

# Patient-Centered Medical Home (PCMH) 2022 Program Description & Guidelines – Pediatric Medicine

## Key Terms and Definitions

|                                                 |                                                                                                                                                                |
|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Assessment Outcome</b>                       | Formal assessment completed by Pediatrician and Care Manager of Members on the Identification Stratification List                                              |
| <b>Collaborative Panel</b>                      | A CareFirst-made Panel for Pediatricians who are unable to find their own Panel                                                                                |
| <b>Credits</b>                                  | A Panel's Performance Year budget, or expected cost of care of their attributed Members                                                                        |
| <b>Debits</b>                                   | Allowed amount of health care spend for Members attributed to a Panel in the Performance Year                                                                  |
| <b>Designated Provider Representative (DPR)</b> | PCP lead for the Panel who has certain administrative responsibilities                                                                                         |
| <b>Episode of Care Debit Overlap</b>            | 50% of the shared savings earned by specialists in an Episode of Care value-based model that is applied back to a Panel's Patient Care Account                 |
| <b>Identification Stratification Population</b> | Group of CareFirst Members who meet specific criteria related to care coordination needs                                                                       |
| <b>Individual Stop Loss</b>                     | Portion of Gross Debits representing 100% of costs Per Member Per Year above \$50,000 debited back to the Patient Care Account                                 |
| <b>Member</b>                                   | CareFirst beneficiary of Medical, and Pharmacy benefits                                                                                                        |
| <b>Member Months</b>                            | The number of individual months a CareFirst Member is attributed to a PCMH Panel                                                                               |
| <b>Outcome Incentive Award</b>                  | Portion of shared savings awarded to eligible Panels who meet savings to budget, quality score, care coordination, and attribution requirements                |
| <b>Overall Medical Trend</b>                    | Change in the total cost of care over time for CareFirst Members with the CareFirst Medical Benefit                                                            |
| <b>Overall Pharmacy Trend</b>                   | Change in the total cost of pharmacy claims for the CareFirst Members with the CareFirst Pharmacy Benefit                                                      |
| <b>Panel</b>                                    | Group of Primary Care Providers formed for participation in the PCMH Program                                                                                   |
| <b>Panel Governance</b>                         | CareFirst committee that reviews Panel structure, appeals and exceptions                                                                                       |
| <b>Participation Incentive</b>                  | 12 percentage point increase to standard base fee schedule for Providers participating in the PCMH Program                                                     |
| <b>Patient Care Account</b>                     | A report that presents a Panel's budget and total health care spend in a performance year                                                                      |
| <b>Performance Year</b>                         | The measurement period for PCMH ranging from January 1 <sup>st</sup> through December 31 <sup>st</sup> of any given year                                       |
| <b>Persistency</b>                              | Increase in Outcome Incentive Award total for Panels who earn an Outcome Incentive Award multiple years in a row. Awarded at levels of 2, or 3+ years in a row |
| <b>Provider Directory</b>                       | A list of providers contracted to participate in the CareFirst Network, available to CareFirst Members                                                         |

## Panel Size

A Panel, or group of Pediatricians, is the basic performance unit of the Pediatric PCMH Program (“Program”), forming a team where one otherwise may not exist. PCMH Participation Incentives and Outcome Incentive Awards (OIAs) are based on the performance of Panels.

To form a Panel, Pediatricians must organize into a group of five to 15. A Panel may be formed by an existing group practice, small independent group practices, and/or solo practitioners that agree to work together to achieve Program goals. When a Panel is between five and 15 Pediatricians, it is large enough to reasonably pool member experience for the purpose of pattern recognition and the generation of financial incentives, yet small enough for each Pediatrician’s contribution to be perceived as meaningful. The idea is to tie rewards as directly as possible to individual Pediatrician performance while providing enough experience to support sound conclusions about overall performance for each Panel.

Nurse Practitioners (NPs) are considered to be Pediatricians and count towards the minimum of five Pediatricians required to comprise a Panel.

Practices that exceed 15 Pediatricians but practice in the same location may request in writing to CareFirst an exception to form one Panel. This request will be reviewed by Panel Governance to determine the appropriateness of the exception based on the following criteria.

1. Panel Viability
2. Geography
3. Panel Cohesion/Accountability
4. Point in the Performance Year of the Request

CareFirst reserves the right to deny additions that result in Panels larger than 15 Pediatricians in size.

If the termination of a practice or individual Pediatrician within the Panel causes a Panel to fall below minimum participation requirements of five Pediatricians, the Panel will have up to one year to restore itself to the minimum participation level of five Pediatricians.

## Panel Viability

For performance results to be credible, a Panel must have a minimum level of 15,000 attributed Member Months over the course of the Performance Year, or an average of 1,250 attributed Members per month. This is the point at which a Panel is considered viable and therefore eligible to earn an OIA.

There may be some instances when Panels are not able to reach the number of attributed Members needed to be viable while staying within the permissible range of five to 15 Pediatricians per Panel. For example, a Panel located in a geographic area with a low volume of CareFirst Members may not have enough Members to be considered viable. In these instances, the Panel may request to add additional Pediatricians, with the approval of CareFirst, to exceed the 15 Pediatrician maximum and achieve a viable Panel size.

In some circumstances, a pediatrician may have difficulty finding a Panel to join. In these instances, CareFirst will assign a Pediatrician to a PCMH Collaborative Panel. Practices joining the PCMH Program without a prospect to become a viable Panel that meets the Program requirements are agreeing to be placed in a Collaborative Panel. The Collaborative Panels will be constructed to ensure viability requirements are met. As such, CareFirst may construct a Panel that exceeds the 15 Pediatrician maximum and may be geographically spread.

CareFirst reserves the right to deny the addition of Pediatricians beyond 15 and addition of any Pediatrician to a Collaborative Panel.

## Panel Composition

A Pediatrician is eligible for this Program if (s)he is a healthcare provider who: (i) is a full-time, duly licensed medical practitioner; (ii) is a participating provider, contracted to render primary care services, in both the CareFirst BlueChoice Participating Provider Network (HMO) and the CareFirst Regional Participating Preferred Network (RPN); and (iii) has a primary specialty in:

- Pediatrics
- Family Practice (Pediatric Members Only)
- Nurse Practitioners – Pediatrics

No partial group practices are accepted into the PCMH Program. All practitioners who function as a pediatrician must join the Program or the practice will not be accepted. In addition, all providers in the same practice must participate in the same

provider networks. Those who do not function as a pediatrician – such as those who are “floaters” or see urgent care/sick care – should not enroll in the PCMH Program.

Multi-specialty groups may also join the Program, but for the purposes of Panel formation and enhanced payments, only the Pediatricians in such practices may participate. If a pediatrician who is part of multispecialty group practice seeks to join the Program, all qualifying Pediatricians within the practice must agree to join in order to qualify for Program participation.

CareFirst considers NPs to be critical providers of primary care services and an option for enhanced access for CareFirst Members, and NPs are encouraged to participate in the PCMH Program. NPs who bill for professional services in their own name will have Members attributed to them, just as any other Pediatrician, earning the 12 percent Participation Incentive and OIA if eligible. Alternatively, NPs who bill “incident to” a physician in the practice will not have any attributed Members, as these Members will appear under the name of the physician under whom the NP is billing.

NPs must comply with all statutory and regulatory obligations to collaborate with or operate under the supervision of a physician pursuant to applicable state and local laws. The inclusion of NPs is intended to provide Members with an expanded choice of providers. Physicians collaborating with NPs participating in the Program must also participate in the PCMH Program.

NPs may also form a Panel of their own, independent of physicians.

## Panel Types

There are five types of Panels participating in the PCMH Program.

**Virtual Panel:** A Virtual Panel is a voluntary association of small, independent group and/or solo practices formed by contract with CareFirst. The Pediatricians in the Panel agree to work together to provide services to CareFirst Members, use each other for coverage and work as a team in improving outcomes for their combined CareFirst population. CareFirst reviews and approves the formation of all Virtual Panels. Pediatricians in these Panels should practice within a reasonably proximate geographic distance from each other to ensure meaningful interactions among pediatrician Panel members.

**Independent Group Practice Panel:** An Independent Group Practice Panel is an established group practice of Pediatricians who can qualify as is, because the practice falls within the required size range of five to 15 Pediatricians.

**Multi-Panel Independent Group Practice:** A Multi-Panel Independent Group Practice is a practice with more than 15 Pediatricians that is not employed by a Health System. All such practices are required to identify segments of five to 15 Pediatricians that constitute logical parts of the larger practice – for example, pediatric or adult, and/or by location. CareFirst reviews and approves the division of the practice into constituent Panels.

**Multi-Panel Health System:** A Multi-Panel Health System is under the ownership of a hospital or health system and consists of more than 15 Pediatricians. All such systems are required to identify segments of five to 15 Pediatricians that constitute logical parts of the larger system – typically by location and population served. CareFirst reviews and approves the division of the system into constituent Panels.

**Collaborative Panel:** Collaborative Panels are formed at CareFirst’s sole discretion. In these instances, CareFirst will assign a Pediatrician to a PCMH Collaborative Panel in order to meet a Member attribution count of 1,250 or greater. As CareFirst will assign Pediatricians to these Panels, the Pediatricians of a collaborative Panel may not decide to remove a Pediatrician from the Panel. These Panels are not required to meet in person and may participate in Panel meetings by teleconference. All other Program requirements will remain the same for Collaborative Panels, including Quality Scorecard, engagement and savings to budget requirements to earn an OIA.

## Panel Peer Types

To ensure more meaningful and consistent comparisons in Panel performance and data reporting, Panels are assigned to an Adult or Pediatric peer group, effective in 2019. Separate, customized programs have been established for Adult and Pediatric Panel Peer Types. Mixed Panels have been eliminated. Pediatricians caring for Members of all ages will only be measured on their Members in the corresponding peer type.

## PCP Access

Pediatricians must be accessible to all CareFirst Members. However, there are times when a Practice or an individual Pediatrician is “closed” (not accepting new Members) due to capacity limits. A practice or individual Pediatrician within the PCMH Program is required to have an open Practice unless they are closed to all payers. If a practice is open to any other payer for any of its networks, it must be open to all CareFirst Members. However, a practice/Pediatrician may have an open practice for CareFirst and a closed practice for other payers.

## Concierge Practices

Pediatricians who require CareFirst Members to participate in a private fee-based program on a concierge basis or require Members to pay any type of retainer, charge, payment, private fee or purchase additional benefits in order to receive services from the Pediatrician, other than the deductibles, co-pays and coinsurance under the terms of the Member’s CareFirst benefit contract, do not qualify for the Program.

Pediatricians who charge any fees for supplemental services beyond those covered by CareFirst, and who warrant that the fees charged are strictly voluntary and not required, must agree to and comply with the following conditions, in writing, before acceptance into the Program:

1. The Panel Pediatricians must make it clear that no fee, charge or payment of any kind is required of a CareFirst Member in order to become and/or remain a Member attributed to the Pediatrician or medical practice (other than the payment of ordinary deductibles, co-pays and co-insurance under the member’s CareFirst benefit contract);
2. There must be no differences in the treatment, care, access, responsiveness, engagement, communications, etc., provided to CareFirst Members who do not pay the fee compared to those who pay the fee;
3. The Panel Pediatricians must set up office procedures and processes in such a way that a Member could not misconstrue a voluntary fee for supplemental services as a requirement to receive covered services; and
4. The Panel Pediatricians must recognize and agree that CareFirst maintains the right to audit compliance with these assurances, which may include a survey of the Pediatricians and medical practices’ members who are CareFirst Members.

If CareFirst determines that any Pediatrician or medical practice has not abided by these requirements, the Pediatrician, medical practice and/or Panel will be subject to immediate termination from the Program and will forfeit any additional reimbursements or incentives they may otherwise be entitled to.

Exceptions to the rules regarding concierge practices may be negotiated on a case by case basis according to CareFirst’s need for access in a particular geography or to meet particular market needs.

## Online Connectivity and Systems Requirements for Pediatricians

The PCMH Program is designed to empower Pediatricians and/or their Care Management Team(s) with the tools and data to effectively manage the care of their members without placing a technology burden on the practice. The PCMH Searchlight System is available via CareFirst's provider website. Member level detail is available in the Care Management Platform, Guiding Care via the PCP's Director of Regional Care Management.

To access the CareFirst Provider Portal, a valid User ID/Password is required, in addition to a computer meeting standard internet access with a current browser. Please contact CareFirst Help Desk (410-998-6400) or [ProviderCFDAccess@carefirst.com](mailto:ProviderCFDAccess@carefirst.com) for additional assistance.

## Eligibility for PCMH Participation Incentive

A Panel or practice becomes effective in the PCMH Program 60 days following CareFirst's receipt of a complete PCMH application and signed network contract addendum from the whole Panel. Enrollment with a retroactive date is not allowed.

Once effective, CareFirst will add 12 percentage points to professional fees for all practices in the Panel as an incentive for participation in the Program, known as the Participation Incentive. The Participation Incentive continues for as long as PCPs in the Panel meet all engagement requirements and Quality Scorecard minimums, as discussed below in the Quality Measurement Program Requirements section. Participation Incentive and OIAs (if any) do not apply to time-based anesthesia, supplies and injectable drug fees/billings. These additional fees are advance payments intended to fund the practice's work on transformation, including time to meet with CareFirst staff, reviewing data, and redesigning workflow to achieve optimal outcomes and value in the Program. If Panels do not invest in a way that achieves outcomes and value, the Participation Incentive is at risk of reduction or elimination. More details can be found in the Eligibility for Participation Incentive section below.

One note to be clear: The 12-percentage point Participation Incentive is added to Base Fees, not multiplied against them, and may be reduced if certain conditions are not met.

The Participation Incentive is contingent upon meeting quality score and engagement requirements in the PCMH Program and will terminate upon the effective date of a practice's or Panel's termination from the Program. In this event, the payments to the practice will revert to the then-current CareFirst HMO and RPN fee schedules applicable to the practice without any incentives or Participation Incentives.

## Measuring a Panel's Total Cost of Care vs. Trend Target

Success in the PCMH Program is determined by a Panel's ability to keep the global spend within a yearly trend target. An expected budget is set each Performance Year, built from the Panel's global medical and pharmacy spend in a base period, and adjusted for changes in Overall Medical Trend and Overall Pharmacy Trend, the relative risk of the Panel's patient population, and the Panel's attributed Members.

## Base Period

The Base Period for Panels is the average Per Member Per Month (PMPM) Medical and Pharmacy Costs from a two-year period prior to the Performance Year. In PY2019, CareFirst moved to a two-year rolling Base Period no more than three years prior to the Performance Year. The two-year Base Period reduces volatility and reflects the realities of changes in the local health market. At the start of each Performance Year, the Base Period will shift forward one year and will be restated using the Panel's current PCP composition, lessening the impact of market shifts and adjusting for provider movement across Panels.

### COVID-19 Adjustment

The 2022 Performance Year was originally anticipated to have a Base Period of 2019 and 2020. The impact of the COVID-19 pandemic on 2020 costs and utilization makes 2020 an inappropriate year to be included in the Base Period for the 2022 Performance Year. As a result, the Base Period for the 2022 Performance Year will remain 2018 and 2019. Overall Medical Trend, Pharmacy Trend, and Illness Burden will be adjusted forward from 2018 and 2019, and all adjustment for changes in Panel composition will be applied as described above.

## Risk Adjustment

Since the start of the PCMH Program, CareFirst has used the industry leading DxCG Intelligence to calculate the Medical Illness Burden Score (IBS) for Medical Budget calculation. In an effort to further align with local and national value-based programs, the PCMH Program made plans in PY2020 to move to U.S. Department of Health and Human Services (HHS) Hierarchical Condition Category (HCC) Coding to measure risk. After a detailed analysis of both risk adjustment tools, it was determined that DxCG model captures a larger set of diagnosis and is a more precise risk adjustment tool for setting Panel budgets. DxCG will continue to be used to set PCMH Panel budgets in PY2022 and moving forward.

Although HHS-HCC risk scores are used in the ACA risk transfer program to offset the population risk differences between insurance carriers within a market, these scores were not intended to be applied for smoothing risk across smaller populations. The scores may not have the same level of precision when used for this purpose. The HHS-HCC risk score model focuses on adjusting for risk associated only with selected high-cost diagnoses, whereas the DxCG model captures many more diagnoses and reflects a more accurate risk level for individuals.

Pharmacy budgets will be risk adjusted independently for Pharmacy Benefit Members based on the industry standard Pharmacy Risk Grouper which calculates Pharmacy Burden Scores (PBS). Panels' Performance Year budgets are adjusted based on changes in the risk of these two populations from Base Period to Performance Year.

## Member Attribution

Attribution of Members will occur on a monthly basis using a 24-month claims lookback period. Plurality of PCP office visits will determine the attributed provider for each Member. Claims history is used to determine a plurality of visits first over the most recent 12 months and then, if necessary, over the preceding 12 months. In the case of a tie for either period, attribution is assigned to the provider with the most recent visit. Effective 2021, Member self-selection will no longer be used to attribute Members to Panels. Therefore, in the case of no visits in the 24-month period, a Member will remain unattributed until they visit a PCMH PCP. Attribution for Adult Panels will be restricted to Members age 18 and older, while attribution for Pediatric Panels will be restricted to ages 20 and younger.

PCMH Attribution will supersede attribution for all other CareFirst value-based programs.

A visit will only impact attribution if an evaluation and management code is submitted from a primary care place of service. Video and audio only calls may impact attribution if the appropriate evaluation and management codes are submitted. Vaccinations, such as COVID-19 and flu shots, or COVID-19 testing will not impact attribution unless an evaluation and management service is included.

## Setting Budget Targets

Budgets for the 2022 Performance Year will be calculated using the Base Period (2018 and 2019) PMPM Medical and Pharmacy costs. Those PMPMs are then risk adjusted and trended forward to create the budget for the 2022 Performance Year population. In 2022, CareFirst will use actual Medical and Pharmacy trends specific to CareFirst's pediatric population. At the start of the Performance Year, a trend target will be established to set the Panel's budget and will be adjusted to match the actual trend at the end of the Performance Year. Trends will be set

based on the portion of health care spending controlled by the owner of the Panels, as described below. Trend targets will adjust each year to bring growth in health care costs in line with wage inflation.

- Independent Panels
  - Medical: CareFirst Medical trend minus 1 percentage point
  - Pharmacy: CareFirst Rx trend minus 1 percentage point
- Health System Panels
  - Medical: CareFirst Medical trend minus 2 percentage points
  - Pharmacy: CareFirst Rx trend minus 2 percentage points

Adult Panels participating in the PCMH Program will have a trend factor based on the CareFirst trend specific to the adult population. See the Adult Program Description & Guidelines for details on the Adult Program.

## Pediatric Exclusions

Some routine and catastrophic costs are excluded when creating the budget targets described above in order to effectively measure success within a pediatric population. The rationale for each exclusion is described below.

### Required and Preventive Care

Pediatricians encounter a large and growing body of requirements each year, particularly for Members under the age of two. A Panel is not successful if they reduce cost by sacrificing evidence-based care. Practices should have the ability to accept newborns without fearing they will be negatively impacted. Therefore, starting in 2019, required and preventive care will be budget neutral and excluded from the Base Period and Performance Year through the age of two.

CareFirst developed a list of required and preventive care based on American Academy of Pediatrics guidelines, analysis of claims data from our pediatric Members, and input from our Pediatric Medical Advisors. The list includes immunizations, well-child visits, wellness screenings, and other routine preventive procedures.

With the understanding that some of this care may not be provided exactly by the 2<sup>nd</sup> birthday, there will be a grace period of two months built into the exclusions.

Additionally, vaccines will be excluded from the Panel budgets regardless of the age of the patient when service is rendered.

The full list of excluded services and relevant CPT codes can be provided upon request. These services are excluded in the Base Period and the Performance Year when billed for a Member aged 26 months or younger.

### Newborn Admissions

Admissions that occur within 14 days of life will remain excluded. Often these admissions are direct transfers to the NICU—occurring before the Pediatrician has established a relationship with the Member—and cannot be prevented.

Additionally, newborn admissions tend to disproportionately impact health system Panels adept at managing complex Members.

### Catastrophic Costs (Individual Stop Loss)

In most Pediatric Panels, very ill Members are rare. One or two can skew a budget. Specialists are often the primary caregivers in these cases, reducing the opportunity for co-management.

In order to mitigate the impact of outliers, Individual Stop Loss (ISL) Protection has been applied at 100% once a Member reaches a predetermined value. In continuing to evolve the Pediatric PCMH Program in response to feedback from providers, we have decided to keep the ISL at a stable value of \$50,000 in total spend for a Performance Year. In other words, for 2022, costs are capped at \$50,000 for Members attributed to Pediatric Panels. This new change will allow pediatric providers to stay focused on preventive care costs and feel empowered to make the best decisions needed for their more complex patients.

Panels and pediatric providers are still responsible for Members that reach the cap from a quality perspective and are expected to utilize our clinical programs to support their care as appropriate.

## Calculating Savings to Budget

Savings compared to expected is calculate at the end of the performance for each Panel. Panels that have less net Debits than Credits may be eligible to share in the savings in the form of an Outcome Incentive Award (OIA). The net Debits is the total allowed amount for the attributed patient population of the Panel in the Performance Year minus the Individual Stop Loss and Episode of Care Debit Overlap.

## Episode of Care Debit Overlap

In 2021, CareFirst launched new value-based programs for specialties that manage episodes of care for Members attributed to PCMH Panels. Because these models will operate in parallel, CareFirst Members attributed to PCMH may have discrete episodes with multiple providers operating in episode-based incentive agreements independent of one another. Reductions in overall cost of specialist-driven episodes benefit PCMH Providers. For this reason, any incentives paid to specialists will count toward the total cost of care budget for PCMH Panels but it should be noted that incentives are only paid when a specialty practice makes measurable improvement in the management of episodes versus their prior history.

## Quality Measurement Program Requirements

In addition to cost savings to budget, Panels must achieve clinical quality measures to be successful in the PCMH Program. CareFirst has selected quality measures that drive the most impactful health outcomes and align with those of other payers' programs where possible to maximize provider focus and minimize conflicting coding burdens.

### CareFirst Core Pediatric Measures

Measures will now include process-based and outcomes-based measures collected through claims and clinical data sharing. Measures may require attestation and clinical data sharing in order for a Panel to achieve all Quality Scorecard points. Details of the inclusion and exclusion criteria for each measure can be found in the CareFirst Core Playbook. The 2022 CareFirst Core Measures for Pediatric Panels are shown below.

| 2022 PCMH Pediatric Core Measures                          | Source | HEDIS Measure ID | Measure Point Value |
|------------------------------------------------------------|--------|------------------|---------------------|
| <b>1. Well-Child Visits</b>                                |        |                  | 15                  |
| Well-Child Visits in the First Fifteen Months of Life      | NCQA   | W30              | 5                   |
| Well-Child Visits in the First Thirty Months of Life       | NCQA   | W30              | 5                   |
| Child and Adolescent Well-Child Visits                     | NCQA   | WCV              | 5                   |
| <b>2. Immunizations for Adolescents - Combination 2</b>    | NCQA   | IMA              | 15                  |
| Tetanus, Diphtheria Toxoids and Acellular Pertussis (Tdap) | NCQA   |                  |                     |
| Meningococcal                                              | NCQA   |                  |                     |
| Human Papilloma Virus (HPV)                                | NCQA   |                  |                     |



|                                                                                                   |                          |     |    |
|---------------------------------------------------------------------------------------------------|--------------------------|-----|----|
| <b>3. ED Utilization - 18 years and above</b>                                                     | NCQA                     | EDU | 10 |
| <b>4. Appropriate Treatment of Children with Upper Respiratory Infection</b>                      | NCQA                     | URI | 10 |
| <b>5. Appropriate Testing for Children With Pharyngitis</b>                                       | NCQA                     | CWP | 10 |
| <b>6. Screening for Depression</b>                                                                | CareFirst Custom Measure | BHE | 10 |
| <b>7. Follow-Up for Behavioral Health Care Composite</b>                                          |                          |     | 10 |
| Follow-Up After ED Visit for Mental Illness (7 days) - With Any Practitioner                      | NCQA                     | FUM | 5  |
| Follow-Up After Hospitalization for Mental Illness (7 days) - With Behavioral Health Practitioner | NCQA                     | FUH | 5  |

All claims-based measures are from NCQA HEDIS and points are awarded in tiers based on national and peer benchmarks. No points will be awarded for Panels failing to meet the first tier of each measure, roughly the 25<sup>th</sup> percentile.

The Pediatric Clinical Quality Scorecard with tiered quality score benchmarks will be available in SearchLight.

Panels must achieve at least 65% of the 100 total clinical quality points to receive the full Participation Incentive and to be eligible for an OIA. This represents the 50<sup>th</sup> percentile in total Clinical Quality Scorecard points.

| MEASURES                                                                                            | PANEL SUMMARY    |                 |                   |                        |              | BENCHMARKS                        |                     |                     |                     |                      |
|-----------------------------------------------------------------------------------------------------|------------------|-----------------|-------------------|------------------------|--------------|-----------------------------------|---------------------|---------------------|---------------------|----------------------|
|                                                                                                     | Points Available | Points Obtained | Compliant Members | # Member Opportunities | % Compliance | Not Tiered (0 Points)             | Tier 4 (50% Points) | Tier 3 (65% Points) | Tier 2 (80% Points) | Tier 1 (100% Points) |
| <b>WELLNESS / PREVENTIVE CARE</b>                                                                   | 30               |                 |                   |                        |              | % COMPLIANCE TO ACHIEVE EACH TIER |                     |                     |                     |                      |
| Well-Child Visits                                                                                   | 15               |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| - Well-Child Visits in the First Fifteen Months of Life                                             | 5                |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| - Well-Child Visits for Age 15 Months - 30 Months                                                   | 5                |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| - Child and Adolescent Well-Care Visits                                                             | 5                |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| • 3-11 years                                                                                        |                  |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| • 12-17 years                                                                                       |                  |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| • 18 years and above                                                                                |                  |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| Immunizations for Adolescents - Combination 2                                                       | 15               |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| - Tetanus, Diphtheria Toxoids, and Acellular Pertussis (TDAP/DT)                                    |                  |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| - Meningococcal (MCV4)                                                                              |                  |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| - Human Papillomavirus for Adolescents (HPV)                                                        |                  |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| <b>CARE OF ROUTINE CHILDHOOD ILLNESS</b>                                                            | 15               |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| ED Utilization - 18 years and above                                                                 | 5                |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| Appropriate Treatment of Children with Upper Respiratory Infection                                  | 5                |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| Appropriate Testing for Children With Pharyngitis                                                   | 5                |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| <b>BEHAVIORAL HEALTH CARE</b>                                                                       | 20               |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| Behavioral Health Evaluation                                                                        | 10               |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| Follow-Up for Behavioral Health Care Composite                                                      | 10               |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| - Follow-Up After ED Visit for Mental Illness (7 days) - With Any Practitioner                      | 5                |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| - Follow-Up After Hospitalization for Mental Illness (7 days) - With Behavioral Health Practitioner | 5                |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| Overall Clinical Score                                                                              | 65               |                 |                   |                        |              |                                   |                     |                     |                     |                      |
| Overall Clinical Rate                                                                               |                  |                 |                   |                        |              |                                   |                     |                     |                     |                      |

### Engagement Program Requirements

In Performance Year 2022, Panels will no longer be scored on PCP Engagement at the Panel level. However, engagement in the PCMH Program is still a requirement and expectation for participation and OIA eligibility. Replacing the Panel level Engagement Scorecard will be a set of Panel, practice, and provider requirement that must be met to receive an OIA and retain the full Participation Incentive.

#### PCP Engagement Requirements

1. Each Practice completes PCMH Practice Survey in Q1 of the Performance Year.
2. Each Panel identifies a Designated Provider Representative (DPR) who helps set Panel’s expectations, co-leads PCMH discussion, and signs off on changes to Panel structure.
3. Each Practice identifies a Care Management Lead that collaborates with Care Managers to identify members with the care management needs and fulfills the expectations of care management. (More details below)
4. All PCMH providers in a practice complete CareFirst Health Equity Training by July 1, 2022. (more details below)

**Care Management Expectations**

PCP engagement with care coordination continues to be critical for success in the PCMH Program. Monthly review of members on the Identification and Stratification List remains a standard and integral part of the care management process. The Care Management Lead at each practice is expected to engage in the following:

- Create an environment that is conducive to collaboration with CareFirst Care Manager and instructs staff to support Member identification and care management referrals.
- Establish a monthly clinical status review workflow with CareFirst Care Manager to review members with care management needs and refer members to CareFirst Care Manager.
- Ensure CareFirst Care Manager has access to needed clinical information and provides EMR access when available.

Director of Regional Care Management will notify the provider of any engagement concerns identified and work collaboratively with the provider to help the practice meet the Care Management engagement requirement. Failure to meet the above expectation will result in the practice not meeting PCP Engagement Requirement #3. Continued lack of engagement in care management, as determined by CareFirst in its sole discretion, may result in termination from PCMH as described in the Termination for Failure to Engage in Care Coordination section of the Program Description and Guidelines.

**Health Equity Training**

As racial and ethnic disparities in health continue to grow, CareFirst is committed to advancing health equity to all residents in the jurisdictions we serve. Patient centered care must accommodate an increasingly diverse patient population. In 2022, all PCPs in PCMH Panels will be expected to complete the CareFirst Health Equity Training found online at the CareFirst Learning and Engagement Center (link coming soon).

Failure to complete the four engagement requirements detailed above will result in the practice becoming ineligible to receive an OIA and a reduction in Participation Incentive as described in Eligibility for Participation Incentive section of the PD&G.

**Eligibility for Outcome Incentive Awards**

The Pediatric PCMH Program pays substantial incentives to those Panels that demonstrate favorable outcomes and value for their Members. These incentives are called Outcome Incentive Awards (OIAs). All such incentives are expressed as add-ons to the professional fees paid to Pediatricians who comprise Panels who earn an OIA.

Practices must meet the conditions below to be eligible for an OIA:

1. The practice must be in a PCMH Panel that joined the Program on or before July 1<sup>st</sup> of the Performance Year. If the Panel joins after this date, it will not be eligible for an OIA until the following Performance Year.
2. The practice must be in a PCMH Panel that meets viability requirements by having at least 15,000 Member Months for the Performance Year.
3. The practice must be in a PCMH Panel that has a cost savings to budget in their Patient Care Account (i.e., Credits must exceed Debits).

4. The practice must be in a PCMH Panel that achieved a minimum of 65% of the quality points available (50<sup>th</sup> percentile compared to national benchmarks) on the Clinical Quality Scorecard.
5. The practice must meet all four engagement requirements.

OIAs are effective August 1 of the year following the Performance Year (e.g., August 1, 2023 for Performance Year #12 - 2022) and remain in place for a full year until July 31 of the following year (e.g., July 31, 2024.). In order to be paid an OIA, the practice must participate in the PCMH Program throughout the incentive pay out period (August 1st - July 31st) following each Performance Year.

All OIAs earned by each practice are added on top of Base Fees and Participation Incentives.

OIAs are always calculated at the Panel level based on savings, quality score, Panel size, and date of Panel formation. Individual practices within a Panel will be ineligible for an OIA if any or all providers in the practice do not meet the four PCP Engagement Requirements. All other practices in a Panel that meet conditions one through five above will be eligible for an OIA.

Panels that are part of a larger entity may request to be paid their OIA at the entity level. The entity may elect to be paid this aggregated OIA amount based on combined, weighted results for all Panels (including non-viable and ineligible Panels) or be paid separate OIAs for each winning Panel. A group may alter this choice in advance of each Performance Year upon 60 days written request to CareFirst before the start of each Performance Year.

For a Panel that joins the Program within the first six months of the Performance Year, any earned OIA will be prorated based on effective date of Panel’s entry into the Program as shown below.

**Proration of Outcome Incentive Award (OIA)**

| Effective Date | Prorated Percentage |
|----------------|---------------------|
| 1/1            | 100                 |
| 2/1            | 92                  |
| 3/1            | 83                  |
| 4/1            | 75                  |
| 5/1            | 67                  |
| 6/1            | 58                  |
| 7/1            | 50                  |

OIA fees and the Participation Fees will cease immediately upon termination of a practice’s participation in the Program and/or termination of a Panel from the Program.

**Outcome Incentive Award Calculation**

The OIA is the intersection of cost savings to budget and PCMH Clinical Quality Scorecard results. The incentive awarded back to the Panel is designed to be roughly one third of the Panel’s savings. Panels can achieve a higher OIA by earning a higher Clinical Quality Score, winning multiple years in a row, and having a larger Panel attribution. The OIA formulas are described below. Quality Score represents the Panels clinical attainment rate on the PCMH Clinical Quality Scorecard plus any improvement bonus points.

**OIA Formulas Based on Panel Size and Win Years**

| <i>Duration*</i>        | <u>Average Members</u> | <u>Outcome Incentive Award</u>                                            |
|-------------------------|------------------------|---------------------------------------------------------------------------|
| <i>Pediatric Panels</i> |                        |                                                                           |
| 1                       | <b>3,000+</b>          | Fee Increase = [(Quality Score + 30)/100] * <b>2.25</b> * % Savings       |
| 1                       | <b>2,000-2,999</b>     | Fee Increase = [(Quality Score + 30)/100] * <b>1.90</b> * % Savings       |
| 1                       | <b>1,250-1,999</b>     | Fee Increase = [(Quality Score + 30)/100] * <b>1.69</b> * % Savings       |
| 2                       | <b>3,000+</b>          | Fee Increase = [(Quality Score + 30)/100] * <b>2.25</b> * %Savings * 1.10 |
| 2                       | <b>2,000-2,999</b>     | Fee Increase = [(Quality Score + 30)/100] * <b>1.90</b> * %Savings * 1.10 |
| 2                       | <b>1,250-1,999</b>     | Fee Increase = [(Quality Score + 30)/100] * <b>1.69</b> * %Savings * 1.10 |
| 3+                      | <b>3,000+</b>          | Fee Increase = [(Quality Score + 30)/100] * <b>2.25</b> * %Savings * 1.20 |
| 3+                      | <b>2,000-2,999</b>     | Fee Increase = [(Quality Score + 30)/100] * <b>1.90</b> * %Savings * 1.20 |
| 3+                      | <b>1,250-1,999</b>     | Fee Increase = [(Quality Score + 30)/100] * <b>1.69</b> * %Savings * 1.20 |

## Pediatric Quality OIA

Pediatric Panels can also be rewarded for providing high quality of care. Even without savings against their budget the top decile of Pediatric Panels based on clinical quality score will be awarded 5 points on their fee schedule as a Quality OIA if they meet all other OIA eligibility criteria.

## Eligibility for Participation Incentive

Participation Incentives are intended to fund the providers’ time and attention to the Program and to assure front line providers are properly informed of utilization, savings to budget and Quality Scorecard results necessary to drive transformation leading to better outcomes and value for the CareFirst population.

Practices can earn their 12-point Participation Incentive by engaging in practice transformation and by sharing all PCMH utilization, budget, quality scorecard and OIA data with PCPs. Practices who do not complete the four PCP engagement requirements will lose all or portions of their Participation Incentive based on market size category as shown below. Panels that do not meet a minimum of 65 percent of the points available on the Clinical Quality Scorecard, and do not achieve a savings, will also lose all or portions of their Participation Incentive based on market size category. Panels and practices that save compared to expected and meet PCP Engagement Requirements but fall below 65 percent on the Clinical Quality Scorecard will retain the full 12 percent Participation Incentive but will not be eligible for an OIA. Adjustments for practices losing all or part of the 12 Points will go into effect in August of 2023 based on 2022 Performance.

The amount of the Participation Incentive at risk is dependent upon the size of the practices within Panels and their influence over the larger health care market. Six points will be at risk for independent, primary care centric practices, and for Panels part of independent, multi-specialty practices, and 12 points for Panels part of multi-hospital health systems.

### Determining market size category

- Entrepreneurial and Corporate (6pts): All virtual Panels, single site independent Panels, and multi-site independent Panels
- Health System (12pts): Multi-Hospital health systems and/or hospitals that employ a comprehensive range of specialties.

Entrepreneurial and Corporate Panels who fail to meet eligibility for the Participation Incentive two years in a row will risk the remaining six points, bringing the Participation Incentive to 0 percent, and will remain at 0 percent until engagement and Clinical Quality Scorecard minimums are met. Panels who lost all or a portion of the Participation Incentive are eligible to

receive the full 12 percentage point Participation Incentive upon meeting all eligibility requirements in the next Performance Year.

Changes in Participation Incentive will be effective on August 1st of the year following the Performance Year (e.g., August 1, 2023 for Performance Year #12 - 2022) and remain in place for a full year until July 31 of the following year (e.g., July 31, 2024.)

## Changes in Panel Composition

A variety of circumstances may arise over time that may impact Provider membership of a Panel or practice. Panels or practices may dissolve, change their provider membership via attrition or termination, or allow Pediatricians to leave and join other Panels.

A Pediatrician may change Panels for any reason, including a change in his/her practice location or a change in his/her affiliation with a particular practice. In this case, the Pediatrician may join another Panel in the new location, or another practice that is part of Virtual Panel.

The following rules govern these Panel changes:

1. If a Panel's participation falls below five Pediatricians it must, within one year, increase its membership to five or more or the Panel will lose OIA eligibility for the Performance Year. If the Panel participation falls below five Pediatricians for a full year, the Panel will be terminated from the Program. Exceptions may be granted with written request through Panel Governance.
2. A Panel may request an exception to the upper limit of 15 Pediatricians in writing. For an exception to be granted, the Panel must demonstrate that the Panel practices as a cohesive unit and must provide compelling justification as to why such larger size would not unduly diminish the contribution of each Pediatrician to overall Panel performance.
3. Multi-Panel Independent Group Practices and Multi-Panel Health Systems may choose to have an OIA paid at the entity wide tax identification number (TIN) level, notwithstanding the fact that all OIAs are determined at the Panel level as a Program requirement. In the situation, all Panels under the same TIN will receive a single OIA, determined by the weighted average of each Panel, weighted on size of Panel Debits.
4. If a new Pediatrician or practice joins an existing practice, the reimbursement level of the existing practice will be assumed by the new Pediatrician or practice, including the Participation and OIA Incentive fees (if any), once the new Pediatrician has signed on to the PCMH Program. A new Pediatrician joining an existing practice will only be considered to be a member of the Panel on a prospective basis. No retroactive enrollment is allowed.
5. If a pediatrician leaves a Panel but remains in the CareFirst HMO and RPN networks without participating in another Panel, the Pediatrician will lose the Participation Incentive and OIA incentive fees at the point they terminate from the Panel.
6. If a Panel changes ownership or Tax ID, but the actual Pediatricians making up the Panel remain the same, the Panel will be treated as having continuous participation in the PCMH Program for the purposes of OIA and persistency awards.
7. Any practice that joins a Panel is required to be an active PCMH participant of that Panel during the last two complete calendar quarters of the current Performance Year to be eligible for an OIA. That is, only practices that actively participate in the Program by July 1 of the Performance Year are eligible for an OIA for that Performance Year. If a practice joins a Panel after July 1, that practice is excluded from the OIA for that Performance Year. A practice will be considered active in the Pediatric PCMH Program once the practice has signed both a Panel contract and the PCMH Addendum to their network agreement with CareFirst. A retroactive enrollment date is not allowed for practices that are new to PCMH.

8. Acceptance of a practice into an existing Panel requires unanimous agreement by the Panel, communicated in writing to CareFirst by the Panel's Designated Provider Representative (DPR).
9. If a practice leaves a Panel after the end of a Performance Year, joins another Panel and remains in good standing with the Program, the practice will keep the OIA earned in the previous Panel.

## Appeals

Any Pediatrician or Panel as a whole may submit a letter to CareFirst requesting review of any aspect of the calculation of an OIA that they believe to be made in error. CareFirst will promptly (within two weeks) contact the Pediatrician and Panel to discuss the information submitted with the request as well as any other pertinent information. Following a thorough review, CareFirst will notify the appealing Pediatrician and/or Panel of its response in writing within 90 days of the receipt of complete information from the Pediatrician and/or Panel.

CareFirst will make corrections in Panel results if any errors are found. In carrying out corrections, CareFirst may provide a correction on a prospective basis or on a retrospective basis, depending on the circumstances of the particular case.

The deadline to submit an appeal for the 2022 Performance Year is September 1, 2023.

## Signing on with PCMH

Participation in the Program is entirely voluntary. There is no penalty or negative impact on existing CareFirst fee payments for network RPN and HMO PCPs or practices who elect not to participate.

Each Pediatrician (or the practice to which they belong) will be required to sign an Addendum to its CareFirst RPN and HMO Participation Agreements.

If a pediatrician applying for participation in the Program is in an established large group practice that contains more than 15 Pediatricians, the practice and CareFirst will agree on the way the practice will be divided into Panels prior to the effective date of Program participation.

If a Pediatric applicant is in a solo practice or a small practice and wishes to participate in the Program by joining another Panel(s) or practice(s) as part of a Virtual Panel, then all of the Pediatricians who would make up the Virtual Panel must sign a PCMH enrollment form indicating that they are voluntarily forming a Virtual Panel for the purposes of the Program and are attesting to their commitment to work individually and collectively toward Program goals. If a Virtual Panel is not formed, the practice will be added to a Collaborative Panel at CareFirst's sole discretion.

All Pediatricians within a practice who submit claims to CareFirst for payment under a single tax ID number must join so that all participate in the Program. Any division of the practice into Panels made for performance tracking purposes as described above does not affect this participation requirement.

Each Practice must designate a lead Provider or Staff member called a Practice Point of Contact to act as a primary point of contact between the Panel and CareFirst.

As stated above, practices receive formal PCMH Recognition by CareFirst immediately upon execution of the Participation Agreements, as defined by PCMH designation in the CareFirst Provider Directory.

## Termination from PCMH

A Practice may terminate its participation in the Program upon ninety (90) calendar days' prior written notice to CareFirst for any reason.

A Panel may terminate participation in the Program with ninety (90) calendar days' prior written notice to CareFirst for any reason. This will terminate all participants within such Panel from the Program unless they join another Panel. If a pediatrician in a practice terminates participation in the Program, but does not terminate from the practice, the practice will be terminated from the Program. Notwithstanding this requirement, in the case of a pediatrician who is recalcitrant with Program engagement, an individual Pediatrician may be terminated from the PCMH Program. Once the Pediatrician is terminated, they will no longer receive the participation fee or OIA.

A Virtual Panel may change its self-selected team of PCPs at any time if it continues to meet the minimum size requirements of the Program and notifies CareFirst. The consent of at least three-fifths (3/5) of the PCPs in the Virtual Panel is required to forcibly remove a practice from the Panel. A letter from the Panel's Designated Provider Representative (DPR) is required to be sent to the practice that was voted to be removed informing them of the Panel's decision. A Collaborative Panel may not choose to remove any PCP from the Panel, however CareFirst can remove PCPs whose lack of participation and cooperation with Panel goals is harming Panel performance.

CareFirst may immediately terminate a practice, Pediatrician and/or Panel from the Program under the following circumstances with written notice, unless the termination is related to the discontinuance of the entire Program (which requires 90 calendar days' prior written notice):

1. The practice, PCP and/or Panel repeatedly fails to comply with the terms and conditions of the Program.
2. The practice, PCP and/or Panel has substantial uncorrected quality of care issues.
3. Termination of either the Master Group Participation Agreement, or the Primary Care Physician Participation Agreement which terminates the Group's, Pediatrician's and/or Panel's participation in CareFirst's RPN or HMO networks.
4. Any other termination reason set forth in the termination provisions of the underlying Participation Agreements within the applicable notice periods set forth therein.

The payment of the Participation Fee and any OIA will immediately terminate upon the effective date of the Pediatrician's, Group's or Panel's termination from the Program, regardless of the reason for termination.

## **Termination for Failure to Engage in Care Coordination**

CareFirst may also terminate a Pediatrician or practice for persistent failure to engage in the care coordination components of the Program upon due notice and consultation in accordance with the process outlined below.

A Pediatrician or practice that persistently fails to engage with the care coordination components of the Program will be terminated from the Program. The Director, Regional Care Management or (DRCM), who is the PCMH Program lead for Care Coordination, will have oversight of the termination process as it relates to lack of engagement. When the DRCM determines that a pediatrician or practice, despite multiple in person visits to the Pediatrician's office, fails to engage, the DRCM will begin the process of terminating the Pediatrician from the Program.

As a first step in the termination process, the Pediatrician or practice that is not engaging with the components of the Program will receive a 90-day warning letter from the DRCM, reminding him or her of the requirements for continued participation. This is the first of three letters sent with a copy to the other Panel members. This letter identifies the termination date if engagement with CareFirst does not occur, as defined as an in-person meeting with the DRCM and or Practice Consultant to discuss and agree to all requirements for participation in PCMH as defined in the PCMH Program Description and Guidelines. If the Pediatrician or practice is still unwilling to engage after 30 days, the DRCM will send the Pediatrician or practice a final warning letter stating that termination from the Program will result from continued non-engagement. If the Pediatrician or group still does not engage as described above, the Pediatrician or group will be notified that termination will occur on the date originally presented in the 90-day letter and termination will occur on that date.

If the Pediatrician or practice begins to engage with the care coordination components of the Program, as described above, during the termination process, the DRCM may suspend the termination process. The termination process may be reinstated if the Pediatrician or Group does not sustain their Engagement with the components of the Program.

The payment of the Participation Fee and any OIA will immediately terminate upon the effective date of the Pediatrician's, Group's or Panel's termination from the Program regardless of the reason for termination.

## **Disqualification of Participants**

In the event that a CareFirst Pediatric PCMH practice does not meet the participant qualifications as defined above in the Panel Composition section of the Program Description and Guidelines, it must provide immediate notice to CareFirst whereupon the practice will be disqualified from participation in the Program. All PCMH related financial incentives will cease for claims with dates of service on or after the Pediatrician's, Practice's, or Panel's termination date.