PCPI Advocacy Update

January 23, 2018

Agenda

- Welcome and Housekeeping (5 minutes)
- Presentation (30 minutes)
  - PCPI Fall Conference Follow-Up (Fei/Price, Davidow)
  - Engagement with Centers for Medicare and Medicaid (Rallins)
  - 2019 PCPI Advocacy Plan (Rallins)
- Question and Answer (20 minutes)
- On the Horizon (5 minutes)

Speakers

Kerri Fei, MSN, RN
Program Manager,
Measure
Development
Operations

Chrystal Price
Associate Director, Registry
Programs

**Stephen Davidow,
MBA-HCM, CPHQ, APR**
Director, Quality
Improvement

Marjorie Rallins, DPM, MSMI
Vice President and Chief Scientific Officer
PCPI

Housekeeping

- This forum is being recorded

- All lines will be muted

- For the Q&A portion of the webinar, please enter your questions and additional feedback into the chat window

PCPI Fall Conference Follow-Up
QCDR Session

Overview

Key Concern	PCPI Actions
QCDR IP Licensing	Collaborate with PCPI members to prepare a **sign-on letter** to CMS explaining concerns and potential unintended consequences of CMS proposed IP licensing approach

Hold **meetings with CMS** to better inform them regarding IP licensing issues and alternative solutions |
Measure Harmonization	PCPI finalization of **Performance Measure Harmonization: A Step-by-Step Guide**
Measure Repository	PCPI to discuss pros and cons of **measures clearinghouse** and other alternatives
Member Engagement	Conduct **ongoing discussion with PCPI members** to identify challenges and responses

QCDR IP Licensing

- **Concern**
  - CMS has proposed that measures be licensed to CMS and made available for use by any QCDR
- **Challenges**
  - QCDRs have invested in measure development
  - Data quality and consistency would need to be maintained across multiple repositories
  - Responsibility for maintenance and update of measures would need to be assigned and funded
- **Actions**
  - Develop and submit a sign-on letter to CMS
  - Convene meetings with CMS to inform them of unintended consequences and propose alternative approaches
- **Resolution**
  - Sign-on letter completed and submitted with 17 signatures
  - Initial meeting held with CMS to discuss issues surrounding measure proliferation

Measure Harmonization

- **Concern**
  - CMS is concerned with proliferation of (similar) measures
  - QCDR stewards are concerned with CMS understanding the value of measures that appear to be duplicative

- **Challenges**
  - Resources and timeline for harmonization of measures
  - Intellectual property issues surrounding harmonization

- **Actions**
  - Expand measure harmonization guide

- **Resolution**
  - Ongoing dialogue with CMS

Measure Repository

- **Concern**
  - QCDRs do not have access to an authoritative source to obtain information on developed and emerging measures

- **Challenges**
  - Duplicate measure development efforts
  - Access to full measure specifications
  - Significant effort needed to create and maintain a repository

- **Actions**
  - Seek alternative means of helping to harmonize measures without a repository

- **Resolution**
  - Ongoing

Member Engagement

- **Concern**
  - All PCPI members should have the opportunity to contribute to PCPI advocacy activities
- **Challenges**
  - The process for PCPI member engagement in advocacy activities is under development
- **Actions**
  - Implement the PCPI process for member engagement in advocacy
  - Convene calls with members to identify and discuss advocacy opportunities
  - Establish designated advocacy PoCs in member organizations
- **Resolution**
  - Creation of Advocacy Advisory Committee and recruitment of committee members
  - Designated staff for carrying out advocacy-related activities

PCPI Fall Conference Follow-Up
Improving Improvement Activities Session

Overview

Key Concern	Actions
Education on IAs and impact on Reimbursement	Systematically educating eligible clinicians on the need for Improvement Activities and curating information on how to best use them.
Challenges and Benefits	Develop list of recommendations for the Advocacy Committee to vet for sharing with CMS including exploration of a process for tying this to Meaningful Measures.
Aligning IAs to Clinical Practice	Develop list of recommendations on how to remove silos between clinical practice and improvement activities for the Advocacy Committee to vet for sharing with CMS.
Enhancing IAs for improvement	Providing Advocacy Advisory Committee with a set of recommendations to better align measures and improvement activities.
Nurturing the Culture for Improvement	Helping clinicians use current resources to align aspects of QPP for improvement.

Education on Improvement Activities and Impact on Reimbursement

- **Concern**
  - Providing education for clinicians on improvement activities is varied and inconsistent including information on website, personal communications, communication through the QCDR and how-to guides
- **Challenges**
  - Ensuring content and education is accessible and useable
- **Actions**
  - Develop list of recommendations for the Advocacy Committee to vet for sharing with CMS
- **Resolution**
  - In process

Challenges and Benefits related to Improvement Activities

- **Concern**
  - Improvement activities have proliferated with no clear ties to a framework and have not addressed some specialty aspects of care
- **Challenges**
  - Engaging in improvement activities has been burdensome and the benefit has not been clear
  - Needs are different across practice types
- **Actions**
  - Develop list of recommendations for the Advocacy Committee to vet for sharing with CMS.
  - Explore a process for tying this to Meaningful Measures.
- **Resolution**
  - In process

Aligning Improvement Activities to Clinical Practice

- **Concern**
  - Improvement activities are siloed and are not seen as complementary to measurement and clinical practice.

- **Challenges**
  - Resources available to help align improvement activities to practice
  - Current timeframes do not allow for the longitudinal work quality improvement

- **Actions**
  - Develop list of recommendations for the Advocacy Committee to vet for sharing with CMS.

- **Resolution**
  - In process

Enhancing Improvement Activities to Drive Improvement

- **Concern**
  - Using the existing Improvement Activities to drive quality improvement
- **Challenges**
  - IAs are not tied to the larger framework of Meaningful Measures which increases burden
  - Lack of alignment with a fundamental QI methodology such as lean
  - No clear value proposition of IAs
  - Lack of transparency on criteria for determining the value of existing improvement activities and selecting new ones
- **Actions**
  - Provide Advocacy Advisory Committee with a set of recommendations to better align measures and improvement activities.
- **Resolution**
  - In process.

Nurturing the Culture for Improvement

- **Concern**
  - Varied success in fostering the culture and environment for improvement and improving care, cost, and lifestyle for clinicians
- **Challenges**
  - Need for a clear roadmap for improving quality and sustaining improvement over time
  - Narrowing the focus for IAs, therefore reducing burden of adoption
- **Actions**
  - Help clinicians understand and use current resources to align aspects of QPP for improvement. Develop list of recommendations for the Advocacy Committee to vet for sharing with CMS to focus on improvement.
- **Resolution**
  - In process.

2019 Advocacy Plan Update

Advocacy Activities

- Engage members

- Educate policy makers

- Respond to rulemaking

- Build coalitions

Advocacy Operational Plan Update

- Overall progress aligns with the timeline
  - Advocacy staffing established
  - Governance
    - Advocacy Advisory Committee (AAC)
    - Dianne Jewell selected as chair
    - Committee to be formed and finalized in February after nominations close
  - Responding to Proposed Rulemaking
    - Outreach to member organizations to identify points of contact began in January
    - Process for member engagement for proposed rulemaking was informally piloted in the development of the CMS sign-on letter
    - info@thepcpi.org
  - Educate Policymakers & Engage Members
    - Current work includes educating CMS on measure development guidelines
    - Participation in CMS whiteboarding session in February

CMS Engagement Update

QCDR Measures Sign-On Letter to CMS

- Sign-On Letter
  - Harmonization challenges
  - Measure licensing concerns
  - 17 members endorsed

CMS Engagement Update

- Face-to-face meeting 01/07/19
  - CMS seeking pre-rulemaking input for QCDR
    - Measure selection criteria
    - Measure harmonization
    - Measure licensing/ownership/business models
  - Kate Goodrich and the CCSQ team participated
    - Positive dialogue with recognition of PCPI as a valuable advisor
  - Next steps
    - Provide input on agenda for "whiteboard" session to identify opportunities to improve processes and address challenges
    - Whiteboard session: CMS PCPI, CMSS, PCRC, QCDR stewards Feb 6
    - Collaborate on the agenda
    - PCPI + CMSS + PCRC = Coalition*

*informal

On the Horizon…

- Nominations for PCPI Advisory Committees – close on January 31
  - Send email to info@thepcpi.org for additional information
- CMS Whiteboarding session February 6, 2019 – stay tuned
  - If you have an interest in participating by phone, send an email to chrystal.price@thepcpi.org
- Reviewing measure development timelines within QCDR Work Group
- Continue discussions on IAs
- Next Webinars:
  - Tales from the Front featuring the American Academy of Physical Medicine and Rehabilitation – February 27, 2019 at 12pm CT
  - The Year Ahead – 2019 Strategic Plans – March 7, 2019 at 12pm CT

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The slides and recording will be posted at
http://thepcpi.org

Stay tuned to your email for updates.

For any questions please contact us at
info@thepcpi.org