### **Overview of PTAC's Proposal Submission Instructions**

June 30, 2022

Please refer to the <u>Proposal Submission Instructions</u> for additional information regarding submitting proposals to PTAC.

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**Overview** 

#### Introduction

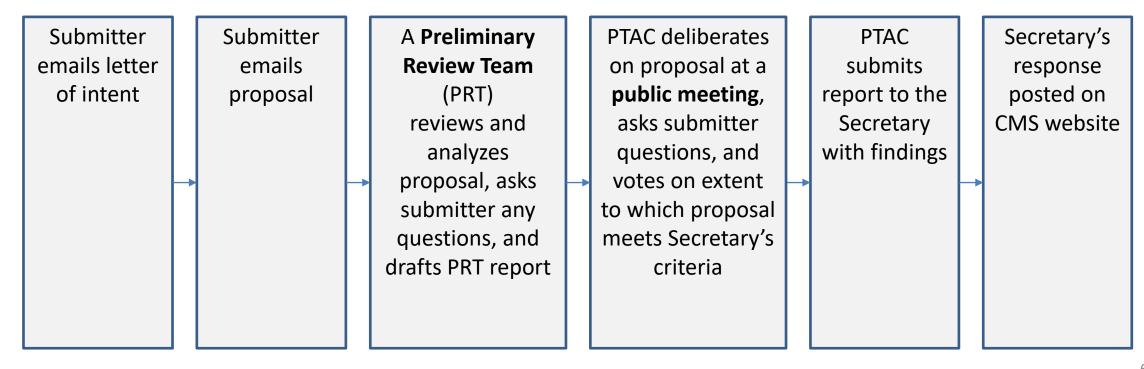
- The Physician-Focused Payment Model Technical Advisory Committee (PTAC) was created under the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) as a means to:
  - Solicit (and obtain expert review of) proposals from individuals and stakeholder entities for new Medicare physician-focused payment models (PFPMs)
  - Provide expert comments and recommendations on these proposals to the Secretary of Health and Human Services (HHS; "the Secretary")
- Additionally, PTAC seeks to ensure that stakeholders have a forum for conveying their ideas on how to deliver higher-value care.

#### Introduction, cont.

- PTAC's proposal review process involves evaluating stakeholdersubmitted proposals based on the 10 criteria set forth by the Secretary.
- PTAC may also extend its expert opinion to further inform the Secretary about certain issues or factors that a given proposal raises and/or identify alternative approaches relating to the proposed model.
- The <u>Proposal Submission Instructions</u> describe the process for submitting proposals for new PFPMs to PTAC, and how best to craft these proposals to help ensure a timely and effective review.

#### **Overview of PTAC Proposal Submission and Review Process**

Submitting a proposal to PTAC provides an opportunity for stakeholders to share their innovative ideas with the broader policy community and receive feedback during a public deliberation on their proposal by the Committee's members.



#### **Two-Track Process for Proposal Review**

- PTAC recognizes that stakeholders who develop and submit a PFPM proposal have varying degrees of resources available, which can influence their ability to address certain criteria in detail (most notably, payment methodology). Therefore, stakeholders may submit proposals for consideration in one of two tracks:
- **Track 1:** The standard PTAC proposal review process, in which PTAC votes on both the extent to which the proposal meets each of the Secretary's 10 criteria as well as on an overall recommendation to the Secretary regarding the proposal.
  - Most appropriate for proposals that include most or all of the information elements address the 10 criteria.
- Track 2: The process in which the full Committee will not vote on an overall recommendation
  regarding the proposal because there is insufficient information for PTAC to be able to fully and
  comprehensively deliberate on the proposal.
  - Most appropriate for proposals that may raise important care delivery, payment, or policy issues, but may have varying amounts of resources available, which can affect their ability to address certain criteria in detail.

#### **Updates as of June 2022**

#### PTAC has updated the <u>Proposal Submission Instructions</u> to:

- Provide additional flexibility in how submitters may describe their proposals
- Include the Committee's insights about innovative care delivery, payment,
   and policy issues that may be particularly relevant for PFPM proposals
- Ensure that each proposal includes a brief summary of key elements, including information about provider eligibility, patient eligibility, the accountable entity, the care delivery model, and the payment model
- Include Appendices that provide additional information about PTAC's proposal review process

**How to Submit a Proposal to PTAC** 

#### Who May Submit a Proposal?

- Any individual or organization may submit a proposal.
- There is no limit on the number of proposals that a stakeholder may submit.
- If a stakeholder is resubmitting a proposal that was previously submitted to PTAC, the proposal should include a brief description of up to one page specifying the changes that have been made. Please refer to the <a href="Proposal Submission Instructions">Proposal Submission Instructions</a> for information regarding submitting multiple proposals.

### When a Proposal May Be Submitted

- PTAC accepts proposals at any time but requests that stakeholders first submit a nonbinding letter of intent (LOI) at least 30 calendar days in advance of submitting a proposal.
  - After the 30-day period, stakeholders may submit the corresponding proposal at any time; submissions will be accepted on an ongoing basis.
- If a proposal is not received within six months of the LOI, the LOI will be considered "expired."
  - If an LOI has expired, submitters can submit a new LOI, which can have the same content as an expired LOI.

### **How to Send a Proposal to PTAC**

Proposals must be submitted to PTAC via email at <a href="PTAC@hhs.gov">PTAC@hhs.gov</a> in either PDF or Microsoft (MS) Word format.

- Additional information in MS Excel or PDF format may also accompany submissions of proposals.
- For details on what to include when emailing a proposal, see the <u>Proposal</u> Submission Instructions.

#### **How to Describe Your Proposal**

- Submitters may organize and present their proposals in any manner they believe is most clear, concise, and effective.
- PTAC believes that the most effective proposals describe information such as:
  - The care delivery and/or payment problem(s) the proposal aims to address, and if applicable, why they can't be fixed under existing Medicare policies and procedures
  - The proposed care delivery and payment model described in as much detail as possible
  - Anticipated effects of the proposed model from the perspective of the beneficiary
  - How the proposal will satisfy each of the Secretary's 10 criteria for PFPMs
- Please refer to the <u>Proposal Submission Instructions</u> for additional information regarding how to describe your proposal.

#### **Administrative Requirements for Proposals**

- Regardless of how a submitter chooses to organize a proposal, all proposals must:
  - Include a one-page transmittal letter from the submitter
  - Include a cover page
  - Include an abstract and table of contents
  - Include a summary of key model elements
  - Adhere to prescribed formatting for the main body of the proposal
  - Use appendices as needed
- The main body of the proposal is not to exceed 25 pages, excluding any citations and appendices.
- If resubmitting a proposal, include a brief summary specifying the changes that have been made.

**How PTAC Evaluates Submitted Proposals** 

#### **Secretary's 10 Criteria for PFPMs**

### PTAC evaluates submitted proposals using 10 criteria for PFPMs established by the Secretary in regulations:

- 1. Scope
- 2. Quality and Cost
- 3. Payment Methodology
- 4. Value over Volume
- 5. Flexibility
- 6. Ability to Be Evaluated
- 7. Integration and Care Coordination
- 8. Patient Choice
- 9. Patient Safety
- 10. Health Information Technology

#### **Information Considered in PTAC's Evaluation Process**

- PTAC conducts its evaluations by reviewing information submitted with each proposal.
- PTAC also considers additional information from various sources, such as clinical consultants, subject matter experts, literature reviews, and/or data analyses.
- To assist all submitters in putting forth their best evidence about how their proposal
  will satisfy the Secretary's criteria, the <u>Proposal Submission Instructions</u> include
  examples of information that could be included in a description of a proposed model.
- PTAC recognizes that there are varying degrees of resources available to stakeholders
  who seek to develop and submit a PFPM proposal. PTAC assesses proposals holistically
  and does not require proposals to be flawless in every respect to merit evaluation by
  PTAC.

#### **After a Proposal is Submitted\***

- When a proposal is submitted, a **Preliminary Review Team (PRT)** consisting of a subset of PTAC members will conduct a preliminary evaluation of the proposal and write a report to the full PTAC for use in the full PTAC's review and deliberation on the proposal.
- The Committee will deliberate on the proposal during a **public meeting**, at which the PRT will present its findings to the full Committee on the extent to which the proposal meets the Secretary's criteria, and the submitter will have an opportunity to make a public statement and respond to questions from the Committee. PTAC members will deliberate and score the proposal on each of the criteria established by the Secretary.
- Following the public meeting, ASPE staff, in consultation with the full Committee will
  draft a report to the Secretary reflecting the Committee's findings. MACRA requires the
  Secretary to review PTAC's comments and recommendations on proposals and to post a
  detailed response to those comments and PTAC's recommendations.

<sup>\*</sup> Please refer to the <u>Proposal Submission Instructions</u> for additional information about PTAC's proposal review process.

**Appendix** 

#### **Resources for Stakeholders**

**ASPE PTAC Website** 

**PTAC Proposal Submission Instructions** 

Common Alternative Payment Model (APM) Approaches: Reference Guide

**PTAC Email Listserv**