National Committee on Vital and Health Statistics

Panel Discussion: Value Based Care Models vs Fee-For-Service: Implications for HIPAA Standards

April 11, 2024

Farzad Mostashari, MD Aledade, Inc

Aledade is the nation's largest network of independent primary care providers

Our mission is to build a better healthcare system for patients, practices and society.

That means meeting every patient where they are, with the coverage they have.

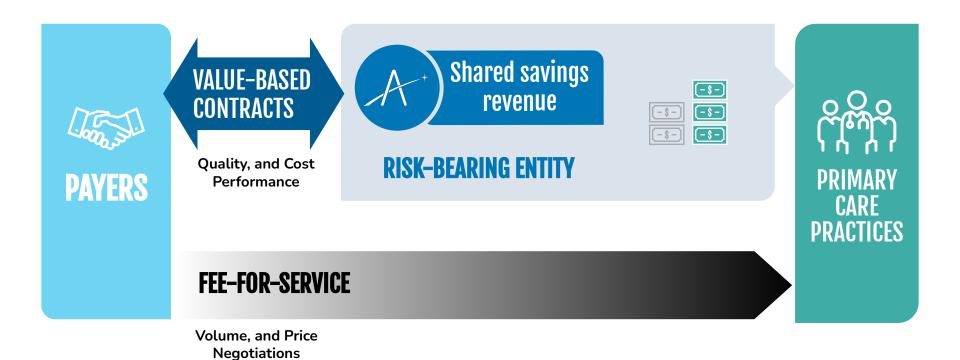


We partner with small and midsize practices, enabling their success and ability to remain independent.

The shift to value-based care supports practice viability, improves patient outcomes, and reduces cost of care.



Value-Based Care aligns incentives



¹ Based on 2016 and 2017 Aleade cohorts

² 2023 results are not finalized and are unaudited. Includes accrued and actual payments for 2023 performance along with payments for prior years that were not previously recorded

Our 200+ Payer Partnerships Span the Country

We partner with national, regional, and single-state payers on value-based agreements for all three lines of business: Medicare Advantage, Commercial, and Medicaid.



Key Examples of Aledade-Payer Partnerships



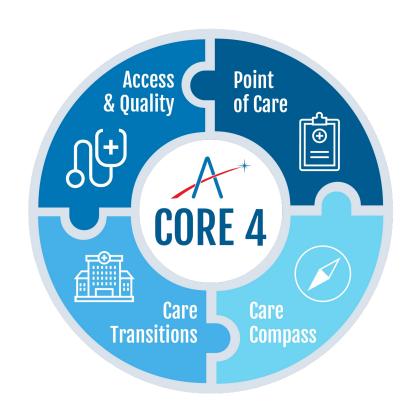






Key Population Health Use-Cases currently use non-standard data formats

- 1. Attribution
- 2. Quality Reporting
- 3. Risk Adjustment
- 4. Revenue/Funding
- Claims and Non-claims expenses





Attribution

- Comprehensive list of attributed members for contracted providers for every contract year
- Incorporates demographic fields used to assess opportunities to improve health equity (e.g., race, ethnicity, preferred language)
- As appropriate, incorporates PCP assignment and risk score/risk categorization

Health Plan Attribution "wish list" (monthly)

Field Value

Attributed Practice TIN Attributed Provider NPI

Unique Member Identifier (Member ID)

Group ID

MBI

Reason Code

Line of Business Product Designation

Member Type

Member First Name

Member Last Name Member Date of Birth

Member Gender

Member Zip Code

Attribution start date

Attribution end date

Pharmacy Indicator

Vision Indicator

Dental Indicator

Risk score

Race

Ethnicity

Language Preference

Foster Indicator

- - -

CMS Assignment list report (monthly)

Variable Name

MBI

HICN

First Name

Last Name

Sex Birth Date

Date of Death

County Name

State Name County Number

Voluntary Alignment Flag

Designated Primary Clinician ACO Participant TIN

Designated Primary Clinician NPI

Claims-Based Assignment Flag

Claims-Based Assignment Step Flag

Previously Assigned Beneficiary Flag Newly Assigned Beneficiary Flag

Medicare Part D Enrollment Flag

Beneficiary excluded for one or more reasons

Beneficiary had a date of death prior to the start of the performance

year

Beneficiary is excluded due to other reasons not listed in the ALR Beneficiary had at least 1 month of Part A-only or Part B-only

Coverage

Beneficiary had at least 1 month in a Medicare Health Plan

Beneficiary does not reside in the United States

Beneficiary included in other Shared Savings Initiatives Monthly Eligibility Flag 1

ioniniy Eligibility

Quality

HEDIS Engine Reports/ Care Gaps

- List of all denominator members in the Care Gaps identified, along with current status
- As available, incorporates prioritization based on health plan predictive analytic capabilities

Medication Adherence Lists

• List of all members considered for medication adherence, along with current status

Quality "Flat File"

 "Flat files" are files that match clinical values scraped from Aledade practice EHRs and from lab feeds (LabCorp and Quest) to patient-specific open care gaps. Their submission ensures compliant clinical values are received by payers for relevant outcomes-based quality measures.

Key Field Value

Unique Member Identifier

Attributed Provider TIN

Member Phone Number

Member DOB

Member Zip Code

Last PCP Visit

Measure Year

Measure Name

Status Indicator

Eligibility Date

Discharge Date

Due Date

Non-Compliance Reason

Test Kit

Last Service Date

File Generation Date

Attributed PCP NPI

Line of Business

Contract or Market Identifier

Risk Adjustment

CMS-Based Risk Adjustment Files (Medicare Advantage Contracts)

- For attributed members, MAO-004 Encounter Data Diagnosis Eligible for Risk Adjustment Report; informs MAOs of the risk adjustment eligibility of diagnosis data submitted on accepted Encounter Data Records (EDRs) and Chart Review Records (CRRs)
- For attributed members, the Monthly Membership Detail data file (MMR), which details beneficiary-level payments and adjustments, as well as information about the risk adjustment factor and payment rate
- For attributed members, Model Output Report (MOR) generated by the Risk Adjustment System (RAS) and reports the Hierarchical Condition Categories (HCCs) used to calculate each beneficiary's risk scores
- Formats same as dictated by CMS Alternate Submission Method (ASM) Diagnosis File Payer accepts supplemental flat file submission of diagnosis codes for risk adjustment and complete code capture purposes.

Field Value

Attributed Provider NPI Unique Member Identifier Date of Birth

Attributed Practice TIN

Claim Number

Begin DOS

Through DOS Submission Date

Claim Type Allowed Flag

Allowed Reason

Dx Code 1 Add/Delete 1

Dx Code 2 Add/Delete 2

Sex ESRD

Age Group Medicaid

HCC₁

HCC₂

Claims and Non-claims expenses

Medical Claims

- All paid professional and institutional medical claims for the attributed members (i.e., all billed services for the member, not just services billed by contracted provider)
- Includes all claims regardless of status (reversed, denied, rejected, adjusted)
- Clearly denotes spending categories under management (e.g., outmember, inmember, DME, pharmacy, specialty pharmacy, post-acute, etc.)
- Denotes full diagnosis code (i.e., not truncated values)
- Clearly denotes member, provider, and paid amounts for each claim line;

All non-claim-based expenses for all attributed members including but not limited to

- capitated arrangements,
- bundled payments,
- supplemental benefits,
- vendors,
- internal programs, etc.

Field Value

TIN
Attributed Provider
NPI

Unique Member

Attributed Practice

Identifier Expense Name

Expense Description

Expense Month Paid Amount

Key Field Value

Unique Member Identifier Claim ID

Line Number

Claim Status

Claim Type

Billing Provider NPI
Billing Provider TIN

Rendering Provider NPI Provider Specialty

Attending Provider NPI
Place of Service

Bill Type Code DRG Code

Paid Date

Insurance Paid Amount
Insurance Allowed Amount

Patient Responsibility Amount
Paid Amount Service Line

Admit Date

Admit Type Code
Discharge Date

Discharge Status Code

Revenue/ Funding

Complete revenue and funding data for attributed members

Field Value

Attributed Practice TIN
Attributed Provider NPI
Unique Member Identifier
Part A Premium

Part B Premium

Part D Premium

Part D Reinsurance

LIS Amount

Individual Member Premium

Group Member Premium

Medicaid/ICP

Part A Contract Term

Part B Contract Term

Part D Contract Term

Total Revenue

Total Funding

Contract Number

PBP

Segment ID

Conclusion

- 1. The importance of further standards alignment within health care especially across the administrative and clinical domains. There's a greater need now for data to be interoperable regardless of use case
- 2. The need to ensure flexibility to work together to test, update, and advance use of FHIR based standards to support administrative/clinically-mixed transactions (e.g., prior auth, claims attachments) where there's potential efficiencies to be gained.
 - It's ok at times to have two standards-based ways to do things, so long as that's clear to the industry and plans are made for a transition.