

2017 AAHKS Advocacy Year in Review

February 10, 2018

EPSTEIN
BECKER
GREEN

EBG 
advisors



National Health Advisors

Broad AAHKS Footprint in Federal Policy and Advocacy Space

2017 Agency Advocacy

FACILITATED AAHKS ACTIVITY

■ 2 Meetings with HHS Secretary

- April - Private meeting with Sec. Price and his Medicare advisor on AAHKS agenda
- June – Roundtable meeting with Sec. Price and CMS Administrator Seem Verma on Medicare regulatory relief



2017 Agency Advocacy

FACILITATED AAHKS ACTIVITY

■ 4 Meetings with CMS Leadership

- January – CMMI meeting on CJR feedback and AAHKS work on an Advanced APM
- February – CMS/Center for Clinical Standard and Quality (CCSQ) on physician specific Outcome measures for TJA
- August – CMMI on AAHKS risk adjustment proposal for Advanced APMs
- December – CMMI new political leadership to introduce the AAHKS agenda



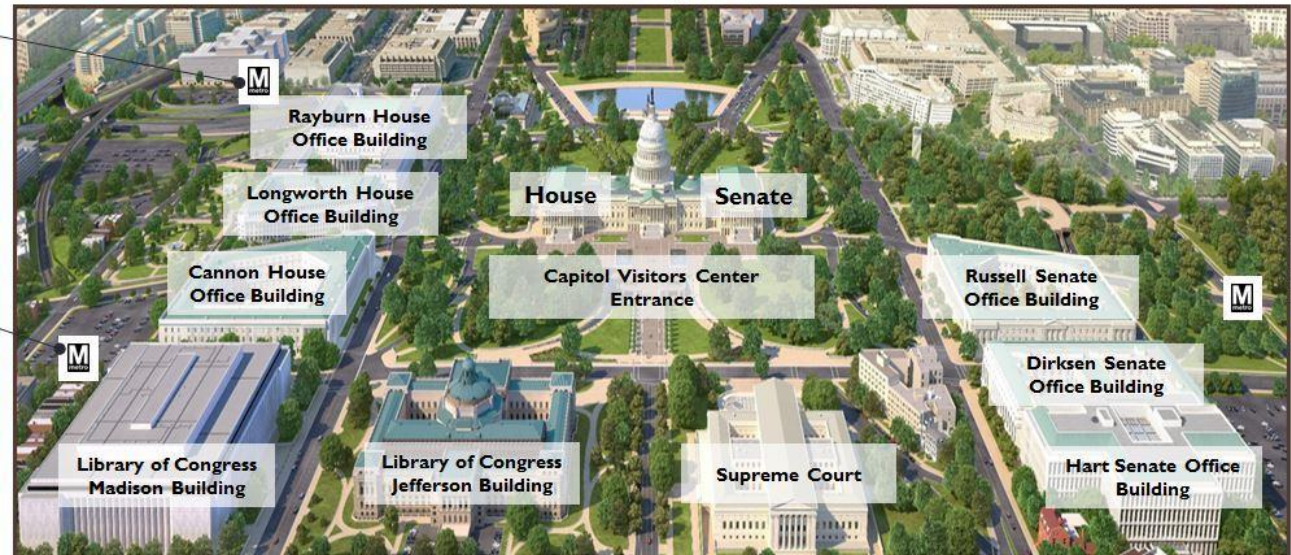
- Also AAHKS-specific questions asked of CMMI and CCSQ leadership at October Health Care Payers Learning and Action Network (HCP-LAN)

2017 Congressional Advocacy

FACILITATED AAHKS ACTIVITY

■ More than 35 Congressional Office Visits

- January
- April
- June
- December



2017 Regulatory Analysis

FACILITATED AAHKS ACTIVITY

- **Analysis and Drafting Summaries and AAHKS Comment Letters to CMS:**
 - May - Inpatient Prospective Payment System (IPPS) Proposed Rule
 - June - Quality Payment Program (MACRA) Year 2 Proposed Rule
 - July - Outpatient Prospective Payment System (OPPS) Proposed Rule
 - July - Physician Fee Schedule Proposed Rule
 - July - CJR Modifications Proposed Rule
 - Nov – CMMI “New Direction” Request for Information
 - Nov - MACRA Episode-Based Cost Measures Field Testing

2017 Regulatory Activity

FACILITATED AAHKS ACTIVITY

- Facilitated AAHKS member survey and synthesis of results to produce AAHKS proposals for
 - HHS/CMS Regulatory Burden Project
 - House Ways & Means Committee Medicare Red Tape Relief Project
- Gained early heads-up of BPCI-A development 17 months before release
- Outreach to CMS/CCSQ to convince them that Meaningful Measures project should encompass filling gaps in measures and not just eliminate unnecessary measures

Next Steps

Prioritizing AAHKS Actions in 2018

February 10, 2018

Lessons Learned

ELEMENTS OF SUCCESSFUL ADVOCACY

- Providers share real world impact of policy on patients and clinical practice
- Provide substantive policy and regulatory analysis to CMS
 - Drafting proposed revisions for CMS
- Oversight and support from Congressional allies
- Political strength in shared objectives with other provider and patient organizations

Be cognizant of which category your activity falls into. Individual elements alone are unlikely to be successful

2018 Priorities

EMERGING LIST – NOT EXHAUSTIVE

- **TKA & 2 Midnight Rule**
 - Substantive analysis & suggestions to CMS/CM/CCSQ/QIOS
 - Substantive analysis and suggestions to CMMI re CJR & BPCI-A impact
 - Follow-up letters of support from Congress
- **Additional BPCI-A Refinements**
 - Recommendations to CMMI
- **Future of MIPS**
 - Should Congress Repeal? If so what should it be replaced with?
 - Should Congress Reform? If so, how?
- **Stark Reform/Relief**
 - Develop principles and proposals
 - Share with Congress and CMS

Timeline for Action

Anticipating Now When Analysis and Advocacy Will be Needed

	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov
CMS Regs		M.A. Rates – Proposed	Reg. Burden Relief ??	IPPS - Proposed	QPP-Year 3 - Proposed	OPPS – Proposed PFS - Proposed		IPPS – Final	QPP-Year 3 - Final	OPPS -Final PFS - Final
CMS Guidance	Specialty Measure & Improvement activity Submission	BPCI-A applications	Stark Reform Task Force ??	Stark Reform Task Force ??	Advancing Care Measure Submission				BPCI-A Performance Year begins	
Legislation & Hearings	MIPS & APMs		Opioid Abuse Prevention and Treatment	Opioid Abuse Prevention and Treatment				Stark Reform & Red Tape Relief ??	Stark Reform & Red Tape Relief ??	