

Guide to Quality Measurement for Accountable Care Organizations Starting in 2012: Agreement Period, Performance Year, and Reporting Period

Introduction

The purpose of this document is to provide clarification on the quality reporting timeframes and reporting requirements for Accountable Care Organizations (ACOs) participating in the Medicare Shared Savings Program (Shared Savings Program). This guidance is directed toward Shared Savings Program ACOs that have an agreement period with a 2012 start date and will review key terms from the regulations, including agreement period, performance year, and reporting period.

Background

On November 2, 2011, the Centers for Medicare & Medicaid Services (CMS) finalized new rules¹ under the Patient Protection and Affordable Care Act (Affordable Care Act) establishing the Shared Savings Program under which doctors, hospitals, and other health care providers may work together to better coordinate care for Medicare patients through an ACO. The Shared Savings Program will reward ACOs that lower their growth in health care costs while meeting the quality performance standard.

Before an ACO can share in any savings generated, it must meet the quality performance standard. To do so, CMS will measure quality of care using 33 measures in 4 key domains:

- Patient/caregiver experience (7 measures)
- Care coordination/patient safety (6 measures)
- Preventive health (8 measures)
- At-risk population:
 - Diabetes (6 measures)
 - Hypertension (1 measure)
 - Ischemic Vascular Disease (2 measures)
 - Heart Failure (1 measure)
 - Coronary Artery Disease (2 measures)

Of these 33 measures, 7 are collected via patient survey, 3 are calculated via claims, 1 is calculated from the Medicare and Medicaid Electronic Health Records (EHR) Incentive

¹ Medicare Program; Medicare Shared Savings Program: Accountable Care Organizations; Final Rule, 76 Fed. Reg. 67802.

Program data, and 22 are collected via the ACO Group Practice Reporting Option (GPRO) Web interface. A complete list of the measures is available at: http://www.cms.gov/sharedsavingsprogram/37e_Quality_Measures_Standards.asp#TopOfPage

As stated in 42 CFR 425.608(c)(8) quality performance for the first year of reconciliation is based on complete and accurate reporting of all quality measures, for calendar years 2012 and 2013. Therefore, ACOs will be required to completely and accurately report on all 33 measures for all reporting periods in each performance year of their agreement period. As described in the final rule, the quality reporting standard for the first performance year is pay for reporting. This means that ACOs will receive full credit for quality reporting as long as they accurately submit the measures via the ACO GPRO. Pay for performance for these measures will be phased in starting with the second performance year.

Agreement Period and Performance Year

The length of the Shared Savings Program agreement period is 3 performance years. The final rule establishing the Shared Savings Program defines a performance year as the 12-month period beginning on January 1 of each year during the agreement period, unless otherwise noted in the ACO’s agreement. For a Shared Savings Program ACO with a start date of April 1, 2012 or July 1, 2012, the ACO’s first performance year is defined as 21 months or 18 months, respectively (Table 1).

Table 1. Dates for Each Performance Year and Reporting Period for Shared Savings Program ACOs by Entry Date and Timeline for Phase-in of Pay for Performance

ACO Start Date	Performance Year 1 Reporting Period 1	Performance Year 1 Reporting Period 2	Performance Year 2 Reporting Period 3	Performance Year 3 Reporting Period 4
Shared Savings Program ACOs (April 2012 start)	April 1, 2012 to December 31, 2013 <i>January 1, 2012 to December 31, 2012</i>	April 1, 2012 to December 31, 2013 <i>January 1, 2013 to December 31, 2013</i>	January 1, 2014 to December 31, 2014 <i>Same</i>	January 1, 2015 to December 31, 2015 <i>Same</i>
Shared Savings Program ACOs (July 2012 start)	July 1, 2012 to December 31, 2013 <i>January 1, 2012 to December 31, 2012</i>	July 1, 2012 to December 31, 2013 <i>January 1, 2013 to December 31, 2013</i>	January 1, 2014 to December 31, 2014 <i>Same</i>	January 1, 2015 to December 31, 2015 <i>Same</i>
Pay for Reporting / Pay for Performance	Pay for Reporting	Pay for Reporting	Pay for Performance phase-in	Pay for Performance phase-in

The first performance year for these ACOs has two reporting periods for the purpose of quality measurement. Beginning with performance year 2, the performance years will align with the 12 months of a calendar year.

Quality Reporting Period

To participate in the Shared Savings Program, ACOs must report all 33 quality measures during each reporting period, defined as the calendar year from January 1 to December 31 (42 CFR 425.502). An ACO that fails to report quality measure data accurately, completely, and on a timely basis may be subject to termination or other sanctions.

For the 2012 reporting period, the ACO will be required to report on beneficiaries assigned to the ACO, and the ACO GPRO will be populated based on a sample of the 2012 assigned beneficiaries. Quality data for the 22 measures reported via the ACO GPRO for the 2012 reporting period will also qualify eligible ACO participant TINS to receive the Physician Quality Reporting System (PQRS) incentive under the Shared Savings Program, as discussed in II.F.5. of the final rule. Requiring ACOs to report a full 12 months of GPRO quality data also aligns the reporting period for earning a PQRS incentive under the Shared Savings Program with the traditional PQRS.

In addition, for all ACOs starting in the Shared Savings Program in 2012, CMS will conduct a Consumer Assessment of Healthcare Providers and Systems (CAHPS) survey with assigned ACO beneficiaries and will measure the claims-based and EHR Incentive Program payment quality measures for informational purposes. Quality performance for the interim payment calculation will be based on the GRPO quality data reported for calendar year 2012, as discussed in II.G.2.k. of the final rule.

Summary

All quality measures will have a 12-month, calendar year reporting period, regardless of ACO start date. This means that while the first performance year for a Shared Savings Program ACO with an April 1, 2012 or July 1, 2012 start date will be 18 or 21 months for purposes of the calculation of shared savings, quality data will be collected on a calendar year reporting period basis, beginning with the reporting period starting January 1, 2012 through December 31, 2012.

The ACOs that begin their agreement in April or July 2012 will qualify for the 2012 PQRS incentive under the Shared Savings Program by satisfactorily reporting the ACO GPRO measures for the full 2012 PQRS calendar year reporting period (Table 1). After the first performance year, all subsequent performance years and reporting periods will be synchronized to be on the same calendar year cycle. The pay for performance phase-in of measures and second performance year and third reporting period for shared savings purposes will begin on January 1, 2014.