Bundled Payments for Care Improvement (BPCI) Advanced Annual Check-in Questionnaire

Thank you for taking time to complete this important questionnaire.

Purpose:

This questionnaire will be sent annually as part of the Center for Medicare & Medicaid Service's (CMS) efforts to monitor Model implementation and Participant compliance for BPCI Advanced in accordance with Article 13 of the Participation Agreement. CMS will use the responses to monitor Participants' activities and barriers related to designing and implementing the BPCI Advanced Model and the associated impact of these activities. Results from this effort will inform learning and other CMS activities designed to help Participants provide high quality beneficiary care and increase likelihood of achieving success in the Model. The Monitoring and Compliance team will review the completed questionnaires and documentation in concert with CMS. Follow up with Participants may be required if further clarification is needed related to submitted information.

Instructions:

Participants are required to complete a questionnaire for each BPCI Advanced Participation Agreement they have with CMS. The questionnaire should be completed by a Participant representative with knowledge of various aspects of the Participant's experience in the BPCI Advanced Model. If needed, you are encouraged to reach out to other subject matter experts in your organization. Please respond based on how each question applies to the Participant. If any question does not apply, please select N/A. For clarification of key terminology (e.g., BPCI Advanced Entity, NPRA Sharing Partner and Payment Policy Waiver), please refer to Article 2 Definitions of the Participation Agreement.

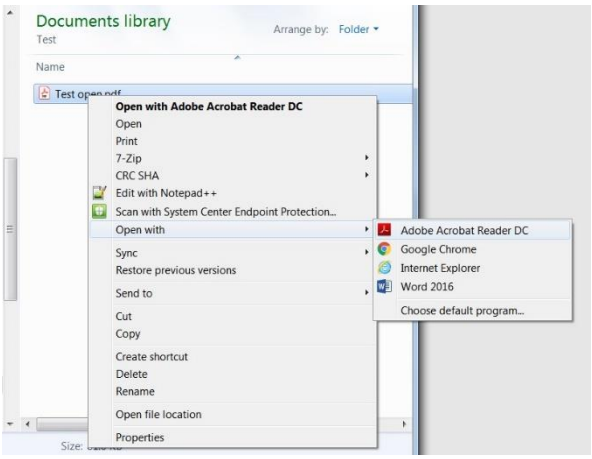
If applicable, use the Excel spreadsheet (Waiver Data Collection Template), found on the Participant Portal to document responses to the following:

- Waivers (Fraud & Abuse and Medicare Payment Policy), Questions #3 and #7

Special PDF software is not needed to complete this questionnaire. You can use the free Adobe Acrobat Reader DC to complete the questionnaire. If your computer does not have a PDF reader installed, please download a PDF Reader to access the full functionality of the fillable PDF.

Some computers are configured to default automatically, upon double-clicking to open PDF files in applications other than Adobe Reader, such as an Internet browser. To ensure that the application opens in Adobe Reader:

- Save the attachment to a folder on your computer
- Highlight the file name, right click, select "Open with"
- Click on Adobe Acrobat Reader from the drop-down box.



For Convener Participants with more than one Participation Agreement with CMS, if answers to the questionnaire will be similar across all Parent BPIDs, you can simply save the completed questionnaire with a different file name and make adjustments as needed.

The questionnaire is due **no later than September 23, 2019 at 11:59PM ET** in the Participant Portal. Please complete this questionnaire electronically as it contains drop down options that are not visible in a printed hard copy. Please upload the completed questionnaire and relevant documentation requested within the questionnaire to the Participant Portal.

Contact:

CMS contracted with IMPAQ International, LLC to perform BPCI Advanced compliance and monitoring activities. If you have any questions regarding this questionnaire, please contact IMPAQ at BPCI_Advanced_MC@impaqint.com.

General Information

BPID 1191

Organization Legal Name Integrated Care Solutions, LLC

General Information Requested

1. Does the Participant have current or past experience with CMS Innovation Center models and/or Medicare demonstrations beyond BPCI Advanced?

Yes

2. Does the Participant have experience with value-based care beyond CMS Innovation Center models and/or Medicare demonstrations?

Yes

Organization Legal or Identification Changes

1. Has the Participant, or any of its Downstream Episode Initiators, NPRA Sharing Partners, or BPCI Advanced Entities, had a legal name change, change of control or change of tax identifier in the last year?

No

2. If selected 'Yes' to question 1, have you reported these changes to CMS? *[If your response to this question is 'no', please provide written notice of changes to CMS via email (BPCIAdvanced@cms.hhs.gov). Instruction and additional information are located under Article 3 of the Participation Agreement].*

N/A; we didn't have any changes

Participant Profile

1. Does the Participant anticipate making any additional changes to the list of Episode Initiators within the Participant Profile effective for Model Year 3?

No

2. Is the Participant likely to add Clinical Episodes within the Participant Profile effective for Model Year 3?

Unsure

3. Is the Participant likely to remove Clinical Episodes from the Participant Profile effective for Model Year 3?

Unsure

Care Redesign Plan

1. The Participant is on track to implement selected Care Redesign interventions within the timeframes indicated within the Care Redesign Plan.

- [x] Strongly agree
- [ ] Agree
- [ ] Neutral
- [ ] Disagree
- [ ] Strongly Disagree

2. Please provide 2-3 sentences below describing the progress of your high priority Care Redesign Interventions:

ICS combines a people-driven and technology-driven care coordination model to redesign care. The primary priority for implementation has been a significant investment in a technology product which ICS has built from scratch to enable, optimize and improve the nurses in the field who are actively managing patients and working alongside care teams. Secondly, ICS continues to enhance our clinical assessments and risk assessments to enable auto-populated 90-day care plans that are based on evidence-based guidelines, symptoms management/identification and expected outcomes - there has been significant enhancements to the clinical care model and 90-day care plans in 2019. Finally, ICS works closely with hospital(s) to transform the hospital discharge planning

3. Do you have concerns regarding implementation of any identified Care Redesign Interventions?

No

4. Please use the comment box below to provide additional details regarding successes, challenges, and/or barriers to Care Redesign Interventions.

ICS BPID 1191 experienced a significant change in practicing hospital by our PGP partners shifting almost completely from one hospital provider to another during BPCI-A implementation. This has required significant operational and implementation effort to bring the new hospital leadership and key physicians onboard with the BPCI-A program and meaningfully engage in care redesign efforts. Additionally, this has resulted in unknown target prices given this change throughout the performance period, leaving ICS with a significant "blindspot" around projected results via the monthly claims files received to date.

CEHRT Use

1. The Participant and/or the Downstream Episode Initiator(s) is on track to implement Certified Electronic Health Record Technology (CEHRT) in a manner sufficient to meet the applicable requirements of the Advanced Alternative Payment Model criterion under 42 C.F.R. & 414.1415(a)(1)(i). *To meet this criterion, at least 75 percent of eligible clinicians in each participating APM Entity group, or each hospital if hospitals are the APM Entities, to use CEHRT to document and communicate clinical care.*

Yes

2. Has the Participant had challenges meeting the CEHRT use requirements?

No

3. Please use the comment box below to describe any challenges to meeting the CEHRT use requirements.

N/A

Partner Agreements

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1. For Convener Participants: Has the Participant established agreements with all Downstream Episode Initiators (Acute Care Hospitals, PGPs)?

Yes

2. Has the Participant established agreements with all Participating Practitioners?

Yes

3. Has the Participant established processes, procedures and/or controls to validate and support monitoring of these agreements between the Participant and relevant partnering entities/individuals?

Yes

4. Please use the comment box below to describe any challenges in implementing process and procedures to monitor agreements or in establishing agreements with partners.

ICS has experienced no challenges in implementing process and procdures monitor agreements. However, to establish agreements ICS partners closely with our outside legal counsel, McDermott Will & Emery LLP (MWE) who has significant BPCI and BPCI-A experience to ensure all agreements meet all requirements of the program and other applicable federal regulations. MWE currently drafts all applicable agreements within the BPCI-A program for ICS.

Financial / Programmatic Infrastructure

1. Has the Participant set up an accounting system to be used, to measure and track Net Payment Reconciliation Amounts (NPRA) received from CMS, Repayment Amounts and Excess Spending Amounts owed to CMS and Administrative Services?

Partial; establishing accounting system

2. Is the Participant still participating in Financial Arrangements with one or more NPRA Sharing Partners?

Yes

3. Does the Participant plan to do so in the future?

N/A; already in a financial arrangement(s)

4. Has the Participant implemented all BPCI Advanced required processes and procedures related to NPRA Sharing? *For example: processes to verify Financial Arrangements comply with all applicable laws and regulations, processes to adhere to generally accepted accounting principles, compliance plan, and others outlined within the Participation Agreement.*

Yes

5. If selected 'No' to question 4, please describe any barriers/challenges in the comment box below.

ICS partners closely with our outside legal counsel, McDermott Will & Emery LLP (MWE) who has significant BPCI and BPCI-A experience to ensure all agreements meet all requirements of the program and other applicable federal regulations. MWE currently drafts all applicable agreements within the BPCI-A program for ICS.

Additionally, ICS has invested in internal data & analytics functions which continue to be enhanced to ensure proper calculations of NPRA, NPRA sharing and other program outcomes. ICS also partners with Milliman who processes all ICS claims files and NPRA files. ICS is currently working with Milliman on a process to audit and verify NPRA sharing calculations since the first BPCI-A NPRA has not

6. Has the Participant fully established NPRA Sharing Arrangements with all NPRA Sharing Partners? *[If your response to this question is 'yes', please upload your organization's NPRA Sharing Arrangement template or a populated agreement as an example to the amendment section of the Participant Portal. If you have more than one NPRA Sharing Arrangement, upload 1 example only]*

Yes

7. If selected 'No' to question 6, please explain noting any barriers or challenges.

N/A

8. Has the Participant established a BPCI Advanced Entity Agreement with a BPCI Advanced Entity?

NA; we don't have relationship with a BPCI Advanced Entity

9. Please describe key considerations that informed the Participant's decision (e.g. willingness to take on risk) regarding establishing Financial Arrangements.

ICS believes strongly in the aligned incentives motivators under AAPMs such as BPCI-A. Therefore, we believe two-sided risk is a key value provided under these models and lends credibility to our role as a convener. Related, we believe properly incentivizing our downstream partners to improve performance and directly connecting financial reward to that improved performance yields overall better outcomes for patients. We fully align with our partners through NPRA sharing agreements which recognize the unique and direct role each individual partner plays in specific areas of care redesign which is tied to well-defined metrics under each of our direct influence.

Internal Cost Savings (ICS)

1. Does the Participant plan to track and allow contribution of ICS associated with BPCI Advanced to the BPCI Advanced Savings Pool(s) in the next 12 months?

No

2. If selected 'Yes' to question 1, has the Participant established a process to measure and track Internal Cost Savings associated with BPCI Advanced?

N/A; we don't participate in ICS Sharing

Net Payment Reconciliation Amount (NPRA)

1. Does the Participant plan to share NPRA associated with BPCI Advanced in the first performance period, if savings are achieved? *[Performance Period 1: October 1, 2018 through June 30, 2019]*

Yes

2. Has the Participant implemented processes and procedures to monitor Shared Repayment Amounts associated with BPCI Advanced?

Yes

3. If selected 'Yes' to question 2, please describe your processes and procedures to monitor Shared Repayment Amounts associated with BPCI Advanced.

ICS partners closely with our outside legal counsel, McDermott Will & Emery LLP (MWE) who has significant BPCI and BPCI-A experience to ensure all agreements meet all requirements of the program and other applicable federal regulations. MWE currently drafts all applicable agreements within the BPCI-A program for ICS.

Additionally, ICS has invested in internal data & analytics functions which continue to be enhanced to ensure proper calculations of NPRA, NPRA sharing and other program outcomes. ICS also partners with Milliman who processes all ICS claims files and NPRA files. ICS is currently working with Milliman on a process to audit and verify NPRA sharing calculations since the first BPCI-A

Compliance Plan

1. Has the Participant completed an initial Compliance Plan? *[If your response is 'yes', please upload this document to the amendment section of the Participant Portal If your Compliance Plan includes multiple appendices, you can upload the main document only.]*

Yes

Waivers (Fraud & Abuse Waivers and Medicare Payment Policy Waivers)

The questions around changes to the selected waivers are included to obtain information on current status of waiver use. CMS communicated to Participants on October 16, 2018 to clarify the selection of waivers on the Participant Profile in a message titled "Participant Profile Selection Does Not Limit Use of Waivers". The use of any of the five waivers available to Participants in the BPCI Advanced Model is not contingent upon its selection on the Participant Profile template that was submitted on August 8, 2018. Even if a Participant made a selection of "No" for any given waiver, they still have the option of using the waiver and receiving its protection effective October 1, 2018.

1. Has the Participant or partners elected to use any of the Fraud and Abuse Waivers (Financial Arrangements and/or Beneficiary Incentives)?

Yes

2. Has the Participant or partners made any changes to the Fraud and Abuse Waiver use selections since you last submitted the Participant Profile? (E.g., we have not selected to use Financial Arrangements and/or Beneficiary Incentives in our most recent Participant Profile, but we have started using the waiver(s) recently.)

No

3. If selected 'Yes' to question 2, please use the Waiver Data Collection Template located on the Participant Portal to document waiver use changes at the Episode Initiator-level related to any of the following Fraud and Abuse Waivers:

   - Financial Arrangements
   - Beneficiary Incentives

   When completed, please upload the document to the amendment section of the Participant Portal.

4. Has the Participant or partners elected to use any of the Medicare Payment Policy (MPP) Waivers?

Yes

5. If you selected 'Yes' to question 4, have you implemented the Payment Policy Waiver(s)?

No

6. Has the Participant or partners made any changes to the Medicare Payment Policy waiver use selections since you last submitted the Participant Profile? (E.g., we have not selected to use any of the MPP waivers in our most recent Participant Profile, but we have started using the waiver(s) recently.)

No

7. If selected 'Yes' to question 6, please use the Waiver Data Collection template located on the Participant Portal to document waiver use changes at the Episode Initiator-level related to any of the following Payment Policy Waivers: (Please upload attachments to the amendment section of the Participant Portal)

   - 3-Day Skilled Nursing Facility (SNF) Rule
   - Post-Discharge Home Visits
   - Telehealth

8. Has the Participant established a process for monitoring compliance with waiver conditions?

NA; not using any of the waivers

9. If selected 'Yes' to question 8, please select from the list below all of the strategies your organization has used for this purpose.

   - [ ] Attestation
   - [ ] Internal audit
   - [x] N/A; we have not elected to use any waivers
   - [ ] N/A; we have elected to use waivers, but have not yet established a process for monitoring compliance with waiver conditions
   - [ ] Other

10. If selected 'Other' to question 9, please list strategies in the comment box below.

While we selected all waivers available under the program in our participant profile, we have not yet chosen to use or operationalize any of the available payment policy waivers.

Participation in Shared Learning Activities

1. Has the Participant participated in the shared learning activities (e.g., webinars, emails, town hall meetings) identified by CMS?

Yes

Knowledge Management / Record Keeping / Succession Planning

1. Does the Participant have a process in place related to records management associated with BPCI Advanced Model?

Yes

2. Does the Participant have a succession plan in place for when individuals in management or individuals who oversee implementation of the BPCI Advanced Model depart the organization?

Yes

3. If selected 'Yes' to question 2, please provide a brief explanation of that process below.

ICS employs a variety of leaders who have in-depth experience in the BPCI and BPCI-A programs as well as decades of experience within post-acute care and care coordination. Departure of one leader will not pose an issue since all leaders possess this experience. Additionally, our clinical operations department has two clinical executive leaders to protect against any issues with a single departure.

Beneficiary Notification

1. What is the primary communication channel(s) used to provide beneficiary notification? Select all that applies.

- [ ] Emailed to beneficiaries
- [x] Mailed to the beneficiary's address
- [x] Provided to beneficiary during an Inpatient Hospital stay or Outpatient Visit
- [x] Provided during discharge procedures
- [ ] Other

2. If selected 'Other' to question 1, please describe the communication channel used to provide beneficiary notifications.

N/A

3. Does the Participant use the template Beneficiary Notification Letter provided by CMS?

Yes

4. If selected 'No' to question 3, please explain.

N/A

5. Has provision of the beneficiary notification of participation resulted in negative feedback from beneficiaries?

No

6. If selected 'Yes' to question 5, what are the primary concerns from the beneficiary perspective?

N/A

BPCI Advanced Impact

1. Has the Participant seen any unexpected positive outcomes associated with implementing BPCI Advanced?

Unsure

2. Has the Participant seen any unexpected negative outcomes associated with implementing BPCI Advanced?

Unsure

3. If selected 'Yes' to either question 1 or 2, please describe.

We have not yet received our first performance period NPRA so our final results are not definitely known; however, the operational and experiential outcomes of the program have been generally as expected (caveat: the major change with PGP EIs changing hospitals during the implementation of BPCI-A which was mentioned and explained in a previous section).

4. Has the Participant established a process for monitoring and mitigating unintended consequences (*e.g., patient targeting/avoidance, inadequate or insufficient care, cost-shifting*) associated with implementation of the BPCI Advanced Model?

Yes

5. If selected 'Yes' to question 4, please describe.

ICS nurses regularly interact with patients and their families relative to the adequacy and experience of their care in all settings in which they receive care throughout the 90-day episode of care. Additionally, telephonic follow up by the ICS support team throughout the episode and once the episode ends also occurs which aim to gather information about these unintended consequences. Additionally, ICS relies on the claims data to analyze any change in patterns of care or acuity that would be unexpected in conjunction with relying on CMS' analytics process to monitor post-episode spending.

Beneficiary Impact

1. Has the Participant implemented a system to request, track and respond to complaints made by BPCI Advanced Beneficiaries? [*The complaint process in place does not have to be solely for Beneficiaries in the BPCI Advanced Model. However the current complaint system in place must track complaints made by Beneficiaries in the BPCI Advanced Model.*]

Yes; using existing system

2. If selected 'Yes' to question 1, do you believe that current processes in place appropriately monitor and address those complaints?

- [●] Strongly agree
- [ ] Agree
- [ ] Neutral
- [ ] Disagree
- [ ] Strongly disagree
- [ ] Unsure
- [ ] N/A; we have not yet implemented a system for monitoring and responding to beneficiary complaints

3. Has the Participant received any complaints related to the established system for tracking Beneficiary complaints? (E.g., a beneficiary complained that their complaint was not resolved quickly enough.)

No

4. Please select the categories to which complaints the Participant has received from BPCI Advanced Beneficiaries align. Please select all that apply.

- [ ] Quality
- [ ] Safety
- [ ] Timing and Access
- [ ] Communication
- [ ] Compassion/Caring
- [ ] Patient Rights
- [ ] Other
- [x] N/A; we have not received any complaints from Beneficiaries

Document Submission

1. Is there a designated person(s) for submitting BPCI Advanced required documentation to CMS?

Yes

2. Please provide any barriers or challenges associated with submitting required documentation.

The required quarterly QPP submission for a PGP EIs to update all participating practitioners which can number easily into the 100s is a significant administrative burden, especially for convener participants who may have multiple PGP EI partners.

3. Is there a designated person(s) for coordinating clinical document requests from the Participant and its Downstream Episode Initiators and other clinical partners?

Yes

Self-disclosed Investigations or Sanctions

1. Is the Participant or any of its BPCI Advanced partners under any investigations or subject to sanctions that have not been reported to CMS?

No

2. If selected 'Yes' to question 1, please provide written notice of any unreported investigations and/or sanctions to CMS via email (BPCIAdvanced@cms.hhs.gov). *Additional information is located under Article 13 of the Participation Agreement.*

Other Issues Not Previously Listed

1. Please describe issues, challenges or barriers associated with implementation of the BPCI Advanced Model that have not being discussed above.

ICS strongly supports the BPCI-A program and has experienced an overall positive experience and results within the program thus far.