ASCO Practice Leadership Series

Medicare’s Enhancing Oncology Model: What To Know

Thursday, July 21, 2022
Welcome!

• Please mute your phones
• Q&A session at the end
  ▪ Use the Q&A button in the bar at the bottom of your Zoom window
  ▪ Type in your question
  ▪ We will address questions in the order they are received
Speakers

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ENHANCING ONCOLOGY MODEL

- EOM OVERVIEW PRESENTATION
This webinar will provide an introduction of the Enhancing Oncology Model (EOM). The following topics will be discussed:

1. Enhancing Oncology Model (EOM) Background
2. Model Design
3. Timeline and Next Steps
4. Q&A
EOM Background
ENHANCING ONCOLOGY MODEL (EOM) 
BACKGROUND

Cancer is one of the most common and devastating diseases in the United States (US):

**Over 1.9 million** people are estimated to be diagnosed with cancer in the US in 2022.¹

**609,360 deaths** estimated in 2022. Cancer was the second leading cause of death in the US but was the leading cause of death for males and females aged 60-79 years old, the majority of whom are Medicare patients.²

Examples of disparities in cancer care include, but are not limited to, delays in initiation of chemotherapy, more advanced stage of diagnosis, underrepresentation and access to clinical trials, decreased medication adherence, more frequent hospitalizations and ICU admissions near the end of life, and lower enrollment in hospice.³, ⁴

**EOM Purpose:**

To drive transformation in oncology care by preserving or enhancing the quality of care furnished to beneficiaries undergoing treatment for certain cancer types, and with the expectation that such transformations will reduce Medicare expenditures.

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## EOM Transformation of Fee-for-Service

### Traditional Fee-for-Service (FFS)

Oncology providers and suppliers generally receive separate payments for each item or service furnished to a beneficiary during the course of their cancer treatment. Focus on treating the disease and not the person, resulting in fragmented care.

### EOM Alternative Payment Model (APM)

Participants will be incentivized to consider the whole patient and engage with them proactively, during and between appointments.

Physician group practices (PGPs):
1. Take on financial and performance accountability for episodes of care surrounding chemotherapy administration
2. Have the opportunity to submit payment for provision of Enhanced Services furnished to beneficiaries
3. Are encouraged to promote health equity, to improve beneficiaries’ health outcomes and reduce costs
EOM Design
OCM Lessons Learned: Practice Perspectives

**Standardizing Efficient Care Delivery**
- ✔ Standardizing information technology
- ✔ Standardizing care across sites/clinics
- ✔ Benefits of standardization for non-Medicare patients (spillover from OCM)

**Moving Toward Value-based Care**
- ✔ Weighing costs of cancer treatments
- ✔ Favoring lower-cost supportive care therapies
- ✔ Reducing drug wastage
- ✔ Value of reduced ED visits or hospitalizations

**Person-centered Care Improvements**
- ✔ Better and faster patient access
- ✔ Reorganized teams, workflows and communication
- ✔ Patient navigation
- ✔ More complete information to support shared decision making

**Using Data for Quality Improvement**
- ✔ Using Feedback Report metrics and benchmarks for continuous quality improvement (CQI)
- ✔ Using Medicare claims for CQI
- ✔ Using other data for CQI

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OVERVIEW OF ENHANCING ONCOLOGY MODEL (EOM)

**FOCUS**

Five-year, voluntary payment and delivery model scheduled to begin July 2023 and conclude June 2028, that focuses on innovative payment strategies that promote high-quality, person-centered, equitable care to Medicare FFS beneficiaries with certain cancer diagnoses who are undergoing chemotherapy treatment.

**PARTICIPANTS**

Oncology Physician Group Practices (PGPs) and other payers (e.g., commercial payers, state Medicaid agencies) through multi-payer alignment.

**QUALITY & PAYMENT**

EOM participant are paid FFS with the addition of two financial incentives to improve quality and reduce cost:

- Additional payment to support care transformation in the form of a $70 per-beneficiary-per-month Monthly Enhanced Oncology Services (MEOS) to support care transformation. Participants can bill an additional $30 per-beneficiary-per-month MEOS for EOM beneficiaries that are dually eligible, this additional payment will be excluded from EOM participants’ total cost of care (TCOC) responsibility. EOM participants would be eligible to receive MEOS for furnishing Enhanced Services.

- Potential performance-based payment (PBP) or performance-based recoupment (PBR) based on the total cost of care (including drugs) and quality measures during 6-month episodes that begin with the receipt of chemotherapy.

EOM will continue to drive care transformation and reduce Medicare costs.
Eligibility: Defining EOM Participants and Practitioners

**EOM Participant**

Must be a Medicare-enrolled oncology PGP identifiable by a unique federal taxpayer identification number (TIN).

- **EOM Practitioner List**: Must identify **one or more EOM practitioner(s)**, including at least one EOM practitioner must be an oncology practitioner with a specialty code of Hematology/Oncology or Medical Oncology.

- **Excluded**: Oncology PGPs that routinely refer beneficiaries to Prospective Payment System (PPS)-Exempt Cancer Hospitals (PCH) for chemotherapy services are not eligible to participate

- For EOM, unlike OCM, we plan to have participation requirements that allow a limited degree of flexibility for EOM practitioners simultaneously billing under the TIN of the EOM participant and the TIN of another PGP, while still preserving program integrity.

**EOM Practitioner**

Must be a Medicare-enrolled physician or non-physician practitioner (e.g., Nurse Practitioner) identified by an individual National Provider Identifier (NPI) who:

1. Furnishes E&M services to Medicare beneficiaries receiving chemotherapy for a cancer diagnosis
2. Bills under the TIN of the PGP for such services
3. Reassigned his or her right to receive Medicare payments to the PGP
4. Appears on the participant’s EOM Practitioner List (to be updated semiannually)
Subject to certain exceptions, **seven cancer types** will be included in EOM. These include breast cancer, chronic leukemia, small intestine/colorectal cancer, lung cancer, lymphoma, multiple myeloma, and prostate cancer.

Each episode will begin with a **beneficiary's receipt of an initiating cancer therapy** and **must include a qualifying Evaluation & Management (E&M) service** during the 6-month period that follows. CMS will maintain a list of initiating cancer therapies.

Attribute to the eligible oncology PGP that provides the first qualifying E&M service after the initiating chemotherapy, provided that the PGP has at least 25% of the cancer-related E&M services during the episode; if the initiating oncology PGP does not bill at least 25% of cancer-related E&M services during the episode, then attribute based on plurality of cancer-related E&M services at an oncology PGP.
Payer Alignment

EOM is a multi-payer model.

**Goal:** Payers align their oncology value-based payment models with EOM in key areas (e.g., commitment to health equity, alignment on payment approach, and data sharing with EOM participants and CMS) to promote a consistent approach across payers and patient populations.

The following payers are eligible to apply:

- Medicare Advantage Plans
- State Medicaid Agencies
- Private Payers
- EOM Participants

Payers must partner with at least one EOM participant **throughout the entirety of the model** to continue participating in EOM.

To the extent permitted by law, CMS will provide **payers with data and resources** including opportunities to collaborate and engage with other payers and learning activities.
Quality Strategy

- CARE TRANSFORMATION THROUGH PARTICIPANT REDESIGN ACTIVITIES (PRAs)
- QUALITY MEASURES & DATA REPORTING
- ADVANCING HEALTH EQUITY
Care Transformation through Participant Redesign Activities (PRAs)

- Provide beneficiaries **24/7 access** to an appropriate clinician with real-time access to the EOM participant’s medical records
- Provide **patient navigation**, as appropriate, to EOM beneficiaries
- Document a **care plan** for each EOM beneficiary that contains the 13 components of the Institute of Medicine (IOM) Care Management Plan
- Treat beneficiaries with therapies in a manner consistent with nationally recognized **clinical guidelines**
- Identify EOM beneficiary **health-related social needs** using a health-related social needs screening tool
- Gradual implementation of **electronic Patient Reported Outcomes (ePROs)**
- **Utilize data** for continuous quality improvement (CQI), including the development of a health equity plan
- Use **certified Electronic Health Records (EHR) Technology** (CEHRT)
EOM will include valid, reliable, and meaningful claims-based, participant-reported and survey measures. Performance on these measures will be tied to payment:

**Quality Measures** will focus on the following domains:
- Patient experience
- Avoidable acute care utilization
- Management of symptoms toxicity
- Management of psychosocial health
- Management of end-of-life care

**Clinical Data Elements** – collection and reporting of clinical data elements not available in claims or captured in the quality measures (e.g., ever-metastatic status, HER2 status) for purposes of monitoring, evaluation, and payment

**Sociodemographic Data Elements** – collection and reporting of beneficiary-level sociodemographic data to be used for monitoring and evaluation. Feedback reports will stratify aggregate de-identified data by sociodemographic variables in order for EOM participants to identify and address disparities within their beneficiary populations
# Health Equity

EOM seeks to improve quality of care and equitable health outcomes for all EOM beneficiaries, including but not limited to:

<table>
<thead>
<tr>
<th>EOM Requirement</th>
<th>Description</th>
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<tbody>
<tr>
<td>1</td>
<td>Incentivize care for underserved communities</td>
</tr>
<tr>
<td>2</td>
<td>Collect beneficiary-level sociodemographic data</td>
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</tbody>
</table>
| 3 | Identify and address health-related social needs (HRSN) | EOM participants will be required to use **screening tools** to screen for, at a minimum, three **HRSN domains**: transportation, food insecurity, and housing instability. Example HRSN screening tools:  
  - NCCN Distress Thermometer and Problem List  
  - Accountable Health Communities (AHC) Screening Tool  
  - Protocol for Responding to and Assessing Patient’s Assets, Risks, and Experiences (PRAPARE) Tool  
  **Collect ePROs** from patients, including a HRSN domain* |
| 4 | Improved shared decision-making and care planning | EOM participants will be required to **develop a care plan** with the patient, including discussion of prognosis and treatment goals, a plan for addressing psychosocial health needs, and estimated out-of-pocket costs |
| 5 | Continuous Quality Improvement (CQI) | EOM participants will be required to develop a **health equity plan** as part of using data for CQI |
Data Sharing and Health IT

**EOM PARTICIPANT DATA SHARING**

<table>
<thead>
<tr>
<th>DATA COLLECTION STRATEGY</th>
<th>TYPES OF DATA</th>
<th>TIMING</th>
</tr>
</thead>
</table>
| Electronically enabled mechanism to report model-related data abstracted from the EOM participant’s own health IT | 1. Quality measure data  
2. Clinical and staging data  
3. Beneficiary-level sociodemographic data | EOM participants will be required to report data at a time and manner specified by CMS, but no more than once per performance period |

**CMS DATA SHARING WITH PGPs**

- **QUARTERLY FEEDBACK REPORTS**
- **SEMIANNUAL RECONCILIATION REPORTS, ATTRIBUTION LISTS, AND EPISODE-LEVEL FILES**
- **MONTHLY CLAIMS DATA**
Two-Part Payment Approach

Episodes will last for 6 months after a beneficiary’s triggering chemotherapy claim. CMS will also consider removing episodes with a COVID-19 diagnosis that initiated during the EOM model performance period from the model’s reconciliation calculations if the care for such beneficiaries remains extremely costly as more recent data become available.

**EPISODE DURATION AND SCOPE**

The base MEOS payment amount will be $70 per EOM beneficiary per month.

**Beneficiaries dually eligible for Medicare and Medicaid:** CMS will pay an additional $30 per dually eligible beneficiary per month, for a total MEOS payment of $100 per beneficiary per month. The additional $30 will not count toward the EOM participant’s total cost of care responsibility.

**Monthly Enhanced Oncology Services (MEOS) Payment**

**Performance-Based Payment (PBP) or Recoupment (PBR)**

EOM participants will be responsible for the total cost of care (TCOC) (including drugs) during each attributed episode. Based on total expenditures and quality performance, participants may:

- Earn a PBP
- Owe a PBR
- Fall into the neutral zone (neither earn a PBP nor owe a PBR)
PBP, PBR, and Neutral Zone

**PERFORMANCE BASED PAYMENT**

- **Total Expenditures < Target Amount**
  EOM participants or pools may earn a PBP if total expenditures for attributed episodes are below a risk-adjusted target amount.

**PERFORMANCE BASED RECOUPEMENT**

- **Total Expenditures > Threshold for Recoupment**
  EOM participants or pools will owe a PBR if total expenditures for attributed episodes exceed the threshold for recoupment.

**NEUTRAL ZONE**

- **Target Amount < Total Expenditures ≤ Threshold for Recoupment**
  EOM participants or pools will fall into the neutral zone (neither earning a PBP nor owing a PBR) if total expenditures for attributed episodes are above the target amount and below or equal to the threshold for recoupment.

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Total performance period expenditures as percentage of benchmark amount.
## Risk Arrangement Options

*Amounts of PBP earned or PBR owed* by the EOM participant or pool will be calculated as a percentage of the *benchmark* amount. The benchmark amount represents the total projected cost of attributed episodes in the absence of EOM.

<table>
<thead>
<tr>
<th>Risk Arrangement 1 (RA1)</th>
<th>Risk Arrangement 2 (RA2)</th>
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<tbody>
<tr>
<td><strong>EOM Discount</strong></td>
<td><strong>Threshold for Recoupment</strong></td>
</tr>
<tr>
<td>4% of the benchmark amount</td>
<td>98% of the benchmark amount</td>
</tr>
<tr>
<td><strong>Target Amount</strong></td>
<td><strong>Target Amount</strong></td>
</tr>
<tr>
<td>96% of the benchmark amount</td>
<td>97% of the benchmark amount</td>
</tr>
<tr>
<td><strong>Stop-loss / Stop-gain</strong></td>
<td><strong>Stop-loss / Stop-gain</strong></td>
</tr>
<tr>
<td>2% Stop-Loss</td>
<td>6% Stop-Loss</td>
</tr>
<tr>
<td>4% Stop-Gain</td>
<td>12% Stop-Gain</td>
</tr>
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Quality Payment Program

Advanced Alternative Payment Model (Advanced APM)

Beginning in Performance Period 1 (July 1, 2023), we expect Risk Arrangement 2 of EOM will meet the criteria under 42 CFR § 414.1415 to be an Advanced Alternative Payment Model (Advanced APM). See the Advanced APM section in EOM’s RFA for additional information.

Merit-based Incentive Payment System (MIPS)

We expect both Risk Arrangement 1 and Risk Arrangement 2 of EOM will meet the criteria to be a Merit-based Incentive Payment System (MIPS) APM. See the MIPS section in EOM’s RFA for additional information.
EOM Learning Community

**EOM Learning System will support the achievement of the EOM’s Strategic goals through:**

1. Leveraging CMS and EOM participant and payer data to identify new knowledge and best practices
2. Sharing and spreading new knowledge and best practices through learning communities and networks
3. Information and work will be shared through three communication channels:
   - 1. From participant to participant
   - 2. From CMS to participants
   - 3. From participants to CMS

The EOM Learning System will be **based on novel aspects of EOM** and will also **build upon pertinent learnings from OCM**. It will include resources such as:

- **Online Collaboration Platform**
- **Case Studies & Innovation Spotlights**
- **Affinity and Action Groups**
- **Webinars**

*The same communication channels will be used for payer communications.*
Timeline and next steps
# Model Timeline

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Planned Timing¹</th>
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<tbody>
<tr>
<td>RFA released / Application portal opens</td>
<td>June 27, 2022</td>
</tr>
<tr>
<td>Application deadline</td>
<td>September 30, 2022</td>
</tr>
<tr>
<td>Participant selection &amp; Participant Agreement (PA) signing</td>
<td>Late Winter 2022 or Early Spring 2023</td>
</tr>
<tr>
<td>Pre-implementation period</td>
<td>January 1, 2023 – June 30, 2023</td>
</tr>
<tr>
<td>Performance periods</td>
<td>Start July 1, 2023</td>
</tr>
</tbody>
</table>

¹ Dates are subject to change
How to Apply

Application period for EOM is currently open
All EOM applications must be submitted by 11:59 pm Eastern Daylight Time on September 30, 2022. CMS may not review applications submitted after the deadline.

Submit application to https://app.innovation.cms.gov/EOM.
Submission of the PDF version of this application will not be accepted.

Refer to https://innovation.cms.gov/innovation-models/enhancing-oncology-model for directions on how to access the EOM RFA Application Portal
Once logged into the portal, there are further instructions on how to navigate the application included on the right-hand side of the home page by selecting the “User Manual” link.

Refer to the RFA on EOM website for further details
Further details regarding participation requirements and application submission criteria are available in the RFA on the https://innovation.cms.gov/innovation-models/enhancing-oncology-model. Applications will be reviewed for completion of all required fields and a signed and dated application certification.

Sign up for the EOM listserv
EOM will host additional recruitment events and release more resources during Summer/Fall 2022 to help potential participants understand the model before the application deadline. Sign up for the EOM listserv to learn about these materials as they are announced.
## UPCOMING EVENTS

<table>
<thead>
<tr>
<th>EOM Event</th>
<th>Planned Date¹</th>
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<tbody>
<tr>
<td>EOM Payment Methodology Webinar</td>
<td>July 26, 2022</td>
</tr>
<tr>
<td>EOM Application Support Office Hour</td>
<td>August 16, 2022</td>
</tr>
<tr>
<td>Quality Strategy Webinar</td>
<td>August 2022</td>
</tr>
</tbody>
</table>

¹ Dates are subject to change
RESOURCES AND CONTACT INFO

For more information about the EOM and to stay up to date on upcoming model events:

Visit
innovation.cms.gov/innovation-models/enhancing-oncology-model

Help Desk
EOM@cms.hhs.gov
1-888-734-6433 Option 3

Follow
@CMSinnovates

Listserv
Sign up for the EOM listserv at this listserv registration link
Questions?

Use the Q&A button in the bar at the bottom of your Zoom window
Learn More About PracticeNET

• Free oncology business benchmarking program
  ▪ Productivity, revenue, staffing, resources

• Covers multiple service lines
  ▪ Providers and APPS
  ▪ Medical oncology/hematology
  ▪ Radiation oncology
  ▪ Gynecologic oncology

• Must have at least 1 ASCO member at your practice

• Contact us at practicenet@asco.org
Next Call

• Thursday, July 28
  ▪ The 2023 Medicare Physician Fee Schedule Proposed Rule

• 3rd Thursday of each month, 4:00pm Eastern Time

https://practice.asco.org/calendar
Appendix
## OCM to EOM High Level Comparison

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<thead>
<tr>
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<th>OCM</th>
<th>EOM</th>
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<tbody>
<tr>
<td>Health equity</td>
<td>No explicit focus</td>
<td>Key element of design and implementation</td>
</tr>
<tr>
<td>Beneficiary population</td>
<td>Beneficiaries with all cancer types who receive chemotherapy or hormonal therapy</td>
<td>High-risk beneficiaries with certain cancer types receiving systemic chemotherapy only</td>
</tr>
<tr>
<td>Use of ePROs</td>
<td>No requirement</td>
<td>Required gradual implementation</td>
</tr>
</tbody>
</table>
| MEOS payment                   | $160 PBPM for each OCM beneficiary                                 | $70 PBPM for beneficiaries not dually eligible for Medicaid and Medicare  
|                                |                                                                     | $100 PBPM for beneficiaries dually eligible for Medicaid and Medicare  |
| Attribution                    | Based on plurality of E&M claims                                   | Based on initial care plus at least minimum care over time           |
| Benchmark and novel therapy calculations | At the practice level; limited use of clinical data to inform risk adjustment | At the cancer type level; more robust use of clinical data to inform risk adjustment |
| Risk arrangements for performance-based payment | One-sided risk in performance period 1, followed by the option for one- or two-sided risk in performance periods 2-7  
Participants earning a performance-based payment by the initial reconciliation of PP4 have the option to stay in one-sided risk in PP8—PP11; other participants must either accept two-sided risk in PP8—PP11 or be terminated from the model | Two downside risk arrangement options |

*Please note this list is not exhaustive. For additional information on how EOM differs from OCM, refer to Appendix A of the EOM RFA*
Patient Navigation

EOM participants will be required to provide the core functions of patient navigation, as appropriate, to all EOM beneficiaries who request and/or need these services.

Core functions of patient navigation

1. Coordinating appointments with health care providers to ensure timely delivery of diagnostic and treatment services;
2. Maintaining communication with EOM beneficiaries, families, and the health care providers to monitor EOM beneficiary satisfaction with the cancer care experience and provide health education;
3. Ensuring that appropriate medical records are available at scheduled appointments;
4. Providing language translation or interpretation services in accordance with federal law and policy;
5. Facilitating linkages to follow-up services and community resources (e.g., make referrals to cancer survivor support groups and community organizations or other third parties that provide child/elder care, transportation, or financial support); and
6. Providing access to clinical trials as medically appropriate.
Institute of Medicine (IOM) Care Plan Elements

Each EOM participant will be required to document a comprehensive cancer care plan for the EOM beneficiary, and the EOM participant will be required to engage the EOM beneficiary in the development of the care plan.

1. **Patient information** (e.g., name, date of birth, medication list, and allergies)
2. **Diagnosis**, including specific tissue information, relevant biomarkers, and stage
3. **Prognosis**
4. **Treatment goals** (curative, life-prolonging, symptom control, palliative care)
5. **Initial plan for treatment and proposed duration**, including specific chemotherapy drug names, doses, and schedule as well as surgery and radiation therapy (if applicable)
6. **Expected response to treatment**
7. **Treatment benefits and harms**, including common and rare toxicities and how to manage these toxicities, as well as short-term and late effects of treatment
8. **Information on quality of life** and a patient’s likely experience with treatment
9. **Who would take responsibility** for specific aspects of a patient’s care (e.g., the cancer care team, the primary care/geriatrics care team, or other care teams)
10. **Advance care plans**, including advanced directives and other legal documents
11. **Estimated total and out-of-pocket costs** of cancer treatment
12. **A plan for addressing a patient’s psychosocial health needs**, including psychological, vocational, disability, legal, or financial concerns and their management
13. **Survivorship plan**, including a summary of treatment and information on recommended follow-up activities and surveillance, as well as risk reduction and health promotion activities