A Patient Driven HCC Process Why All the Buzz?

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Disclaimer

- This material is designed and provided to communicate information about clinical documentation, coding, and compliance in an educational format and manner.
- The author is not providing or offering legal advice but, rather, practical and useful information and tools to achieve compliant results in the area of clinical documentation, data quality, and coding.
- Every reasonable effort has been taken to ensure that the educational information provided is accurate and useful.
- Applying best practice solutions and achieving results will vary in each hospital/facility and clinical situation.



What are HCCs?

An HCC (Hierarchical Conditions Category) is a diagnosis code driven method used to apply cost grouping based risk adjustment in categorizing clinical condition groups and/or disease burden scale.





- Statistical regression-based model
- Diagnosis code(s) determine cost risk groupings
- Counts individual interactions between high burden
 diseases
- Predicts costs for an individual for the coming year
- Estimating the financial effect of disease burden on future costs
- Analyzes post acute care services following a hospitalization
- <u>HHS HCC prospective cost analysis</u>
- <u>CMS HCC retrospective cost analysis</u>
- CMS and HHS uses surrogate (non-clinical) and clinical variables to determine RAF score

Background and history – HCC models



- Developed by CMS for risk adjustment of the Medicare Advantage Program (Medicare Part C)
- CMS also developed a CMS RX HCC model for risk adjustment of Medicare Part D population
- Based on aged population (over 65)
- Current year data predictive of future year risk

HHS HCCs (Commercial HCCs)



- Developed by the Department of Health and Human Services (HHS)
- Designed for the commercial payer population
- HHS-HCCs predict the sum of medical and drug spending
- Includes all ages
- Current year data used to predict current year risk



The trend away from fee-for-service payment



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HCCs in multiple value-based payment programs



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Annual Capitated Payment (Medicare Advantage, HIX)

Direct- RAF scores are payment multipliers for capitated payment

Bundled Payment (CMS CJR) Indirect- HCCs adjust bundled payments to account for more complex patients

Pay-for-Performance (MACRA, commercial contracts) Indirect- HCCs risk adjust VBP performance metrics (mortality, spending, safety)



Indirect -HCCs risk adjust financial benchmarks and impacts savings/risk targets



Indirect- HCCs risk adjust MIPS and APM measures, set CPC+ care management fees

Why the buzz?

- An increasing number of provider organizations hospital networks and physician practices are entering into value-based contracts with their payers.
- It is estimated that by 2030 up to 40% of patients will participate in a Medicare Advantage risk-based plan... and the number will continue to grow!
- Providers establish a contract where they are <u>paid a flat rate per patient</u>; the amount paid to cover the annual patient care is **determined based on documentation and coding.**
- The need for capturing chronic conditions qualifying as an HCC is important for both ambulatory and inpatient providers:
 - Risk adjusted diagnoses can be captured regardless of place of service
 - Patient risk score is based on their health status across the care continuum



HCC RAF calculation

Total score of all relative factors related to one patient for a year (invisible to coder and provider until RAF score for next year is determined)





HCC Risk Adjustment Factor methodology example

• 78-year-old male, community based, managing chronic conditions

2019 Risk Adjustment Factor (RAF) Score

Diagnoses documented/billed during visits in 2019

Demographic score: 2019	0.466
HCC 18: Diabetes w/retinopathy	0.302
HCC 22: Morbid Obesity	0.250
HCC 40: Rheumatoid arthritis	0.401
HCC 85: Dilated cardiomyopathy	0.331
HCC 111: COPD	0.335
HCC Interaction Score: CHF—COPD	0.190
HCC Interaction Score: Diabetes—CHF	0.154
Total RAF Score	2.429

2020 Risk Adjustment Factor (RAF) Score

Diagnoses documented/billed during visits in 2020

Demographic score: 2020	0.466
HCC 18: Diabetes w/retinopathy	0.302
HCC 22: Morbid Obesity	0.250
Total RAF Score	1.018
2020 Missing RAF Score	1.411

Capitated Pay Per Member Per Month (PMPM):				
• \$800 PMPM x 2.429 RAF = \$1943	\$13,548			
• \$800 PMPM x 1.018 RAF = \$814	Annual			

Common gaps and key steps in capturing HCCs



Face-to-face patient visit

Visit Types

- Hospital inpatient and outpatient
- Physician / NPP (NP, PA, NW, CRNA)

Exclusions:

- Hospice
- SNF
- Home health
- Free-standing ASC
- Patients missing HCCs do not have visits scheduled
- No way to identify patients
- No easy process to schedule at-risk patient for a visit



Physician addresses and diagnoses condition(s)

Providers

- Physicians
- NP, CRNA
- Psychologist/Psychiatrist

Services Excluded:

- DME
- Laboratory
- Diagnostic radiology
- Physician doesn't know what patient information is contained in disconnected EMRs
- Not all HCC-diagnoses are captured/documented



Dx coded and itemized in claim

Requirements

- Each HCC diagnosis submitted in a claim once per calendar year
- Must be supported by documentation in visit note

- Physician documents an HCC-diagnosis but does not code for it
- Providers trained to code diagnoses for pro-fee billing, not HCC capture
- 80-90% of office visits coded by providers with no coder review

HCCs must be treated, documented, coded, and billed at some point across care settings



Common concerns for health systems

Capturing population's disease burden

- Struggle to accurately document and report each patient's entire disease burden
- Under-reporting means you don't get paid for the full cost it takes to keep patient healthy
- Does your data tell the entire story of your patient?

Staff understanding of HCC methodology

- Staff do not fully understand the HCC methodology
- Traditional DRG-focused documentation programs may not emphasize the entire disease burden
- Physicians, coding, and CDI may need additional training and policies
- RAF calculation may change the way coding and claims are submitted

Lack of CDI processes in physician office

- 80% of patient care occurs in the physician office
- Physician practices have limited documentation improvement practices
- Disparate systems create difficulty identifying a longitudinal care record
- Office-based physicians do not routinely document and code for full disease burden

Accurately predicting patient costs

- Struggle to accurately predict costs
- Provider Sponsored Health Plans and/or providers with risk-based agreements need to predict costs
- These providers are looking to risk stratify patient populations to help control costs



HCC documentation requirements

HCC diagnoses

- Must be captured in a face-to-face visit by physician or NPP
- Must be appropriately documented in the medical record
- Supporting clinical evidence for all diagnoses must be documented

M.E.A.T. criteria



- Monitor Signs, symptoms, disease progression or regression
- Evaluate Review of test results, medication effectiveness, response to treatment

i.e. "stable," "improving," "exacerbation," "worsening," "poor"

- Assess Ordering tests, discussion, review records, counseling
- Treat Referral, medication(s), planned surgery, therapies

KEY TAKEAWAY: Evidence of an HCC can be obtained from any qualified document/claim. It is important that provider documentation and billing be consistent across care continuum.

HCC documentation requirements

Complete and accurate documentation is a solid foundation for risk adjustment

Example of MEAT criteria for a patient with Diabetes Mellitus:

67-year-old female with 15-year history of Type 2 DM, taking Glucophage 500mg BID. Recent lab work shows an increase in A1C. Her last three A1C results show trending upward. Will increase her Glucophage, see her in 3 months, order placed for A1C.

Monitoring - 67-year-old female with 15-year history of Type 2 DM, taking Glucophage 500mg BID.

Evaluating - Recent lab work shows an increase in A1C.

Assessing - Her last three A1C results show trending upward.

Treating - Will increase her Glucophage, see her in 3 months, order placed for A1C.



Common HCC clarification opportunities



Top 10 Most Under-Documented HCCs

- > Amputations
- > Artificial openings
- > Asthma and pulmonary disease
- > Chronic skin ulcer
- > Congestive heart failure
- > Drug dependence
- > Metastatic cancers
- > Morbid obesity
- > Rheumatoid arthritis
- > Specific type of major depressive disorder

Source: 3M aggregated claims data

Goal for each patient

- Report all current diagnoses at the highest level of specificity based on physician documentation
- The more categories of diagnoses reported over a year creates a higher risk score
- Only one diagnosis per category is used in the risk score calculation
- ✓ If both angina and AMI are reported in one year, only the AMI is scored as it is a higher level of specificity within the Heart category





Time is the most precious resource we have

Delivering high-quality care



EHR and anything that distracts from Interaction with the Patient

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The (real) cost of technology in healthcare



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Right information at the right time





Conversational AI: Closing the Loop





Explainable AI: Clinical Information Models





Real-time clinical intelligence at the point of care

Computer-Assisted Physician Documentation (CAPD)

- Real time feedback from clinical understanding platform
- Proactively encourages consistency and accuracy
- Closes care gaps, improves communication and compliance
- Personalize nudges for providers that are explainable and actionable





The power of



A comprehensive HCC program



Engage all stakeholders – Physicians, CDI, coding, quality, revenue cycle, population health – in order to define organizational goals and build support for a united front on how to build out a program to support "the shift from volume to value."



Create a sustainable process across your network and risk contracts that reduces manual or disparate functions. Prioritize patients review based on the needs of all stakeholders and goals.



Move from retrospective analysis to proactive review and management that support enterprise scalability and improve the effectiveness of the program.



Operationalize data for continuous program improvement by targeting patients, physicians, and high-value HCCs. Focus on proxy measures and leading indicators.

What problem are we trying to solve?



Engage all stakeholders – Physicians, CDI, coding, quality, revenue cycle, population health – in order to define organizational goals and build support for a united front on how to build out a program to support "the shift from volume to value."

"What diagnoses even count as HCCs? You have to make the coding work easier. My notes have all the necessary information, but the problem list is a mess."

"Remind me what I need to review for my patient during the visit. Help me to get it right the first time."

"Why can't the computer tell me the correct ICD-10 codes based on my documentation?" "Which patients have the greatest opportunity for HCC capture remaining this year? Our RAF scores do not reflect the actual population severity of illness."

"We need a workflow to review patients before their visit... our retrospective review is not cutting it."

"We're building an OCDI program but don't have the resources to cover our growing risk-based population."



Problems \rightarrow Goals \rightarrow Process \rightarrow Results



Create a sustainable process across your network and risk contracts that reduces manual or disparate functions. Prioritize patients review based on the needs of all stakeholders and goals.



Right information to right person at right time



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Proactive Physician Engagement



- Automated, patient-specific, real-time feedback through industry leading CAPD
- Identifies and summarizes the most appropriate ICD-10 codes based on patient history and current documentation
- Ensure documentation compliance, billing accuracy, and appropriate patient severity of illness scores the first time!
- Ability customize additional HCC and CDI actionable messages and EHR integrations



Right information to right person at right time



Pre- and Post-Visit CDI Review



- Prioritized worklist based on RAF gaps, outpatient visit schedule, HCC opportunities
- NLU evidence sheets summarize findings from clinical documentation and claims in order to streamline longitudinal medical record reviews
- Workflow for sending automated provider notifications and reviewing compliance postvisit and before final billing
- Tools for follow-up and retrospective analysis by CDI, coding, quality, and population health

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Operationalize data focused on proxy measures



Utilization MonitoringCDS and provider scorecards, daily and weekly reports detailing activity in HCC Engage
and HCC Collaborate to trend activity and monitor for those in need of retrainingAction ReportsDetailed information focused on specific follow up opportunities to drive RAF capture,
reconfirmation rate and audit risk mitigation

Outcomes AnalysisMonthly and year-over-year tracking of progress compared to baseline and trends in
cohort groups (payer, provider, location)





Nudge Theory:

By presenting options with relevant information at the right time, **people make wiser decisions** without losing their freedom of choice.

A *nudge* [...] is any aspect of the choice architecture that alters people's behavior in a predictable way without forbidding any options or significantly changing their economic incentives [...] To count as a nudge, the intervention must be cheap and easy to avoid. MORE THAN 1.5 MILLION COPIES SOLD

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HCC Management: Leveraging technology and data to scale process and drive outcomes

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OCDI review of the highest priority patients and HCC opportunities

Process

Make the longitudinal HCC chart review process efficient, automated

Shift from retrospective analysis to proactive outreach and support

Ensure patient diagnosis are captured as specifically as possible

Highlight areas for ongoing improvement throughout the year

Reviews are completed timelier, with improved productivity and coverage

Improve efficiency for physicians and CDI to close HCC gaps

Drive data quality for improved care and communication

Ensure patient RAF scores are accurate and appropriate

Support the shift from acute response to chronic disease



3M M*Modal HCC Management

3M M*Modal HCC Management is a technology driven solution that leverages artificial intelligence (AI) to uncover clinical insights that support appropriate risk adjustment. Integrated into a workflow for both physicians and outpatient clinical documentation integrity specialists, HCC Management provides –

- Proactive, real-time, automated provider feedback
- Prioritized patient chart review (pre- and post-visit)
- Detailed analytics for comprehensive analysis

This unique solution presents healthcare providers up-to-date visibility into the population, supporting the annual capture of HCC diagnoses, in order to accurately represents a patient's burden of illness across the care continuum.





3M M*Modal HCC Management

Goals

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- □ Save physicians and CDI time leverage technology to drive efficiency, reduce redundancy, and eliminate waste
- Optimize program workflow ensure reviews focus on greatest opportunities to drive outcomes (clinical and financial)
- Capture accurate RAF scores support the most appropriate riskbased reimbursement that represents actual burden of illness
- □ Lead improvements in healthcare support the shift from volume (FFS) to value (pop health management)
- Drive higher quality data capture enable improved patient care and communication with data that reflects care provided



THANK YOU

