

Are You Prepared for the 2024 Medicare Advantage Final Rule Changes?

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Finalized Provisions from the Final Rule 2024 and Final Rule Cliffhangers

Transactional & Medication Therapy Retroactive Coverage Star Ratings **Health Equity** Through LI NET Management (MTM) Program Addressed in Final **Expanding Eligibility** Utilization Rule for LIS Under Part D Management **PROPOSED** Some Provisions **RULE 2024** Addressed in Final Rule Changes to Approved Part D Formulary – Marketina Not Addressed in Substitutions Final Rule Translation and Accessible Format for Enrollee Notification Overpayment Marketing and Behavioral Health Requirements Provisions of the ACA Communication Materials



A Second Final Rule?!

- "CMS intends to address all of the remaining proposals from the December 2022 proposed rule in subsequent rulemaking. Therefore, CMS plans to make provisions adopted in the subsequent, second final rule applicable to coverage beginning no earlier than January 1, 2025."
- CMS also noted they are not addressing comments received on these provisions in this first Final Rule and will "...address them at a later time, in a subsequent rulemaking document, as appropriate."



Summary of Stars Ratings-Related Changes

	2022	2023	2024	2025	2026
*	2024	2025	2026	2027	2028

Removal of Part FUC 60% Rule C Diabetes Care – Kidney Disease Monitorina

Tukey Outlier Deletion

discontinued after this vear

CAHPS

- Add web-based survey mode and telehealth (2024 Survey)
- Remove 15-minute wait time auestion

Significant Weight Changes:

• Patient Experience/Complaints and Access Measures from 4x to 2x

Revised Measures

 Implement Continuous Enrollment to the 3 Medication Adherence Measures

New Measure

 Add Part C Kidney Health Evaluation for Patients with Diabetes (KED) Measure

Health Equity Index (HEI) Reward to replace the Reward Factor

Medication Adherence Updates:

- All three measures to be risk adjusted and excluded from CAI
- Remove Inpatient/Skilled Nursing Facility (IP/SNF) stay adjustment from all three measures

Changes Still Outstanding

- Measurement Changes: Improvement Measure Hold Harmless to only apply to 5-Star contracts
- Returning Measures: Care for Older Adults Functional Status Assessment (Part C)
- Retired Measures: Medication Reconciliation Post-Discharge (MRP) Stand alone
- Cut-Point Methodology Changes: Guardrails to be removed

New Measures

- Concurrent Use of Opioids and Benzodiazepines (COB) (Part D)
- Polypharmacy Use of Multiple Anticholinergic Medications in Older Adults (Poly-ACH) (Part D)
- Polypharmacy Use of Multiple Central Nervous System Active Medications in Older Adults (Poly-CNS) (Part D)
- Colorectal Cancer Screening (Part C)





Final Rule 2024 Star Ratings Provisions



Health Equity Index Reward Factor

Measure to reward reduction of disparities in those with Social Risk Factors (SRFs), namely Low-Income Subsidies (LIS)/Dual-Eligible (DE)/Disability

Based on two years of data, starting with calendar year 2024-2025 (Star year 2026-2027) to be applied in Star year 2027

Will replace existing Reward Factor to promote reduction of disparities as opposed to high performance/low variability

Added to unrounded Summary and Overall scores

Measures included will be **announced annually** in the Payment and Risk Adjustment policies in section 1853(b) of the Act – At this time, we don't know what measures will be used



RF vs. HEI

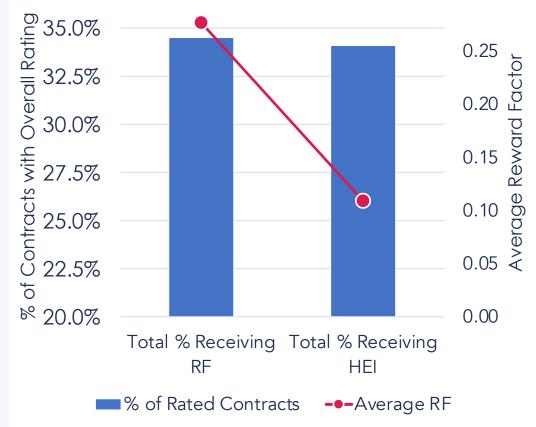
RF vs. HEI

Roughly the same percentage of plans will receive a Health Equity Index Reward

HOWEVER

the average magnitude of that reward is only about 40% of the average current Reward Factor

(0.28 vs. 0.11)





*Analysis and modeling conducted by Hyperlift

What Are the Member Experience Measures?

Getting Needed Care (CAHPS)

Getting
Appointments and
Care Quickly
(CAHPS)

Customer Service (CAHPS)

Rating of Health Care Quality (CAHPS)

Rating of Health Plan (CAHPS)

Care Coordination (CAHPS) Complaints about the Health/Drug
Plan

Members Choosing to Leave the Plan Plan Makes Timely Decision about Appeals

Reviewing
Appeals Decisions

Call Center-Foreign Language Interpreter and ITY Availability Call Center-Foreign Language Interpreter and ITY Availability

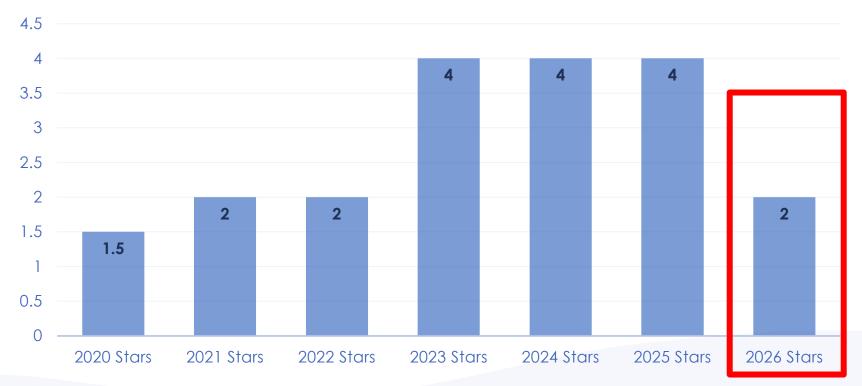
Rating of Drug Plan (CAHPS)

Getting Needed Prescription Drugs (CAHPSD)



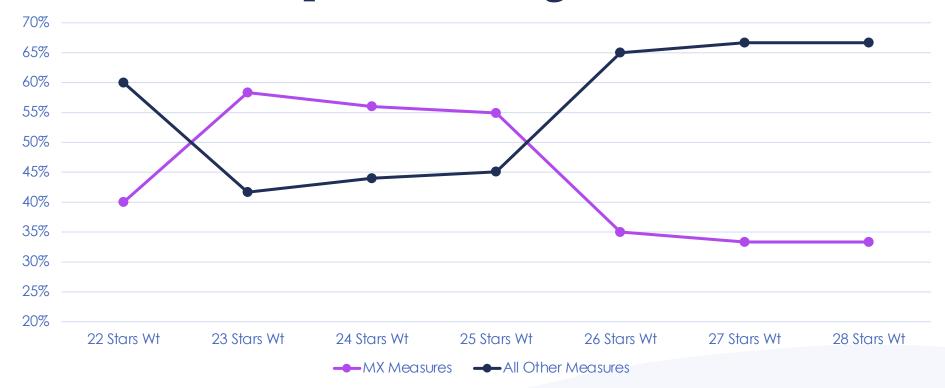


Member Experience Weight Whiplash





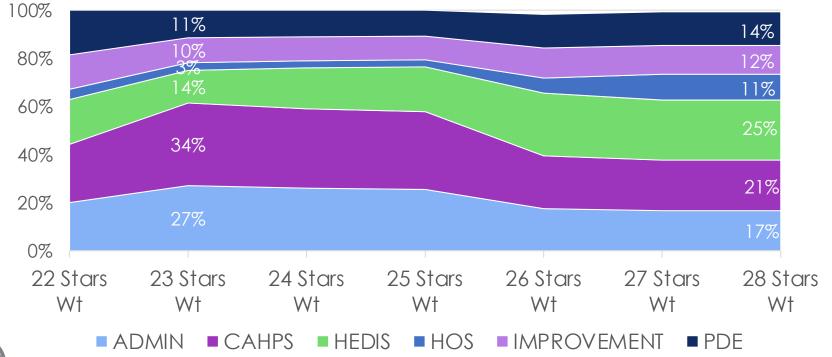
Member Experience Weight Rollercoaster





The Resurrection of HEDIS

The reduction in member experience measure weights, along with the addition of both new and returning HEDIS measures, will return HEDIS to the most heavily-weighted domain.





Medication Adherence Measure Changes

Risk-Adjusted/Case Mix Adjusted

- To reflect differences in member populations, all three medication adherence measures will be risk adjusted based on the following sociodemographic status (SDS) characteristics:
 - Age
 - Gender
 - Dual Eligibility/Low-Income Subsidy
 - Disability
- Measure reporting should be stratified by these 4 SDS characteristics to help plans identify disparities and understand how member mix impacts measure rates.
- Current measures will remain in Star Ratings while these modifications will become display measures for MY2024-2025 then move to weight of 1 for MY2026/ SY2028
- The "new" measures will be removed from the CAI calculation

Transition to Continuous Enrollment

- •To fully align with Pharmacy Quality Alliance (PQA), CMS will use continuous enrollment and no longer adjust for member-years for the medication adherence measures starting in MY2024/SY2026
 - Members with more than 1-day gap in enrollment during the treatment period will be excluded

IP/SNF Stay Adjustment Removed

 To fully align with Pharmacy Quality Alliance (PQA), CMS will no longer adjust for inpatient (IP) or skilled nursing facility (SNF) stays for MY2026/SY2028





Have More Questions?



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