR

SUBMIT DATA

FEEDBACK AVAILABLE

PAYMENT ADJUSTMENT

JANUARY 1 – DECEMBER 31, 2017

MARCH 31, 2018

JANUARY 1, 2019

What you do today, will impact your payment in 2019!
VQI Participants are the Silverbacks
Deming

85/15 rule- Your system is responsible for 85% of your problems and 15% is due to your personnel

VQI is a good system that provides value and controls cost
Preparing Your Practice for Medicare’s New Quality Payment Program: Quality Reporting Made Easy

Q&A Town Hall Webinars
Learn More About Medicare Reimbursement, Effect on Practices

Times are 1 p.m. Eastern Time, Tuesday, Sept. 12, and 7 p.m. Eastern Time, Tuesday, Sept. 19. Moderators are Jill Rathbun and Drs. Michael Stoner and Caitlin Hicks of SVS’ Quality and Performance Measures Committee

Does everybody get the “SVS Pulse” email?
CMS Quality Program Website

https://qpp.cms.gov/about/resource-library
Similar Sized Society PACs – 2013-14

- American Assn of Neurological Surgeons: $414,402
- Society For Radiation Oncology: $323,098
- SVS: $210,100
Cost measurement and payment implications of the Medicare Access to Rights and Accountability in Services and Treatment (MARRAST) Program

Yazan Duwayri, MD, a Brad Johnson, MD, b Jill Rathbun, MHSA, c and Karen E. Kwan, MD, a

Tampa, Fla; Chicago, Ill; and Los Angeles, Calif

Healthcare cost disparities created by the traditional fee-for-service payment model have been the primary factors leading to the development of the Quality Pay-ment System (QPS) in the United States. The QPS was designed to improve the quality of care and reduce costs by spurring preventive care and early intervention. The QPS is a comprehensive system that incorporates advanced technology, innovative measures, and rigorous evaluation of outcomes. The QPS is expected to have a significant impact on patient care, healthcare costs, and overall quality of life. This article discusses the implications of the QPS on healthcare systems and how it can be used to address the challenges of healthcare cost disparities.
Questions?

- How many people are participating in MIPS?
- Entire year?
- Using VQI to report?
- Any idea how much bonus/penalty may be? USF Academic practice plan estimates $2 million bonus
Any hope for this insane surgeon?
Sanity Surgeons

Karen Woo, MD UCLA

Yaz Duwayri, MD Emory Uni.
Recipient, Julius H. Jacobson II Award for Physician Excellence

Initiated the first five-year residency program for vascular surgery training.

Organized the Vascular Study Group of New England (VSGNE) regional consortium

Jack Cronenwett, MD
United States Air Force Academy and Duke University Medical School.
Harvard Medical School-Vascular Surgery Fellowship
Mayo Clinic - founding member of the Mayo Vascular Center and
Associate Dean for Faculty Affairs.

Alaskan Kongakut River Rat
MACRA - Impact on a Vascular Surgeon’s Sanity
Working to Prepare for MACRA

SVS President

SVS Executive Committee

QPMC

Governance

Coding
Starting in 2017, physicians will have to choose to

Stand in Place (and lose money)

MIPS

APMs
Impact to a Vascular Surgeon’s Practice: Tools for SVS Members

- MIPS-overview and update
- MIPS- impact on private, academic, and hospital employed vascular surgeons
- QPMC working with VQI on future measure development
- ?what will MACRA look like in 2025
How are SVS members meeting reporting requirements?

Vascular Quality Initiative® vs. ECG Management Consultants

Deloitte.
“MACRA is a game-changer. It was designed to disrupt our health care system at all levels. And it’s doing just that: MACRA is already creating strategic discussions around new care, payment, and delivery models. In this case – and especially given the tight deadline – it is time for all to hop on this fast moving highway.”

Anne Phelps, Principal, US Health Care Regulatory Leader, Deloitte & Touche LLP
# Timeline

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<td>Clinical Practice Improvement Activities</td>
<td>4%</td>
<td>5%</td>
<td>7%</td>
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<td>Meaningful Use of Certified EHR Technology</td>
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<td>PQRS, Value Modifier, EHR Incentives</td>
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<td><strong>Certain APMs</strong></td>
<td>Qualifying APM Participant</td>
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<td><strong>5% Incentive Payment</strong></td>
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*Qualifying APM conversion factor  
**Non-qualifying APM conversion factor
MIPS Reporting

- First MIPS reporting period begins on January 1, 2017 and runs through December 31, 2017.
- MIPS Eligible Clinicians: Physicians, PAs, NPs, CMS, CRNA
- For applicable clinicians, 2017 MIPS performance will determine payment increases/penalties for the 2019 Payment Year.
- Maximum MIPS negative payment adjustment will be -4% for 2019.
- Three major categories of exempted physicians:

  - Are newly enrolled in Medicare;
  - Have less than or equal to $10,000 in Medicare charges and less than or equal to 100 Medicare patients; or
  - Are significantly participating in an Advanced Alternative Payment Model (APM).
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<tr>
<td><strong>Quality</strong> (replaces PQRS)</td>
<td>60% of the total score in year 1 (Decreases to 50% in 2018; 30% in 2019 and thereafter)</td>
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<td><strong>Advancing Care Information (ACI)</strong> (replaces EHR Meaningful Use)</td>
<td>25% of the total score in year 1</td>
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<td><strong>Improvement Activities</strong> (new)</td>
<td>15% of the total score in year 1</td>
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<tr>
<td><strong>Cost</strong> (based on claims data)</td>
<td>0% of the total score in year 1 (Increases to 10% in 2018; 30% in 2019 and thereafter)</td>
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Clinicians choose six measures to report to CMS that best reflect their practice.

Participating in VQI meets the Quality requirement.
25% Advancing Care Information:

- Clinicians will report key measures of interoperability and information exchange.
- Clinicians are rewarded for their performance on measures that matter most to them. 100 points
25% Advancing Care Information:

- Clinicians will report key measures of interoperability and information exchange.
- Clinicians are rewarded for their performance on measures that matter most to them. 100 points
- What mechanism will we use to keep track of these measures in our practice and how will we report them?
15% Clinical Practice Improvement Activities:

- Clinicians can choose the activities best suited for their practice
- Proposes over 90 activities from which to choose.
Clinicians can choose the activities best suited for their practice.

Proposes over 90 activities from which to choose.

How do we track and report these activities?
0% Cost:

- CMS will calculate these measures based on claims and availability of sufficient volume. Clinicians do not need to report anything.

- Average score of all resource measures that can be attributed.
0% Cost:

- CMS will calculate these measures based on claims and availability of sufficient volume. Clinicians do not need to report anything.
- Average score of all resource measures that can be attributed.
- Will CMS tell each Vascular Surgeon what this value is for them?
Ideas for MIPS using VQI Data

- Identify Quality Improvement Projects for your Center
- Request National Blinded Data Sets to research specific questions
- Support Certifications
- Utilize data to understand practice variation using different devices or techniques
- VQI is a specialty registry
<table>
<thead>
<tr>
<th>Measure Title</th>
<th>NQF</th>
<th>PQRS</th>
<th>Measure Description</th>
<th>NQS Domain</th>
<th>Measure Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Statin Therapy at Discharge after Lower Extremity Bypass (LEB)</td>
<td>1519</td>
<td>257</td>
<td>Percentage of patients aged 18 years and older undergoing infra-inguinal lower extremity bypass who are prescribed a statin medication at discharge.</td>
<td>Effective Clinical Care</td>
<td>Process</td>
</tr>
<tr>
<td>Rate of Open Repair of Small or Moderate Non-Ruptured Abdominal Aortic Aneurysms (AAA) without Major Complications [Discharged to Home by Post-Operative Day #7]</td>
<td>N/A</td>
<td>258</td>
<td>Percent of patients undergoing open repair of small or moderate sized non-ruptured abdominal aortic aneurysms who do not experience a major complication (discharge to home no later than post-operative day #7).</td>
<td>Patient Safety</td>
<td>Outcome</td>
</tr>
<tr>
<td>Rate of Endovascular Aneurysm Repair (EVAR) of Small or Moderate Non-Ruptured Abdominal Aortic Aneurysms (AAA) without Major Complications [Discharged to Home by Post-Operative Day #2]</td>
<td>N/A</td>
<td>259</td>
<td>Percent of patients undergoing endovascular repair of small or moderate non-ruptured abdominal aortic aneurysms (AAA) that do not experience a major complication (discharged to home no later than post-operative day #2)</td>
<td>Patient Safety</td>
<td>Outcome</td>
</tr>
<tr>
<td>Rate of Carotid Endarterectomy (CEA) for Asymptomatic Patients, without Major Complications [Discharged to Home by Post-Operative Day #2]</td>
<td>N/A</td>
<td>260</td>
<td>Percent of asymptomatic patients undergoing CEA who are discharged to home no later than post-operative day #2.</td>
<td>Patient Safety</td>
<td>Outcome</td>
</tr>
<tr>
<td>Rate of Carotid Artery Stenting (CAS) for Asymptomatic Patients, Without Major Complications [Discharged to Home by Post-Operative Day #2]</td>
<td>N/A</td>
<td>344</td>
<td>Percent of asymptomatic patients undergoing CAS who are discharged to home no later than post-operative day #2.</td>
<td>Effective Clinical Care</td>
<td>Outcome</td>
</tr>
<tr>
<td>Rate of Postoperative Stroke or Death in Asymptomatic Patients Undergoing Carotid Artery Stenting (CAS)</td>
<td>1543</td>
<td>345</td>
<td>Percent of asymptomatic patients undergoing CAS who experience stroke or death following surgery while in the hospital.</td>
<td>Effective Clinical Care</td>
<td>Outcome</td>
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<tr>
<td>Rate of Postoperative Stroke or Death in Asymptomatic Patients Undergoing Carotid Endarterectomy (CEA)</td>
<td>1540</td>
<td>346</td>
<td>Percent of asymptomatic patients undergoing CEA who experience stroke or death following surgery while in the hospital.</td>
<td>Effective Clinical Care</td>
<td>Outcome</td>
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<tr>
<td>Rate of Endovascular Aneurysm Repair (EVAR) of Small or Moderate Non-Ruptured Abdominal Aortic Aneurysms (AAA) Who Die While in Hospital</td>
<td>1534</td>
<td>347</td>
<td>Percent of patients undergoing endovascular repair of small or moderate abdominal aortic aneurysms (AAA) who die while in the hospital.</td>
<td>Patient Safety</td>
<td>Outcome</td>
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<tr>
<td>Rate of Open Repair of Ascending Abdominal Aortic Aneurysms (AAA) Where Patients Are Discharged Alive</td>
<td>1523</td>
<td>417</td>
<td>Percentage of patients undergoing open repair of abdominal aortic aneurysms (AAA) who are discharged alive.</td>
<td>Patient Safety</td>
<td>Outcome</td>
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<td>Perioperative Anti-platelet Therapy for Patients Undergoing Carotid Endarterectomy</td>
<td>0465</td>
<td>423</td>
<td>Percentage of patients undergoing carotid endarterectomy (CEA) who are taking an anti-platelet agent (aspirin or clopidogrel or equivalent such as aggrenox/tiglacor, etc.) within 48 hours prior to surgery and are prescribed this medication at hospital discharge following surgery.</td>
<td>Effective Clinical Care</td>
<td>Process</td>
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## MIPS Reporting Submission Options

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<thead>
<tr>
<th>MIPS Category</th>
<th>Available Reporting Mechanisms</th>
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<tr>
<td><strong>Quality of Care</strong></td>
<td>Qualified Clinical Data Registry (QCDR)</td>
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<td>Electronic Health Record</td>
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<td>Claims Data</td>
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<td><strong>Resource Use</strong></td>
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Qualified Clinical Data Registry (QCDR) = Vascular Quality Initiative (VQI) Database
Reporting Options

Group Practice

- Qualified QCDR registry=VQI
- Web interface (for groups of 25+ only)
- Direct EHR using CEHRT
- CEHRT via data submission vendor
- Consumer Assessment of Healthcare Providers and Systems (CAHPS) for PQRS via CMS-certified survey vendor (for group practices of 2+)
How is VQI a part of the tools and solutions for SVS members

- Qualified Clinical Data Registry = VQI
- VQI/M2S, Inc. is an approved Qualified Registry vendor.
- Submission of Quality measures from 2017 to CMS for the 2019 requirement. In 2014 for this service, M2S charged a fee of $349 per participating physician at the time of submission.
- Designed by physicians
- Risk-adjusted benchmarking
- One year follow-up
- Cases audited against claims data
- Center and physician-level reports
- Detailed clinical data
Quality

Advancing Care

Practice Improvements
Outcomes reported by the Vascular Quality Initiative and the National Surgical Quality Improvement Program are not comparable

Francesco A. Aiello, MD, Bing Shuc, MD, Nisha Kinid, MBBSe, MPH, Amy Rosen, PhD, Louis Messina, MD, William Robinson, MD, Philimon Gona, PhD, and Andres Schanzer, MD, Worcester, Mass

Objective: The Vascular Quality Initiative (VQI) and National Surgical Quality Improvement Program (NSQIP) have emerged as the primary vascular surgery quality measurement tools with the purpose of evaluating perioperative outcomes and assessing hospital and physician quality. VQI uses self-reporting to capture all index vascular procedures during the inpatient period. NSQIP employs nurse abstractors to capture a sample of procedures and covers 30-day events. We hypothesize that patients undergoing lower extremity bypass (LEB) will exhibit high concordance for preoperative variables and low concordance for postoperative variables between these data sets.

Methods: All patients undergoing LEB for peripheral arterial disease at the University of Massachusetts captured in both VQI and NSQIP databases were reviewed (2007-2012). Concordance between categorical variables was assessed by $\kappa$ correlation coefficient. All postoperative variables were compared during equivalent inpatient stay. Events between discharge and 30 days postoperatively were tabulated with use of the NSQIP data set.

Results: We identified 240 patients undergoing LEB captured in both VQI and NSQIP. Comparison of this identical patient cohort between VQI and NSQIP revealed a moderate to strong agreement for most preoperative variables except for congestive heart failure ($\kappa = 0.14$) and hypertension ($\kappa = 0.35$), which showed poor agreement. Concordance for inpatient postoperative variables was high for mortality ($\kappa = 1.0$) and myocardial infarction ($\kappa = 0.86$) but moderate for pulmonary complications ($\kappa = 0.57$) and poor for unplanned return to the operating room ($\kappa = 0.41$), wound infection ($\kappa = -0.01$), and change in renal function ($\kappa = -0.01$). A majority of postoperative events (71%) occurred between discharge and 30 days postoperatively, with a significantly higher incidence of wound infections in the outpatient setting (4.2% vs 98.5%, $P < .0001$).

Conclusions: VQI and NSQIP demonstrate substantial concordance for most preoperative variables and poor concordance for most postoperative variables, even at identical collection periods. This discordance is a result of differences in data collection methods and variable definitions. On the basis of these findings, VQI and NSQIP data sets cannot be used to directly compare risk-adjusted patient outcomes between institutions. (J Vasc Surg 2014;:1-8.)
Clinical Practice Improvement Activities:

Regional Quality Groups Enhance Effectiveness of Vascular Quality Initiative®.

Dunn J¹, Weaver FA, Woo K.

¹Division of Vascular Surgery and Endovascular Therapy, Keck School of Medicine, University of Southern California, Los Angeles, California, USA.

Abstract

The Vascular Quality Initiative (VQI)® is a national collaborative of regional quality groups that collect and analyze data to improve vascular health care. The Southern California Vascular Outcomes Improvement Collaborative (So Cal VOICe) is the regional quality group for southern California. Initial quality initiatives chosen by the So Cal VOICe are preoperative and discharge antiplatelet and statin therapy and vascular access guidance during percutaneous endovascular procedures. The objective of this study is to examine the influence of the regional quality group structure on the effectiveness of the So Cal VOICe. Data are entered by each institution into a cloud-based data collection and reporting system. So Cal VOICe data from January 2011 to July 2014 was analyzed in 6-month intervals. Preoperative statin and antiplatelet use increased from 58.87 to 71.81 per cent (P = 0.0082) and 60.8 to 78.38 per cent (P < 0.0001), respectively. Discharge statin and antiplatelet use increased from 69.09 to 80.37 per cent (P = 0.0037) and 80.47 to 88.11 per cent (P = 0.0148), respectively. Vascular access guidance improved from 32.89 to 76.23 per cent (P < 0.0001). Our results demonstrate the unique regional quality group structure of the VQI® improves compliance with selected process measures in the So Cal VOICe. Continued data collection will determine the impact of these process improvements on long-term patient outcomes.
Pathways for Different Vascular Surgery Practices for MIPS

- Private
- Academic
- Hospital employed
Private vascular surgery groups are in the best position because they control their costs, data, and patients.
Implementation: Academic practice

What data will you report, VQI or NSQIP?
Report as Division of Vascular Surgery or part of Practice group?
Could that change whether you receive bonus or penalty?
Who decides how funds are distributed?
Money in Merit Incentive Payment System (MIPS)

- Sliding Scale for bonus and penalty
- Congress allocated half billion for Special extra bonus (up to 25%) for high performers (2019 – 2024)
- 2019 - +/- 4%, 2020 - +/- 5%, 2021 - +/- 7%, 2022 and beyond - +/- 9%
- 4 Vascular Surgeons at TGH

**4% x 1,750,000 = $70,000 bonus for our group**

**25% x 1,750,000 = $437,5000**

Only 51% of physicians reporting currently. Expect only 28% to report full calendar year in 2017
Practice Leaders decided to fully participate for the entire year and report as a group.

Included one vascular measure. May include more next year since they like VQI.

USF Practice Plan estimates 2 million bonus or loss.

We are playing the game!
How to find out who is responsible and how to ensure quality reporting if you are a hospital-employed physician

- Most Vascular Surgeons unsure, waiting for SVS to tell them what to do.
- Meet with your Chief Medical Office and Hospital CEO.
  - Can I participate in VQI?
  - Will you pay the annual fee and hire an abstractor to manage my data?
  - Hire a consultant?
  - Who pays the penalty or receives the bonus?
The role of clinical practice guidelines and how SVS guidelines will help when APMs arrive

- 2011 ASA/ACCF/AHA/AANN/AANS/ACR/ASNR/CNS/SAIP/SCAI/SIR/SNIS/SVM/SVS Guideline on the Management of Patients With Extracranial Carotid and Vertebral Artery Disease: Executive Summary

- Guidelines along with claims data will allow Vascular Surgeons to develop Alternative Payment Models (APMs) for each vascular disease.

- CMS especially likes guidelines that cross multiple specialties
The vascular surgeon’s roadmap to success in the Quality Payment Program

Yazan Duwayri, MD, Brad Johnson, MD, Jill Rathbun, MHSA, and Karen Woo, MD, Atlanta, Ga; Tampa, Fla; Chicago, Ill; and Los Angeles, Calif

MIPS: Clinical Practice Improvement Activities

Rocco G. Ciocca, MD, Brad Johnson MD, Jill Rathbun, MHSA, Karen Woo MD

Medicare’s new quality payment program for physicians: An overview

Karen Woo, MD, Jill Rathbun, MD, and Brad Johnson, MD, Los Angeles, Calif; Chicago, Ill; and Tampa, Fla

Utilizing registries to meet Medicare reimbursement requirements

Ash Mansour, Brad Johnson, Jill Rathbun, Karen Woo
PSO National QI Project Committee Process

SVS PSO
- Identify high performing centers
- Provide input to/from regional meetings
- Develop educational resources
- Develop COPI and Physician Reports

- Align with MIPS/MACRA
  - Track successes

Arterial Quality Committee
- Goals, measures, definitions, benchmarks
- Analysis of results
- QI bundles (recommended clinical practices)
- Outcomes of interest to payers, administrators
- Recommended practices

Communications Committee
- Messaging to key stakeholders (providers, patients, administrators)
- Oversight of articles, press releases
- Physician and hospital engagement

Quality Improvement Workgroup
- QI implementation tools
- ‘How-To’ presentations
- Expert guidance for user groups

Vascular Quality Initiative®
April 24, 2017
Acumen, LLC
On behalf of the Centers for Medicare & Medicaid Services
Re: Comments on the draft list of episodes and the associated trigger codes as well as the Episode-Based Cost Measures for the Quality Payment Program Report

Dear Staff for Acumen, LLC:
The Society for Vascular Surgery (SVS), a professional medical society composed of 5,400 specialty-trained vascular surgeons and other medical professionals who are dedicated to the prevention and cure of vascular disease, is very concerned regarding the initial draft list of episodes and the associated triggers for a patient to be attributed to said episodes and their lack of specificity and clinical homogeneity. Our comments below detail these concerns.

- Acumen needs to agree to the SVS offer to convene our leaders and working directly with us starting with a multi-day face to face meeting
- SVS is also nominating several individuals for the Acumen, LLC Clinical Subcommittees for the Cardiovascular Disease Management, and Peripheral Vascular Disease Management separately and we would encourage Acumen to select all the SVS nominees.

Sincerely,
Ronald Fairman, MD
President
Society for Vascular Surgery
Sean Roddy, MD
Chair, Policy and Advocacy Council
Society for Vascular Surgery
Michael Dalsing, MD
Chair, Government Relations Committee
Society for Vascular Surgery
Brad Johnson, MD
Chair, Quality and Performance Measures Committee
Society for Vascular Surgery
Matthew Sideman, MD
Chair, Coding and Reimbursement Committee
Response from Acumen

MACRA Episode-Based Cost Measures CLINICAL SUBCOMMITTEE

- **PVI**- episode groups: Dialysis Access, Inferior Vena Cava Filter Placement, Lower Extremity Peripheral Vascular Disease Treatment, Procedure for Carotid Stenosis
  - Vascular Surgery, Cardiology, General Surgery, Interventional Cardiology, Interventional Radiology, Diagnostic Radiology, Anesthesiology, Geriatric Medicine, Family Medicine, Internal Medicine, Physician Assistant, Nurse Practitioner, Certified Registered Nurse Anesthetist, Peripheral Vascular Disease, Preventive Medicine, Licensed Clinical Social Worker, Clinical Nurse Specialist

SVS- Myself and Karen Woo- June 13th meeting in Wash. DC

**Cardiovascular Disease Management**

- episode groups: Chest Pain, Coronary Artery Bypass Graft (CABG), Coronary Thrombectomy, Heart Failure & Shock, Implantable Cardiac Defibrillator (ICD) Implantation, Left Heart Catheterization, Mitral Valve Procedure, Pacemaker Implantation, Percutaneous Coronary Intervention (PCI), Right Heart Catheterization, Supraventricular Tachycardia (SVT) Ablation, Syncope & Collapse, Thoracic Aortic Aneurysm Repair, Ventricular Tachycardia (VT) Ablation

- Cardiology, Cardiac Electrophysiology, Cardiac Surgery, Interventional Cardiology, Diagnostic Radiology, Thoracic Surgery, Anesthesiology, Vascular Surgery, Critical Care (Intensivist), Intensive Cardiac Rehabilitation, Emergency Medicine, Geriatric Medicine, Internal Medicine, Family Medicine, Physician Assistant, Nurse Practitioner, Certified Registered Nurse Anesthetist, Licensed Clinical Social Worker, Clinical Nurse Specialist

SVS-Matthew Sideman and me- June 15th
At the national level, SVS has partnered with ACS to have Brandeis to develop APMs for EVAR, Carotid, PVD. **Now have our own committee working on APMs**

Tell your payers that you will have APMs based on clinical proven guidelines for the care of Vascular patients. You can take care of all of the needs for:
- PVD (cardiology already has APM proposed)
- Carotid disease
- AAA
- Diabetic foot (have guidelines with Podiatry)
Committee’s Goals

▪ Develop Vascular APMS for SVS members to use:
in contracting with private insurance companies
in working with Medicare under the new Quality Payment Program (QPP).

▪ Provide SVS members with the resources needed to be successful under QPP and to ensure access to high quality care for their patients.

▪ Explore how the use of the Vascular Quality Initiative (VQI) can be incorporated into the model to meet both the quality performance and practice capability requirements.
"Say .... what's a mountain goat doing way up here in a cloud bank?"
Vascular Surgeons are passionate and determined that patients with vascular disease should have QUALITY CARE.
MACRA for Dummy Vascular Surgeon’s Sanity

BRAD JOHNSON, MD
PROFESSOR OF SURGERY
DIVISION OF VASCULAR SURGERY