Physician-Focused Payment Model Technical Advisory Committee LOI: Environmental Scan and Relevant Literature

LUGPA Integrated Practices Comprehensive Care Letter Dated: 4/14/2017 Letter Received: 4/17/2017

The Large Urology Group Practice Association (LUGPA) is a trade association that represents independent urology group practices in the U.S. LUGPA proposes an alternative payment model (APM) that will create episode-based payments for newly diagnosed prostate cancer patients with localized disease and have designed an episode-based payment that aligns incentives for physicians to pursue active surveillance in clinically appropriate patients, allowing these patients to avoid unnecessary interventions. The APM will incentivize patient-physician shared decision-making, compensating physicians for the management time and active surveillance. Practices would be eligible for a performance-based payment if they met certain quality thresholds and if total episode spending is less than the benchmark.

The goal of this APM will optimize outcomes, increase beneficiary satisfaction, and reduce utilization of unnecessary services, while decreasing healthcare spending relative to the current payment system, thereby optimizing both the value and quality of care for newly diagnosed localized prostate cancer patients. The model will include patients with early stage prostate cancer with risk profiles that meet predetermined criteria who would begin their episodes of care at initial prostate cancer diagnosis. The model will be accessible to both independent- and hospital-based urology practices, enabling broad national participation in this APM. The model will include financial parameters to enhance the feasibility of participation by small practices. Also, as more than 40 percent of prostate cancer diagnoses occur before age 65 LUGPA expects that payers other than Medicare will have substantial interest in this model.

Key Search Terms

APMS; CMS; Independent Practice; Collaboration; LUGPA APM; Large Urology Group Practice Association (LUGPA); MACRA Episode-Based Cost Measure; MACRA Final Rule; Medicare; MIPS; Prostate Biopsies; Prostate Cancer; Quality Payment Program (OPP); Specialization; Specialty-focused APMs; Surgical Pathology Services; Urologist Self-Referral; Urology Group Compensation; Urology Practices; Value-based Care; Value-based Care Reimbursement

Research Task	Section	Contents
Environmental Scan	Section 1	Key documents, timely reports, grey literature, and other materials gathered from internet searches (5).
Relevant Literature	Section 2	Relevant literature materials (2).
Related Literature	Section 3	Related literature materials (1).
Poforoncos	Section 4	References to environmental scan, relevant, and related
References	<u>Section 4</u>	literature.

Section 1. Environmental Scan

Environmental Sca	n	
Key words: Medicare; APM; MACRA Implementation; Urology Practices; Quality Payment Program;		
Value-based-Care Reimb	ursement	1
Organization	Title	Date
Health Payer	Communication Key for Transition to Alternative	1/3/2017
Intelligence	Payment Models	1/3/2017
	Purpose/Abstract	
Background: Along with health insurers, more and more providers are expected to transition to alternative payment models (APMs), especially due to MACRA's Quality Payment Program. For example, urology group practices are likely to adopt advanced alternative payment models under the Quality Payment Program in future years, since the trade organization LUGPA began collaborating with cloud-based technology vendor, Integra Connect, to design alternative payment models. Summary: In this article, Dr. Neal Shore, president of LUGPA, spoke to HealthPayerIntelligence.com to explain how MACRA legislation and the Quality Payment Program have pushed providers, along with commercial payers, to adopt alternative payment models. He stated that there are only a few advanced APMs being implemented via the Quality Payment Program and none among urology practices. However, LUGPA will be moving forward with assisting urology providers in establishing alternative payment models by working with stakeholders and government agencies.		
Additional Notes/Comments		
Information on the LUGPA press release is available at <u>LUGPA and Integra Connect Announce 2017</u> <u>Urology-Centric APMs Initiative</u>		

Environmental Sca	n	
Key words: MACRA; CMS	; APMs; Urology Practices	
Journal	Title	Date
Reviews in Urology	The State of Independent Urology	2016
	Purpose/Abstract	
 Background: With MACRA in place, urologists will now need urology-specific APMs in which to participate. Without these, urologists will be at a financial disadvantage in the future, in that there will be potential financial penalties for lack of APM participation; moreover, lack of participation will deprive practices of the opportunity to grow revenues through these innovative reimbursement models and risk sharing. Summary: An important evolving focus of LUGPA will be to facilitate and assist in the development of APMs that can be utilized by integrated urology practices. Independent and integrated practices are well positioned to help develop APMs due to experience providing coordinated and cost-effective care to our patients. LUGPA is in the early stages of a multipronged approach to investigate and develop APMs in cooperation with other medical societies, academia, and industry partners. Going forward, it is critical that the urologic community work in concert to actively engage CMS in the rulemaking process as it implements the landmark MACRA legislation. 		
Additional Notes/Comments		

Environmental Sca	า	
Key words: Independent	Practice; Collaboration; Value-based Care; Specialize	ation; Urology Group
Compensation		
Journal	Title	Date
Reviews in Urology	Urology Group Compensation and Ancillary Service Models in an Era of Value-based Care	2016
	Purpose/Abstract	
Background: Changes inv workflow, productivity, c regulatory documentation physician consolidation in medical specialties, and in models have accelerated investing in enterprises t well as non-physician-ow The looming and dramat affect urology group com Summary: Implementing assist urology groups in a been historically encount quality approach to care group leadership and sta coordination, cultural de care and management. In order to adequately align patient populations. Cha effective, a transition pro- paradigms. Rather than i invest time and energy, a formulae.	volving the health care economic landscape have aft ompensation structures, and culture. Ongoing Fede in and imminent payment-changing methodologies into larger practices, creating affiliations with hospit integrated delivery networks. As subspecialization a , independent medical groups have broadened anci- hat compete with hospital-based (academic and nor- med multispecialty enterprises, for both outpatient ic shift from volume- to value-based health care com- pensation arrangements and productivity formulae new payment algorithms alongside comprehensive addressing the health care economic cost and qualit- tered with fee-for-service systems. Improving a com- is a necessary step for implementing value-based ca- keholders will need to adjust internal processes, me pendency, and organizational structures in order to n response, ancillary services and patient throughpu in quality measurement and reporting systems across inge and payment model evolution cannot happen in pocess is needed for urology groups to process the ne- mmediately moving toward a value-based structure and emphasize streamlined communication in order	fected physicians' ral legislation regarding have encouraged als, multidisciplinary nd evolution of care llary service lines by nacademic) entities, as and inpatient services. npensation will assuredly care coordination will y challenges that have prehensive payment and are metrics. Urology ethods of care create better systems of it will need to evolve in s provider footprints and nstantaneously. To be ew value-based e, urology groups must to undo ingrained

Additional Notes/Comments

Environmental Sca	n	
Key words: CMS; MACRA Final Rule; MIPS; APMS; Specialty-focused APMs		
Organization	Title	Date
Centers for Medicare		
Medicaid Services	LUGPA Comment Letter re MACRA Final Rule	12/13/2016
(CMS)		
	Purpose/Abstract	
Background: LUGPA sub	mitted a public comment to CMS on the Final Rule I	mplementing the Merit-
based Incentive Payment	t System (MIPS) and Alternative Payment Model (AF	PM) Incentive under the
Physician Fee Schedule, a	and Criteria for Physician-Focused Payment Models	(PFPMs).
Summary: LUGPA genera	ally supported the policy changes made by CMS in the	ne Final Rule; however,
the following concerns w	vere conveyed:	
(1) The misalignmer	it of incentives for both specialists and primary care	physicians with respect
to resource use o	calculations for new treatment modalities;	
(2) Limitations on th	le metrics used to assess a provider's "resource use"	under the MIPS,
eliminating a pro designed to mea	statectomy measure and applying a faulty "total co sure the costs of care in ACO models;	st of care" measure
(3) Lack of sufficient	specialty-focused APMs and diminishing the role of	f PTAC (LUGPA stated that
in the Final Rule,	CMS subsumes the PTAC process into its existing Cl	MMI process for
evaluation and a	pproving APIVIS);	formar" novmants will be
distributed; and	The methodology by which MPS exceptional per	onner payments will be
(5) The missed oppo	ortunity to implement regulatory changes to the phy	vsician self-referral law (or
the Stark Law).		
	Additional Notes/Comments	
https://www.regulations	.gov/document?D=CMS-2016-0060-4020	

Environmental Sca	n	
Key words: APM; PFPMs; MACRA; CMMI; Specialty-focused Care Models		
Organization	Title	Date
Centers for Medicare Medicaid Services (CMS)	LUGPA Comments to CMS Re MACRA	6/27/2016
	Purpose/Abstract	
Background: LUGPA submitted a public comment to CMS offering suggestions to assist in ensuring that specialty providers, generally, and integrated urology practices, in particular, are able to participate meaningfully in the MIPS, APM incentive, and other programs under MACRA.		
Summary: LUGPA asked	I CMS to do the following:	
(1) Improve transpa	rency around the model approval process used by C	INIVII and ensure that
 (2) Clarify that an APM may define a specialty-focused benchmark for purposes of becoming an Advanced APM, rather than using total Medicare costs as the benchmark, and provide certain other clarifications of the Advanced APM rules; 		
(3) Use the CMMI waiver to ensure that participants in APMs that start after 2019 are not unduly discouraged from becoming Qualifying Participants;		
(4) Provide Clinical Practice Improvement Activities that are more meaningful to urologists and other independent specialty practices, and do not allow the "topped out" rules to penalize specialty practices:		
(5) Provide more in purposes of mea proposed prima	formation on how patients will be attributed to sing isuring resource use, and how patient relationship c ry care-focused, "two-step" attribution process;	le-specialty practices for odes will interact with the
(6) Withhold inclusi	on of Part D expenditures in the calculation of resou	irce use;
(7) Exercise caution	in using United States Preventive Services Task Ford	e (USPSTF)
recommendatio	ns in constructing quality measures for the MIPS; an	d
(8) Remove Agency self-referral ("St	 created barriers to provider alignment and collabor ark") law regulations. 	ation in the physician
Additional Notes/Comments		

Section 2. Relevant Literature

Relevant Literature Key words: Prostate Cancer; Payment Date BU international Risk Of Hospitalisation After Primary Treatment For Prostate Cancer 8/25/2016 Purpose/Abstract Objective: To compare the risk of hospitalisation and associated costs in patients after treatment for prostate cancer. Methods: The authors identified 29,571 patients aged 66-75 years without significant comorbidity from the Surveillance, Epidemiology, and End Results (SEER)-Medicare linked database who were diagnosed with localised prostate cancer between 2004 and 2009. The authors compared the rates of all-cause and treatment-related hospitalisation that occurred within 365 days of the initiation of definitive therapy and used multivariable logistic regression analysis to identify determinants associated with hospitalisation. Results: Meen who underwent radical prostatectomy (RP) rather than radiotherapy (RT) had lower odds of being hospitalised for any cause after therapy [odds ratio (OR) 0.80, 95% confidence interval (C): 0.74-0.87). Patients who underwent RP rather than RT had higher odds of being hospitalised for treatment-related complications (OR 1.15, 95% C1: 1.03-1.29). However, men who underwent external beam RT (EBRT)/intensity modulated RT (IMRT) (OR 0.84, 95% C1: 0.72-0.99) had 16% lower odds of hospitalisation from treatment-related complications than patients undergoing RP. Using propensity score-weighted analyses, there was no significant difference in the odds of hospitalisation from treatment-related complications for men who underwent RP vs RT (OR 1.06, 95% C1: 0.92-1.21). Patients hospitalisation from treatment-related complications after RT were costiler than patien			
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	Objective: To compare the prostate cancer. Methods: The authors ice from the Surveillance, Ept diagnosed with localised all-cause and treatment-definitive therapy and us associated with hospitalise Results: Men who underrodds of being hospitalise (CI): 0.74-0.87]. Patients treatment-related complexternal beam RT (EBRT), odds of hospitalisation fr propensity score-weighter from treatment-related for underwent RP (Mean \$18 Conclusions: With the exist significant difference in the spitalisation after treatare relevant in the context in the co	he risk of hospitalisation and associated costs in pat lentified 29,571 patients aged 66-75 years without s idemiology, and End Results (SEER)-Medicare linked prostate cancer between 2004 and 2009. The auth related hospitalisation that occurred within 365 day ed multivariable logistic regression analysis to ident sation. went radical prostatectomy (RP) rather than radioth d for any cause after therapy [odds ratio (OR) 0.80, who underwent RP rather than RT had higher odds ications (OR 1.15, 95% CI: 1.03-1.29). However, mer /intensity modulated RT (IMRT) (OR 0.84, 95% CI: 0. om treatment-related complications than patients ed analyses, there was no significant difference in the complications for men who underwent RP vs RT (OR treatment-related complications after RT were cost 3 381 vs \$13 203, P < 0.001). ception of men who underwent EBRT/IMRT, there we he odds of hospitalisation from treatment-related com- text of penalties linked to hospital readmissions and to Additional Notes/Comments	ients after treatment for significant comorbidity d database who were ors compared the rates of 's of the initiation of tify determinants herapy (RT) had lower 95% confidence interval of being hospitalised for n who underwent .72-0.99) had 16% lower undergoing RP. Using he odds of hospitalisation 1.06, 95% CI: 0.92-1.21). dier than patients who was no statistically complications. Costs from g RT than RP. Our findings bundled payment models.

Relevant Literature		
Key words: Prostate Cancer; Payment		
Journal	Title	Date
Medical Care	Understanding Regional Variation in Medicare Expenditures for Initial Episodes of Prostate Cancer Care	8/1/2014

Purpose/Abstract

Objectives: This study was conducted to evaluate the contributions of patient and treatment factors to overall expenditures and regional variation for initial treatment of localized prostate cancer (CaP) in the Medicare program.

Methods: Using the Surveillance, Epidemiology, and End Results (SEER)–Medicare database, the authors identified 47,517 beneficiaries with localized CaP during 2005–2009, and matched non-cancer controls. The authors employed hierarchical generalized linear models to estimate risk-standardized cancer-related expenditures for each hospital referral region. To identify key contributors to the variation, the authors sequentially added patient characteristics, treatment intensity (the percentage of patients receiving curative treatments), ancillary procedures (biopsy, hormone therapy, and imaging), and specific treatment modalities into the model. The authors categorized expenditures according to the type of services to identify their relative impact on the expenditure variations. **Results:** The mean expenditure on CaP-related care per CaP beneficiary was \$15,900, including \$1,800 on surgery, \$11,200 on radiotherapy, and \$1,900 on ancillary procedures. The expenditure difference between quintiles 5 and 1 was \$6,200. Patient characteristics explained 8.4% of this difference. Treatment intensity and treatment modalities accounted for an additional 21.2% and 31.2% of the variation, respectively. Between the highest and lowest expenditure quintiles, the difference in radiotherapy expenditure was \$5,000, whereas that in surgery or ancillary procedures was less than \$200.

Conclusions: There is substantial geographic variation in CaP expenditures, and the specific modality of radiotherapy is the most important contributor to this variation. Efforts to address the CaP care costs, such as bundled payment development, require targeting both treatment intensity and use of costly modalities.

Additional Notes/Comments

Section 3. Related Literature

Related Literature		
Key words: Prostate Biopsies; Surgical Pathology Services; Urologist Self-Referral		
Journal	Title	Date
Medicare & Medicaid	Linkages Between Utilization of Prostate Surgical	2012
Research Review	Pathology Services and Physician Self-Referral	2012
	Purpose/Abstract	
Objective: Federal law pr	ohibits a physician from referring Medicare patient	s for procedures or
services to health care er	ntities in which the physician has a financial relation	ship. This law has
exceptions which enable	physicians to self-refer under certain conditions. The	is study evaluates the
effects of self-referral on	use rates of surgical pathology services performed	in conjunction with
prostate biopsies and wh	ether such changes are linked to urologist self-refe	rral arrangements.
 prostate biopsies and whether such changes are linked to urologist self-referral arrangements. <i>Data and Sample:</i> A targeted market area case study design was employed to identify the sample from Medicare claims data. The sample included male beneficiaries who resided in geographically dispersed counties; were continuously enrolled in Medicare fee-for-service (FFS) during 2005-2007; and who met the criteria to be a potential candidate to undergo a prostate biopsy. <i>Outcomes:</i> Outcomes included prostate biopsy procedures per 1,000 male Medicare beneficiaries in each county; and counts of surgical pathology specimens (jars) associated with prostate biopsy procedures per 1,000 male Medicare beneficiaries in each county. <i>Findings:</i> Regression analysis shows that the self-referral percentage of total utilization was associated with significant increases in the use rate of prostate surgical pathology specimens (jars) are expected to be 41.5 units higher in a county where the self-referral share of total utilization was 50% compared to a county with no self-referral (share equals 0%). <i>Conclusions:</i> The findings show that urologist self-referral of prostate surgical pathology services results in increased utilization and higher Medicare spending. The results suggest that exceptions in federal and state self-referral prohibitions need to be re-evaluated. 		
	Additional Notes/Comments	

Section 4. References

- 1. Kirsh, G. M. (2016). The State of Independent Urology. *Reviews in Urology*, 18(1), 33-34.
- Mitchell, J. (2012). Linkages Between Utilization of Prostate Surgical Pathology Services and Physician Self-Referral. *Medicare & Medicaid Research Review*, 2(3). https://doi.org/10.5600/mmrr.002.03.A02
- 3. Wang, S.-Y., Wang, R., Yu, J. B., Ma, X., Xu, X., & Kim, S. P., et al. (2014). Understanding Regional Variation in Medicare Expenditures for Initial Episodes of Prostate Cancer Care: *Medical Care*, *52*(8), 680–687. https://doi.org/10.1097/MLR.00000000000158

Utilization of Active Surveillance in Low-Risk Prostate Cancer: A Brief Review of the Literature Prepared for the Large Urology Group Practice Association (LUGPA) Preliminary Review Team (PRT)

Purpose

The Large Urology Group Practice Association (LUGPA) has proposed a Physician-Focused Payment Model (PFPM) that promotes active surveillance (AS) over active intervention (AI) for "clinically appropriate patients with low-risk, localized prostate cancer." To assist in reviewing the LUGPA proposal, the Preliminary Review Team (PRT) requested that Social & Scientific Systems, Inc. (SSS) respond to the following:

The proposal assumes that there is a patient population [with prostate cancer] in AI who should not be. Would SSS review the literature to try to better understand the magnitude of this problem?

To address the PRT's request for information, SSS conducted a review of the literature to understand the following: (1) the prevalence of low-risk, localized prostate cancer (in the United States, in the Medicareeligible population), and (2) current treatment practices for low-risk, clinically localized prostate cancer, particularly the extent to which AS (and watchful waiting [WW]) is currently used when indicated versus more AI as the initial treatment strategy. The methods guiding this literature review can be found in Appendix A.

LUGPA addresses the potential overuse of AI by introducing a care management fee structure to surveil clinically appropriate patients with low-risk, clinically localized prostate cancer. The LUGPA Advanced Payment Model (APM) aims to promote appropriate utilization of AS and reduce utilization of AI by providing incentives for eligible professionals (EPs) to participate in patient-physician shared decision-making and to perform enhanced services needed to appropriately surveil beneficiaries.

Background

Over the past decade, the rates of both prostate cancer and low-risk prostate cancer have increased. Hayes et al. (2010), for example, estimated that of the 192,000 men diagnosed in 2009 with prostate cancer, approximately 70 percent had low-risk, clinically localized disease. There has also been growing support for the use of AS as the initial management strategy for patients with localized, low-risk prostate cancer. Annually, over 100,000 men diagnosed with prostate cancer in the United States are thought to be candidates for AS (Ganz et al., 2011). Yet, according to a National Institutes of Health (NIH) (2011) Consensus and State-of-the-Science Statement, only 10 percent of men with localized prostate cancer elected AS as a treatment strategy, but this estimate may not reflect current care practices or patient preferences.

Utilization of Active Surveillance in Low-Risk Prostate Cancer, October 2017

Treatment of Low-Risk Prostate Cancer

Three strategies are generally utilized in the management of patients with prostate cancer: (1) WW, (2) AI, and (3) AS. WW consists of observation with minimal monitoring (Bruinsma et al., 2017).¹ AI includes surgery, radiation therapy, or focal therapy treatment aimed to cure cancer. AS attempts to bridge the gap between AI and WW, and is intended to delay curative treatment for selected patients with ongoing surveillance until there is increased risk of disease (Tosoian et al., 2016).

AS vs. AI: Risks vs. Benefits

Recent guidelines from the American Urological Association (AUA), American Society for Radiation Oncology (ASTRO), and the Society of Urologic Oncology (SUO) outline several recommended approaches for men with low-risk prostate cancer: (1) Localized prostate cancer patients who are less than 65 years of age or are expected to live at least 10 years are more likely to experience cancer control benefits from prostatectomy than older men, and (2) Clinicians should recommend AS as the "preferable" care option for most low-risk, localized prostate cancer patients and as the "best available" care option for very low-risk, localized prostate cancer patients (Sanda et al., 2017). Elderly patients with low-risk cancer have a very small likelihood of dying from prostate cancer as the primary cause, and are therefore especially recommended to use AS (Jacobs et al., 2013; Lu-Yao et al., 2009). These elderly patients would comprise the vast majority of Medicare beneficiaries for whom LUGPA is interested in creating an APM. However, the treatment of elderly cancer patients in particular appears to frequently diverge from guidelines, suggesting a need to focus on appropriateness of care and use of AS in the elderly population (Fang et al., 2017).

AS is increasingly recommended as most prostate cancers have been found to be slow growing with very small or minimal increases in mortality rates among populations who receive AS versus AI (Ganz et al., 2011; Garisto & Klotz, 2017). In one study, there was only a 0.7 percent difference in overall survival rate between immediate surgery (AI) and AS for low-risk prostate cancer (Wilt et al., 2017). Even in the absence of treatment, low-risk prostate cancers tend to grow slowly (Klotz, 2010) and are not the primary cause of death for 50 percent to 60 percent of diagnosed patients (Lu-Yao et al., 2009). The length of time for subclinical cancer progression is thought to be at least 20 years followed by a clinical progression often lasting 15 years, suggesting that most patients have a "long window of curability" (Klotz, 2010).

In comparison, patients who receive AI are exposed to side effects or complications after treatment (Klotz, 2010). As such, management of low-risk patients with AS reduces the risk of over-treating

¹ In previous years, the term active surveillance (AS) was interchangeable with watchful waiting (WW), as both indicated no immediate curative treatment. However, in recent years, WW has been defined as observation with a lesser degree of monitoring compared with those enrolled in AS.

patients with clinically insignificant disease, while keeping the option of definitive therapy for patients who show signs of increased disease progression during surveillance (Klotz et al., 2015). In one study, for example, among 980 patients newly diagnosed with prostate cancer, approximately 40 percent were diagnosed as low-risk (Yamamoto et al. 2016) and were treated safely with AS, including 30 patients who developed disease progression via metastasis for which they were treated.² If initially treated with AI, however, patients with no signs of increased disease progression or associated clinical problems may, however, be unnecessarily exposed to the risk of significant side effects (Klotz, 2010). After receiving radical therapy (AI), for example, approximately 60 percent of patients experience consequent erectile dysfunction and 30 percent experience consequent symptoms of urinary incontinence (Barrett & Haider, 2017; Hugosson, Stranne, & Carlsson, 2011) and likely have a lower quality of life and functional ability. It is important to note, however, that information is limited on long-running cohorts to demonstrate the long-term safety of the different treatment approaches (Barrett & Haider, 2017; Godtman, Holmberg, Khatami, Pihl, Stranne, & Hugosson, 2016).

Han, Parihar, and Kim (2013) examined several institutional protocols focused on low-risk prostate cancer with AS and presented all results in a comparison table. The comparison table highlighted differences among institutional protocols with regard to the clinical criteria that were used to determine utilization of AS, the type and frequency of monitoring procedures that constitute AS, as well as the approach and criteria for identifying disease progression. Since eligibility criteria for AS enrollment differ by institution, there are no consistent criteria to take patients off AS or to prompt AI enrollment (Barrett & Haider, 2017; Babaian et al., 2015; Han, Parihar, & Kim, 2013). This may also contribute to the underutilization of AS and the overtreatment with AI.

Extent of AI Overuse and Possible Reasons

Despite the fact that AS is increasingly considered to be the best initial management strategy for men with low-risk prostate cancer, findings from several peer-reviewed studies (Godtman, 2016; Dall'Era, 2008, 2011; Shao, 2010; Miller, 2006; Barocas, 2008) demonstrate a strong and continued preference for AI. In an older study, Cooperberg, Broering, and Carroll (2010) found that only 810 men (6.8%) out of 11,892 men chose AS. The use of AS as the initial management strategy for low-risk prostate cancer exists but with large variation: Utilization of AS ranged from 9 percent to 75 percent of the observed patient population, with 16 percent to 60 percent of patients receiving AI initially.³ Although there are more recently established guidelines by AUA, ASTRO, and SUO (2017), differences may still exist with the criteria used to define low-risk population and could account for some of the wide variation in AS use. In a recent study using the National Cancer Database, among 448,000 patients who had low-risk prostate

² This study defined low-risk prostate cancer as those with a Gleason Score \leq 6 and a PSA \leq 10.

³ The percentages of AS utilization vary depending on the patient population observed by the studies conducted by Godtman, Holmberg, Khatami, Pihl, Stranne, & Hugosson, 2016; Dall'Era et al., 2011; Shao et al., 2010; Dall'Era et al., 2008; Miller et al., 2006; and Barocas, Cowan, Smith & Carroll, 2008. Some studies focused on only low-risk populations, whereas others included every risk category.

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cancer and 40,000 patients who met the criteria for AS, only 14 percent received AS and up to 52 percent of very low-risk patients still received radical prostatectomy (Parikh et al., 2017). There was, however, a secular trend of increasing use of AS from 11.6 percent in 2010 to 27.3 percent in 2013.

Another factor that may contribute to the underuse of AS is the psychological burden experienced by prostate cancer patients and their physicians. At the moment of treatment choice, the main reason for rejecting AS is fear of disease progression (Esserman, Shieh, & Thompson, 2009; Klotz, 2013). Patients often opt for treatment due to the psychological burden of living with cancer rather than the true risk of biological progression of the disease (Barrett & Haider, 2017). The prevalence of depression and anxiety in prostate cancer patients being managed with AS is estimated to be as high as 13 percent and 22 percent, respectively. Psychological distress is also a significant predictor of AS patients transferring to definitive treatment (Watts et al., 2014). Furthermore, surveillance fatigue may be experienced by AS patients due to the fear and uncertainty about their disease status, and desire to avoid repeated biopsies (Choyke & Loeb, 2017).

Several factors contribute to variation in shared decision-making between physicians and patients enrolled in AS. Loeb et al. (2016) reported eight factors: (1) Physician comfort with AS, (2) Protocol selection, (3) Beliefs about the utility and quality of testing, (4) Years of experience and exposure to AS during training, (5) Concerns about inflicting 'harm', (6) Patient characteristics, (7) Patient preferences, and (8) Financial incentives.

Conclusion

This review supports the contention that AS continues to be substantially underutilized in the management of patients with low-risk prostate cancer although overtreatment is likely to be decreasing over time. Factors contributing to this underutilization were found to include the variability in guidelines for AS enrollment and subsequent intervention, psychological distress among patients who are diagnosed with prostate cancer, the perception that AS is a "do nothing" approach to treatment of prostate cancer, and factors contributing to differences in physician decision-making and shared decision-making. Additionally, AS is especially underused for the elderly patient population due to the low risk of mortality due to prostate cancer relative to other causes. While LUGPA acknowledges an upward trend of interest in AS by both physicians and patients, the proposed APM addresses the ongoing need to promote AS to both eligible professionals and patients by remunerating providers for implementing AS via a management fee and performance-based payments. Thus, LUGPA suggests that Medicare spending will be reduced as quality of care is improved when patients shift from AI to AS enrollment within the proposed model.

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Appendix A. Methods

SSS performed a literature review to understand the evidence of enrollment rates of active surveillance (AS) and active intervention (AI). The literature search strategy included 28 peer-reviewed articles relevant to "low-risk, clinically localized prostate cancer" using PubMed and Google Scholar. Since the number of relevant literature dated within the five-year publication period was few, there are articles cited in this literature review that are dated beyond the five-year period. Publications included in this review are dated from 2002 to the present. The keywords utilized in this literature review are listed below and were used in combination or independently of each other:

- active intervention
- active surveillance
- anxiety
- criteria
- clinically localized
- curative treatment
- definitive therapy
- delayed intervention
- disease progression
- eligibility

- enrollment
- initial management
- immediate treatment
- incidence
- initial treatment
- long-term
- low-risk
- mortality rates
- newly diagnosed
- overtreatment

- percentage
- prostate cancer
- prostate-specific antigen
- quality of life
- side effects
- symptoms
- strategies
- therapy
- underutilization

All articles included in this literature review discuss prostate cancer and encompass all or some of the following components: the levels of risk stratification (i.e., very low, low, moderate, or high); localized or regional prostate cancer; and variability in characterizing low-risk prostate cancer.

PHYSICIAN-FOCUSED PAYMENT MODEL TECHNICAL ADVISORY COMMITTEE (PTAC)

PRELIMINARY REVIEW TEAM (PRT)

CONFERENCE CALL

LARGE UROLOGY GROUP PRACTICE ASSOCIATION (LUGPA) PRT CALL WITH UROLOGY EXPERT

Friday, October 20, 2017 3:30 p.m.

PRESENT:

PAUL CASALE, MD, MPH, PTAC Committee Member KAVITA PATEL, MD, PTAC Committee Member SARAH SELENICH, Office of the Assistant Secretary for Planning and Evaluation (ASPE) ADELE SHARTZER, PhD, Urban Institute

PHILLIP MUCKSAVAGE, MD, Perelman School of Medicine, University of Pennsylvania

ANJALI JAIN, MD, Social & Scientific Systems, Inc. (SSS)

	2
1	PROCEEDINGS
2	[3:35 p.m.]
3	DR. CASALE: So it's 3:35. We can get
4	started, and I'm sure Kavita will join in shortly.
5	So, before we get started, I know there
6	are a few other people on the phone. So, if you
7	want to just introduce yourselves, please?
8	DR. SHARTZER: Sure. This is Adele
9	Shartzer. I'm an Urban Institute employee helping
10	staff the ASPE (Office of the Assistant Secretary for
11	Planning and Evaluation) PTAC (Physician-Focused Payment
12	Model Technical Advisory Committee) process, and I'll
13	mainly be listening in.
14	We [unintelligible] your time, Dr.
15	Mucksavage.
16	DR. MUCKSAVAGE: Thanks.
17	DR. CASALE: Anyone else on the phone?
18	MS. TIMMONS: Hi, this is Vanessa Timmons
19	with SSS. I'm actually getting ready to jump off
20	the call. I just wanted to make sure that
21	everything got kicked off okay.
22	DR. CASALE: Okay.
23	Anyone else?
24	There's a transcriptionist on the phone.

1 Just so you know, the call will be transcribed. And Kavita just texted me. She's at an 2 airport, and she's being held up at security, so 3 we'll see if she -- hopefully, she'll get through 4 5 okay. So -- and just my background -- so I'm a б 7 cardiologist. I'm up in New York, in New York Presbyterian, and we have a preliminary review team 8 9 for each of the models, and so I am on this 10 particular preliminary review team, as is Dr. 11 Patel. 12 So, just to get started, before I ask 13 anything specific, I just wondered, do you have any 14 sort of just overall reactions once you read the --[unintelligible] related to sort of the clinical 15 16 model? 17 DR. MUCKSAVAGE: Yeah. 18 Can you just hold one second? I have to 19 do something clinically. One second. 20 DR. CASALE: Oh, sure. 21 DR. MUCKSAVAGE: I'm sorry. 22 DR. CASALE: That's okay. 23 [Pause.] 24 DR. MUCKSAVAGE: Sorry. I'm at the VA

(Veterans Administration). I'm covering a case,
 but it's okay.

3	DR. CASALE: Okay.
4	DR. MUCKSAVAGE: I mean, I think, you
5	know, I like the idea of the proposal in the sense
б	that it's trying to incentivize, you know,
7	practices to shift from active intervention for
8	prostate cancer to active surveillance. And, I
9	think, you know, in general, that seems to be the
10	trend. You know, I think more people are you
11	know, the public itself, as well as practitioners,
12	are kind of leaning that way, but this can kind of
13	be like a little bit of a nudge in order to help,
14	you know, some of the practices, you know, either
15	financially incentivize them to do it Because I
16	guess if you if you treat prostate cancer, you
17	know, obviously there's a financial incentive to
18	it, as the way to kind of, you know, get some
19	incentives to shift people more towards active
20	surveillance. Which, in a lot of cases, is probably
21	the right thing to do for, you know, a vast number
22	of patients that have low risk and sometimes even
23	low low-volume, intermediate-risk prostate
24	cancer, you can even consider active surveillance.

1 So, I mean, I think it's a good start in terms of, you know, again, making that shift, which 2 is happening already, but this is -- this may, you 3 know, just, you know, help with the -- help with 4 5 the push. DR. CASALE: Mm-hmm. So one of the б 7 questions was that the model -- the model begins with a biopsy. That sort of triggers --8 9 DR. MUCKSAVAGE: Yeah. 10 DR. CASALE: -- the model, and, you know, 11 one of the questions was, you know, was it -- does 12 it make sense to begin with the actual biopsy 13 result, or is it -- is there an opportunity to 14 begin this model sort of further upstream in terms of whether --15 DR. MUCKSAVAGE: I mean, I thought there -16 17 - one was with the PSA (prostate-specific antigen). 18 Can I --19 DR. CASALE: Yeah. 20 DR. MUCKSAVAGE: Can I put you on hold for 21 one second? I'll be -- I'll be right back. I'm 22 I've got to do two things at once, but I'll sorry. be right back. 23 24 DR. CASALE: Okay.

1 DR. MUCKSAVAGE: Sorry. 2 DR. CASALE: No problem. [Pause.] 3 DR. MUCKSAVAGE: Hello? 4 Sorry. We're 5 usually done by now, but there's a -- there was an add-on case, so -б 7 DR. CASALE: Okay. Sure. DR. MUCKSAVAGE: Sorry about that. 8 9 DR. CASALE: Yeah. 10 DR. MUCKSAVAGE: Yeah. So one of the 11 questions was, you know, whether this should start 12 with PSA screening. I think, you know, as an 13 urologist, most of the patients that we get with 14 PSA screening -- you know, I actually don't do a 15 lot of PSA screening. I see patients that have already been screened. So, I mean, this is a 16 urology, you know, initiative. 17 18 The majority of patients come in with a --19 an elevated PSA, and then we talk about, you know, 20 whether to do a biopsy. Considering should this 21 proposal start with the consideration of biopsy, I think that's a good question, you know, because --22 but that would add a lot of -- you know, a whole --23 24 you know, different factors involved in terms of,

1	you know, whether, you know, you should you
2	should biopsy this person versus not biopsy them.
3	There's other, you know, lab tests that they can do
4	or molecular tests in order to consider doing a
5	biopsy.
6	I mean, I kind of like the idea that it's
7	you know, it starts with the diagnosis of
8	prostate cancer, you know, because I think it makes
9	it just the proposal a little bit cleaner in
10	terms of, you know, managing the prostate cancer
11	patients.
12	DR. CASALE: Yeah.
13	DR. MUCKSAVAGE: Whereas, if you get into
14	the PSA biopsy, one, that's it's going to
15	increase the number of patients that, you know,
16	you're dealing with, and, you know, how do you
17	manage that? It's almost like two separate
18	problems. It would almost need like a separate,
19	you know
20	DR. CASALE: Yeah.
21	DR. MUCKSAVAGE: proposal, I think, in
22	order to do that, because I think it would just be
23	too complicated in that sense.
24	DR. CASALE: Okay. I appreciate that.

You know, one of the questions was, you 1 2 know, once you have the biopsy result and then you wanted the -- you wanted to get a sense of the 3 decision-making process --4 5 DR. MUCKSAVAGE: Yes. DR. CASALE: -- whether you go for active б 7 intervention versus active surveillance, and I know the proposers have sort of provided this modified 8 9 version of an NQS (National Quality Strategy) 10 measure, and I didn't know if you had any thoughts 11 around, you know, does that -- would that capture 12 adequately this shared decision-making process, or 13 is there something that might be better, just to be 14 sure -- you know, whenever you change a payment 15 model, you may change incentives that --16 DR. MUCKSAVAGE: Yeah. 17 DR. CASALE: -- which may have unintended consequences. It's just to be sure that there's 18 19 good shared decision-making, so --20 DR. MUCKSAVAGE: Yeah. What was -- I saw 21 it referenced, but I didn't see what the NQS model 22 was that they -- is it -- was it in the proposal? 23 DR. CASALE: It was -- yeah. 24 Adele, can you help me where the -- or

where it is that they referenced the
DR. SHARTZER: Yeah. I'll look it up
DR. CASALE: Okay.
DR. SHARTZER: and be back with you in
a minute.
DR. CASALE: Okay. That's fine.
So, anyway so it well, on another
area, do you think there are any potential
unintended consequences of being of this type of
model? Could it, you know, potentially lead to
increased number of biopsies because, all of a
sudden, there's a payment based on, you know, a
biopsy trigger for you know, just as an example?
As you think about this model, is there
DR. MUCKSAVAGE: Yeah.
DR. CASALE: some concerns around some
unintended consequences?
DR. MUCKSAVAGE: I think, you know, they
mention a few of them that you know, that
could patients have delays in care because of the
fear of, you know, taking people off active
surveillance? I mean, that's one potential, and,
you know, they mention that they would, you know,
screen for that.

1	Other the general kind of consensus
2	about active surveillances or active surveillance
3	of biopsies and everyone seems to there's
4	really no standard guidelines right now for, you
5	know, what what should be done for active
6	surveillance. Everyone has kind of a, you know,
7	what-they-do type of thing. You know, even some of
8	the criteria for patients that are eligible for
9	active surveillance, you know, differs.
10	The two main sites are from Hopkins and
11	from in Canada, in Toronto.
12	DR. CASALE: Mm-hmm.
13	DR. MUCKSAVAGE: The Hopkins has a very
14	strict criteria for active surveillance, which is
15	basically a biopsy. You know, after you've been
16	initiated into active surveillance, you know, a
17	
	biopsy yearly, PSAs every six months. Whereas the
18	biopsy yearly, PSAs every six months. Whereas the one in Toronto is a little bit less restrictive
18 19	biopsy yearly, PSAs every six months. Whereas the one in Toronto is a little bit less restrictive or a little bit less, you know, biopsy heavy in
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18 19 20 21 22	biopsy yearly, PSAs every six months. Whereas the one in Toronto is a little bit less restrictive or a little bit less, you know, biopsy heavy in terms of biopsy. They consider biopsies every one to two years, and I think most providers are doing biopsies every one to two years.
18 19 20 21 22 23	biopsy yearly, PSAs every six months. Whereas the one in Toronto is a little bit less restrictive or a little bit less, you know, biopsy heavy in terms of biopsy. They consider biopsies every one to two years, and I think most providers are doing biopsies every one to two years. So I don't think, you know, once you're on

1	is a potential problem if you're increasing the
2	number of biopsies, but, you know, I couldn't see
3	someone starting to do biopsies every six months
4	because they're in this protocol or on this on
5	this proposal here because I think that's just
6	overkill. And they can even screen for that, you
7	know, like they are for delaying treatment.
8	You know, so it's
9	DR. CASALE: I think sorry. I was
10	thinking more that people with a, you know, mildly
11	elevated PSA is there a possibility that people
12	might be encouraged to do biopsies? Because then,
13	all of a sudden, they're in this model because the
14	biopsy
15	DR. MUCKSAVAGE: Oh. You mean initially
16	getting into yeah.
17	DR. CASALE: Against yeah.
18	DR. MUCKSAVAGE: Yeah. I mean, that could
19	be that is a potential where you would see, you
20	know, patients with who don't fit the criteria
21	for a standard biopsy meeting do they have a 10-
22	year, you know, overall survival, you know, benefit
23	to getting treated for prostate cancer?
24	So, you know, you see like an 85-year-old

1 guy getting a biopsy. 2 DR. CASALE: Right. That is a potential. 3 DR. MUCKSAVAGE: I mean, that could be a potential where they 4 Yeah. 5 would, you know, try to find patients that otherwise, you know, you wouldn't biopsy or you б 7 would follow their PSA or even -- even not even consider biopsying. Could be -- you could over-8 9 utilize just to get them into it. 10 I mean -- I mean, there are methods to -to kind of screen for that. I mean, you know, 11 12 again, age, the age criteria kind of -- and some of 13 the guidelines just from AUA (American Urological Association) or NCCS (National Coalition for Cancer 14 Survivorship) or whatever for, you know, prostate, 15 for a prostate biopsy, which I don't think would be 16 17 too hard to screen for. 18 DR. CASALE: Yeah. This is Adele. 19 DR. SHARTZER: 20 I just wanted to follow up that the 21 patient provider measure is in Appendix 1 on page 22 22 of the proposal. It's a like four-item proposed 23 survey. 24 DR. CASALE: Oh, that was it. Right,

1 right.

2	This gets to the shared decision-making,
3	and it's four questions. You know, "Did your
4	health care provider talk to you about prostate
5	cancer treatment options?"
6	DR. MUCKSAVAGE: Oh, okay. That little
7	yeah. I think I kind of glazed over it.
8	DR. CASALE: Does that yeah. I just
9	didn't know if you had any reaction to that. Is
10	that a sufficient tool for being sure there's
11	shared decision-making?
12	DR. MUCKSAVAGE: Okay. Yeah, I am sorry I
13	glazed over that part. Here you go.
14	DR. CASALE: Kavita, did you join? I
15	heard a beep.
16	DR. PATEL: I just did. So hi.
17	DR. CASALE: Yeah.
18	DR. PATEL: Sorry, Dr. Mucksavage. I'm
19	I had the wrong call-in, so I apologize.
20	DR. MUCKSAVAGE: No problem.
21	DR. CASALE: Well, Kavita, I know you can
22	only stay on for a few minutes. We were just
23	talking I asked him about the shared decision-
24	making tool, if that was adequate given the

1	importance of that as we get towards the, you know,
2	surveillance versus intervention. And then we also
3	just talked about unintended consequences. You
4	know, could people be encouraged to do a biopsy for
5	an elevated PSA because you'll get them into the
6	model even though their risk of dying from, you
7	know
8	DR. MUCKSAVAGE: Other problems, yeah.
9	DR. CASALE: for their risk is pretty
10	low. So, anyway, those are the only things we
11	covered, so
12	DR. MUCKSAVAGE: Yeah. I mean, this
13	this question and it actually seems pretty
14	reasonable. I mean, it's I guess the patients
15	would get this after their visit and fill this out?
16	DR. CASALE: Yeah.
17	DR. MUCKSAVAGE: Yeah. I mean, you know,
18	whenever I talk to my patients about prostate
19	cancer, I mean, I'm assuming they would hit you
20	know, hit these as as all positives, meaning
21	that they would
22	DR. CASALE: Okay.
23	DR. MUCKSAVAGE: say that we had a talk
24	about every little, you know, possibility. So I

1 think -- I think this is reasonable, you know, and 2 it especially highlights the active surveillance 3 role. DR. CASALE: 4 Okay. 5 DR. MUCKSAVAGE: I mean, I think most providers talk about -- talk to patients about 6 7 that. I mean, it's --DR. CASALE: Uh-huh. 8 9 DR. MUCKSAVAGE: -- even patients, you 10 know, now -- it's been so kind of popularized in the press and lay press that, you know, patients 11 12 come in even -- you know, I even see patients with 13 high-risk cancer that, you know, "Can we watch And, you know, it's like, "No, not really." 14 this?" 15 DR. CASALE: Right. Kavita, again, I know you don't have much 16 17 time to be on the phone. Is there anything in 18 particular you wanted to clarify or ask? 19 DR. PATEL: Sure. 20 So maybe just a step back. Do you have a 21 sense -- so one of the things that we always 22 struggle with is like an alternative payment model 23 _ _ 24 Mm-hmm. DR. MUCKSAVAGE:

1 DR. PATEL: -- is a sense of like how --2 what like a rate of adoption could be, and I know we're not asking you to estimate, you know, what 3 proportion of the country do you think is 4 5 interested in this, but --DR. MUCKSAVAGE: Yes. б 7 DR. PATEL: -- in your -- since you're obviously an expert in the area, what is your sense 8 9 about kind of proportion of oncologists -- let me 10 rephrase this -- proportion of urologists as well 11 as maybe any other kind of oncology specialties, 12 sub-specialists who might be interested in 13 something like this. 14 And does it in your mind come into conflict? I had logged on, I had just dialed in 15 when you were talking about how, you know, without 16 17 this type of kind of rigorous -- I'll call it evidence-driven, like active surveillance --18 19 DR. MUCKSAVAGE: Yes. 20 DR. PATEL: -- that the real incentives 21 financially are to just re -- I mean, I see this at 22 Hopkins all the time. They just re-biopsy, redo, re this, re that. 23 24 DR. MUCKSAVAGE: Yeah.

DR. PATEL: And how -- so what is your sense about the populations who might be interested in this, and then in thinking about your peers, kind of where some of the resistance might be? Maybe that's not a fair question to ask, but I am just curious what your thoughts are.

7 DR. MUCKSAVAGE: I mean, I think --Yeah. I mean, this is the general trend. It's been going 8 9 on for the last five or so years, is that, you 10 know, more patients are going into active surveillance. More providers are putting people 11 12 into active surveillance. So I think this is 13 where, you know, the pendulum is kind of swinging, 14 you know, swinging back for prostate cancer in 15 terms of watching and not treating the low-risk prostate cancer. 16

So I think -- overall, I think there's a big interest in it, you know, and I think a lot of people would adopt it if it, you know, is -- you know, for this model, or they can be financially incentivized to adopt it.

22 So I think overall, I mean, most -- I 23 think most groups would be, you know, interested in 24 adopting this. I think it's a -- kind of a trend

1	that's just happening all over that's going to
2	continue to happen, and patients are actually
3	demanding it, as I was mentioning before, you know,
4	but there is you know, we talked about I did
5	mention Hopkins, that they seem to over-biopsy.
6	You know, they basically recommend biopsies
7	DR. PATEL: Yeah.
8	DR. MUCKSAVAGE: once a year.
9	DR. PATEL: Right.
10	DR. MUCKSAVAGE: But, you know, that I
11	mean, you know the kind of the protocols are
12	really, you know, biopsies one to one to two
13	years. So, I mean, I guess you could get into the
14	problem with groups over-biopsying because they're
15	into this program, but in general, I mean, you
16	know, the guidelines and there's no there are
17	no guidelines right now for, you know, active
18	surveillance. I mean, they have, you know, certain
19	like at Hopkins has a big one, and Toronto has a
20	big one. But, you know, I think it's probably
21	going to be going to the one- to two-year biopsies,
22	PSAs, you know, generally every six months.
23	So, you know, if they can if we if
24	there's a standardized protocol in terms of how to

1 follow the active surveillance, then I think, you
2 know, there's -- there'll be less chances for
3 abuse.

DR. PATEL: And is that the -- is that the issue that there is also -- Paul and I -- probably the three of us spend a lot of time at this intersection of like what -- what's really happening clinically and then what is nonsensical about our current payment system that makes doctors frustrated.

DR. MUCKSAVAGE: Yeah.

11

12 DR. PATEL: Is it more about -- can you 13 just tell us in your -- you're really our expert. 14 Can you tell us if some of the issues are really 15 around, you know, this is kind of becoming standard of care, most of us get it, but our payment model 16 just rewards the opposite type of care? Or is it 17 18 also that, you know, we have people with -- you 19 know, this concept of active surveillance is 20 something that we think everyone should have; 21 therefore, making it kind of a part of the payment 22 system will accelerate its adoption?

I guess -- and that -- I don't know if you
understand my distinction, but is this like, hey,

you know, people who do this are not being rewarded 1 right now -- in fact, you're penalized in a way --2 or is this --3 DR. MUCKSAVAGE: Yeah. 4 5 DR. PATEL: -- we want our profession to really make this part of -- I'll use the analogy in 6 7 internal medicine. Paul, you probably have one in cardiology. You know, we know vaccinations are 8 9 good. So, you know what? We're going to try to 10 pay people to like actually get vaccines and make 11 it easy --12 DR. MUCKSAVAGE: Yeah. 13 DR. PATEL: -- and, you know, is that --14 DR. MUCKSAVAGE: Yeah. DR. PATEL: Does that make sense? 15 DR. MUCKSAVAGE: You know, it's -- you 16 17 know, one, it's tough for me in an academic 18 setting. I'm -- you know, I'm not as incentivized 19 to -- I mean, I do have an incentive, but I'm not 20 as incentivized to kind of push people towards active treatment. So I think in some of the 21 academic settings, you know, patients, people 22 are -- are better at kind of adopting the active 23 24 surveillance.

But I think -- I mean, just, you know, in general, I think this is kind of -- it's moving that way where, you know, patients and -- you know, patients are demanding it, and doctors and urologists are just -- are doing it just because it makes sense that we should intrigue these low-risk prostate cancer patients.

So I'm not really sure how -- you know, 8 9 for me and my colleagues, you know, when I'm 10 counseling a patient about treatment options, I 11 mean, if you think about it, really an active 12 surveillance protocol, I think in the long term 13 with the number of biopsies that you may end up 14 doing if you're following patients for many years, you're actually going to be paid more, you know, if 15 you look -- not -- I mean, most of this protocol 16 17 looks at just one year, where they really talk 18 about the first year. But, I mean, most -- if 19 you're on active surveillance, 20 to 30 percent of 20 people will fall off of active surveillance, either 21 because you find more cancer or they decide they 22 don't want to watch it anymore. They're worried. 23 So you're really -- you know, it's really you're 24 getting a couple more biopsies out of this, and

1	then you may be getting, you know you know,
2	incentivized for treatment down the line.
3	So there's always it's always like
4	there's like a carrot at the end of the at this
5	you know, there's a it's a carrot with the
6	end of the stick there that, hey, this guy doesn't
7	want to have treatment right now, but in a few
8	years, he may need treatment. And too, even if he
9	doesn't get treatment, you know, the question is,
10	How long do we follow people on active
11	surveillance? No one knows that.
12	I mean, right now, it's you have to keep
13	following them because you don't know how much they
14	die from something else, but you don't know, you
15	know, what the outcome is. I just one of the
16	Hopkins guys was at a conference this morning, and
17	he said really they're just starting to look at
18	their data now that it's becoming more mature.
19	It's that, you know, after four or five years, it's
20	almost like you can almost stop active
21	surveillance. That those people that those low-
22	risk cancers probably aren't going to do any
23	nothing is going to happen to them, so
24	I don't know if that answers your

1 question.

2	DR. PATEL: No, that's helpful. Thank
3	you. I know it's a hard question to answer.
4	DR. MUCKSAVAGE: Yeah. And it's hard for
5	you know, I'm not it's I'm in a different
6	you know, I'm not incentivized to push people
7	towards treatment. I mean, I I'm I have that
8	ability to talk to people and, you know, put them
9	on active surveillance if I think it's right or
10	and I don't feel the financial pressure not to put
11	them on active surveillance, you know, in the long
12	run, where some of the someone in a private
13	practice group may.
14	DR. CASALE: So, I mean, that's an
15	interesting that whole and I think they
16	brought it up even in their model because part of
17	the description of, you know, why have a new model
18	was while they get, you know, sort of you get
19	paid to do the intervention, and you need to be
20	encouraged not to do the intervention.
21	And your other comment about being in an
22	academic medical center and I spoke informally
23	to the urologist here who had the same I think
24	the same sentiment that you were expressing that

1 and correct me if I'm wrong -- that the urologists 2 at the academic medical center, in general, the percent that are in active surveillance is much 3 higher --4 5 DR. MUCKSAVAGE: Yeah. DR. CASALE: -- than in the community б 7 urology practices. DR. MUCKSAVAGE: Yeah. And I think this 8 9 is a good -- the proposal is a good idea if you try 10 to push more patients in the community towards 11 active surveillance. I think, you know, so it is 12 kind of a double-edged sword. But, you know -- but 13 I agree we definitely -- you know, in academics, we 14 have more leeway in terms of getting, you know -not having to worry about the financial incentives 15 of treating patients. 16 17 So -- but, yeah, in general, I think it's -- you know, it's like 40 percent or higher. 18 Ι 19 can't remember the exact numbers, but -- of 20 patients, you know -- you know, on active surveillance in academic centers versus like that 21 22 20 percent that they're quoting, 26 percent or so in their proposal. So it is much -- it is higher 23 in academic centers. 24

DR. CASALE: So one of their part of the 1 2 payment is this monthly care management fee, which they say -- you know, which they say is required to 3 appropriately do surveillance? 4 5 DR. MUCKSAVAGE: Yeah. DR. CASALE: And again, any -- I just -б 7 either a comment on whether that fee seems adequate or how that --8 9 DR. MUCKSAVAGE: I mean, so most 10 surveillance patients are -- you know, you see them 11 every six months. It's a six-month visit. They're 12 often fairly quick visits. It's a PSA check, a --13 you know, an office visit, and then, you know --14 you know, a digital rectal exam to ensure nothing is really changing, and then to go ahead with the 15 decision to do another biopsy versus -- or even an 16 17 MRI(magnetic resonance imaging), you know, the 18 prostate. 19 So, you know, I'm not sure why they need a 20 monthly -- I mean, you still -- they still get the 21 office visit, right, reimbursed? Is that how that 22 works? Again, I don't -- I don't understand how 23 these incentive payments and things like that work, 24 but I think that's just a way to, you know,

1 incentivize people to get them on that active 2 surveillance, you know. DR. CASALE: Yep. Again, I don't know. 3 You would -- you know, in terms of is there a -- do 4 5 you need to hire people to like call these patients to be sure they come in and that kind of thing? б Ι 7 guess I was thinking part of this care management 8 fee was to have the --9 DR. MUCKSAVAGE: Wants to do that to make 10 sure they --11 DR. CASALE: Yeah. 12 DR. MUCKSAVAGE: I mean, most --13 DR. CASALE: You're --14 DR. MUCKSAVAGE: Yeah. I mean, there's 15 always a loss of -- loss of follow-up, but I think most patients with, you know, the prostate cancer 16 17 diagnosis are fairly --18 DR. CASALE: Yeah. 19 DR. MUCKSAVAGE: -- they're fairly good at 20 coming back --21 DR. CASALE: Right. DR. MUCKSAVAGE: -- you know, for their 22 23 PSA checks and things like that --24 DR. CASALE: Yeah.

1 DR. MUCKSAVAGE: -- you know, when you 2 give them a cancer diagnoses. So, I -- you know, I'm not -- I'm not 3 quite sure where that -- you know, that extra money 4 5 comes into and what they actually would need, you know --6 7 DR. CASALE: Yeah. DR. MUCKSAVAGE: -- versus, you know, like 8 9 a guy who you are following for routine elevated 10 PSA that, you know, had a negative biopsy. I mean, 11 you essentially get PSAs every six to 12 months and 12 see them back then. 13 DR. CASALE: Yeah. Okay. 14 So just turning to another topic -- and 15 again, this is related to the payment part, but on page 18 of their proposal, when they talk about 16 17 integration and care coordination, they say that 18 the urologist basically, or the entity, would be at risk for beneficiary's total cost of care for 12 19 20 months. 21 So the question then, at least in my 22 experience, urologists have not been -- I don't think felt that they were the ones to be 23 24 responsible for total cost of care. They talk

about collaborating with their primary care 1 2 physicians, but I just wondered your reaction to the idea on the payment side that the urologist 3 would be sort of at risk for total cost of care. 4 5 DR. MUCKSAVAGE: Yeah. You know, I saw that question, and I didn't quite understand what б that meant because, you know, they mentioned, you 7 know, the stop gap, the 20 percent plus or minus or 8 9 125 percent. I was hoping you can elaborate --10 DR. CASALE: But even putting that side, I 11 guess just clinically --12 DR. MUCKSAVAGE: Mm-hmm. 13 DR. CASALE: Again, in my -- I mean, my --14 you know, the idea that the urologist would sort of 15 be directing the -- assuming risk for total cost of care meaning -- and part of that is collaborating 16 17 with primary care, but presumably would have a very 18 active participation in care --19 DR. MUCKSAVAGE: Yeah. 20 DR. CASALE: -- potentially not related to 21 the prostate cancer in order to be sure that -- you 22 know, since they're the one sort of at risk for the -- for the cost. 23 24 DR. MUCKSAVAGE: So the -- I mean, you

1	know, for these patients that are on active
2	surveillance, it's you know, it's even if you
3	six months, even if they have you know, so
4	you missed high-risk cancer on a biopsy.
5	Generally, six months to a year wouldn't change
6	anything. So, you know, per year, I think that's
7	why they assume that I think the assuming
8	total costs overall would be very low, and I think
9	that's what most of the groups would think when
10	they saw that.
11	So, I think yeah. I mean, I again,
12	I'm not sure what exactly that means. I mean, do
13	they have to pay if something goes wrong? Even if
14	they get if they have a heart attack, they get
15	issued they have they get penalized
16	DR. CASALE: Well
17	DR. MUCKSAVAGE: or is it just prostate
18	cancer
19	DR. CASALE: Yeah.
20	DR. MUCKSAVAGE: related?
21	DR. CASALE: No. It just says total cost
22	of care. That would be you know, so if you have
23	a Medicare patient with six comorbid conditions,
24	including cardiac disease and they end up with a

heart attack, that would be part of their total
 cost of care.

3	DR. MUCKSAVAGE: Yeah. That's a little
4	unusual, I think, you know. I would I thought
5	they were assuming, you know, total cost of like
6	prostate cancer care, but yeah. I mean, I don't
7	see you know, as a urologist, especially in a
8	busy private practice group, you know, really
9	assessing I mean, most of the patients you put
10	on active surveillance, you know, even if or
11	you're not treating their prostate cancer and
12	you're assuming, you know, they put them on the
13	active surveillance, I mean, some of them are
14	patients that don't have, you know, good
15	comorbidities or we assume won't be alive in 10
16	years so that's why you don't treat them. You
17	know, so that's a little bit unusual in terms of
18	them assuming all the costs of care.
19	That's why I didn't quite understand. I
20	think that's why I didn't understand the question,
21	is because, yeah, I don't see why urologists would
22	want to assume, you know, total cost of care.
23	DR. CASALE: Right, right.

Kavita, are you still on? I just got --

24

1	DR. PATEL: I am.
2	DR. CASALE: Oh, okay.
3	DR. PATEL: I am.
4	DR. CASALE: Fine.
5	DR. PATEL: No, I'm curious, actually if
6	there's a even in your own practice kind of, you
7	mentioned that like active surveillance and then
8	even patients, obviously, are kind of in the shared
9	decision-making space, kind of demanding to have
10	these conversations.
11	DR. MUCKSAVAGE: Yeah.
12	DR. PATEL: Do you have a gut sense about
13	and this is totally asking for you to kind of
14	think about anecdote. Do you think in retrospect
15	or reflection that these visits where you're having
16	these conversations, et cetera, and think about
17	time kind of pre-active surveillance
18	DR. MUCKSAVAGE: Yeah.
19	DR. PATEL: What's the time commitment
20	on your part? How much more time on your part as a
21	physician does this take?
22	DR. MUCKSAVAGE: You know, I think it
23	you know, it does it does take more time because
24	you're kind of throwing a lot of stuff at a

1 patient, you know. One, you know, if the patient 2 isn't well educated on active -- on prostate cancer 3 that, you know, they hear the "cancer" word and, 4 you know, they think they need to be treated, and 5 it's almost like talking them out of treatment.

So it does require a little bit more time б rather than just saying, "Yeah, you need your 7 prostate taken out." Or, "You need to be radiated." 8 9 So, it would probably add, you know, five or ten 10 more minutes, you know, to an office visit to explain, "Hey, this is a low-risk cancer. 11 You 12 know, we don't need to treat this. You know, so 13 you can avoid some of the risks of treatment." So, 14 there is -- there is a cost -- I mean, there is a 15 time sync involved in that.

And then there's also a time sync in terms 16 17 of patients on active surveillance when, you know, 18 they really should come off active surveillances. 19 You know, this is -- you're -- or a patient who's -20 - you know, wants active surveillance and is not an 21 appropriate candidate for active surveillance. There is a little bit of a time sync in terms of 22 talking to patients about that and getting them to 23 24 decide for treatment or to come off treatment.

1	So, you know, I I've been practicing
2	mainly with the active in the active
3	surveillance era, so I think maybe I'm a little bit
4	more used to it, but I think, you know, I can
5	definitely see, you know, before where, you know,
6	you have low-risk prostate cancer, you need surgery
7	or radiation, you know, talk to the radiation
8	oncologist if you want radiation versus now it's
9	you're adding in this kind of "We're not treating
10	your cancer. There's a low risk it's going to
11	spread." So, yeah, it definitely does add time to
12	to what you're doing.
13	DR. CASALE: On the on page 19 Do
14	you have the proposal there in front of you by any
15	chance?
16	DR. MUCKSAVAGE: Yeah.
17	DR. CASALE: Okay. Great.
18	On page 19, it's about patient safety, you
19	know, with and, you know, ensuring, you know,
20	sort of patients aren't harmed, and so a couple of
21	things. One is they said they proposed a measure
22	a quality measure related to time on active
23	surveillance, and I wondered what you thought of
24	that as a quality measure.

1 And then further down, they talk about proposing a monitoring strategy that would allow 2 CMS (Centers for Medicaid & Medicaid Services) to create 3 corrective actions and possible financial penalties 4 5 for patients that delay necessary treatment to reduce expenditures. б 7 DR. MUCKSAVAGE: Yeah. DR. CASALE: I mean, is that even possible 8 9 to -- I mean, how would you, you know, figure that out? 10 So, I guess I'm looking for your reaction to 11 those things. One is a time [unintelligible] --12 DR. MUCKSAVAGE: Yeah. That was -- I 13 thought I brought that up earlier that I thought 14 that was kind of interesting, you know, one of the abuses that could be, is a patient who should come 15 off active surveillance, but they keep them on it 16 17 just so they can hit their targets. 18 DR. CASALE: Okay. 19 DR. MUCKSAVAGE: You know, I think -- you 20 know, if you have -- if you have access to the PSA 21 data, I mean, it would require, you know, kind of 22 sifting through that, the PSA data and the biopsy 23 data, you know, and making sure that patients are

24 getting biopsies or have PSAs that haven't changed,

1 or MRIs that are okay. That would be the only way to really see if there is, you know -- if they are 2 delaying to keep them on the protocol. 3 You know, time on active surveillance, 4 5 that's -- you know, again, you know, most people when they go on active surveillance, I mean, I б think the first year -- you know, most people are 7 on it for a year. If -- you know, as I was saying, 8 9 if you're not off of it by year three or four, you 10 know, you're probably not going to come off of it. 11 DR. CASALE: Yeah. 12 DR. MUCKSAVAGE: So there is a -- and 13 there's about a 20 or 30 percent dropout, meaning 14 people getting treated at that point. So, I mean, I think, you know, this is 15 great if you look at after four years, but the 16 17 first few years, I think, you know, there is a --18 there is a one-in-five chance you're going to need 19 to get treatment. And that's just, you know, from 20 disease progression or you find higher-risk 21 disease, you know, on follow-up biopsy. 22 So, I think I'm not sure how, you know -you know, time on active surveillance is -- you 23 24 know, that -- I mean, I think that it's good for

1	the patients that need it, but there are patients
2	that, you know, should be treated. I'm not sure
3	how much of a performance I think if you if
4	you kind of if you build a performance model
5	where the patients are getting, you know, a
6	prostate biopsy, that, you know, they maintain
7	their their Gleason score and or their PSA
8	hasn't changed, that might be a different
9	different way to measure performance.
10	DR. CASALE: Yeah.
11	And then sorry. And I'm also still
12	back on page 6
13	DR. MUCKSAVAGE: Mm-hmm.
14	DR. CASALE: where they talk about the
15	major barriers, you know, to changing physician
16	or practice patterns?
17	DR. MUCKSAVAGE: Yeah.
18	DR. CASALE: You know, the first line says
19	it's to "assure that physicians are financially
20	viable." So, does it make sense to I mean, so,
21	is that really I guess I'm looking for your
22	reaction. Is that justification for this type of
23	model? And it says "truly those
24	DR. MUCKSAVAGE: Yeah. I mean, I

1 DR. CASALE: -- particularly those 2 practices with integrated ancillary services," 3 so --DR. MUCKSAVAGE: Yeah. 4 5 DR. CASALE: I don't know. I'm just -- I guess I'm looking for exact -б 7 DR. MUCKSAVAGE: Well, I guess what they mean is the integrated -- the ancillary service of 8 9 a radiation center, I think, and I think a lot 10 of --11 DR. CASALE: Yeah. 12 DR. MUCKSAVAGE: You know, that's kind of 13 been cracked down on. So most urology practices 14 aren't -- don't have integrated -- I'm sorry --15 radiation centers anymore. 16 But, you know, in terms of active 17 surveillance, my kind of qut feeling about it is in 18 the long term, if people are on it long enough, you know, it actually costs -- probably costs more --19 DR. CASALE: Yeah. 20 21 DR. MUCKSAVAGE: -- over many, many years 22 rather than getting treated. You know, after you get your -- your radical prostatectomy, I mean, 23 24 it's basically a PSA test, you know, every three to

<pre>1 six months, you know, for a couple years and then, 2 you know, yearly. Versus this is PSAs, prostate 3 biopsies, MRIs, you know. In the broader picture, 4 you know, for the health care system, it's actually 5 you actually probably spend more money. 6 Does the doctor make more? I mean, I'm 7 not sure how many biopsies you need to do to get 8 paid for a 9 DR. CASALE: Yeah. 10 DR. MUCKSAVAGE: you know, a radical 11 prostatectomy, but, you know, over a few years, it 12 may add up. It's probably still a little bit less 13 but definitely with radiation, I mean, I think if 14 they have an integrated radiation center, they will 15 lose money over time. I mean, I think that's what 16 their point is there. It's really to compensate 17 the groups that own radiation centers that 18 potentially will lose money by not giving 19 radiation. 20 DR. CASALE: Right. But I'm trying to 21 understand why that would be a reason to have a new 22 payment model. 23 DR. MUCKSAVAGE: Yes. I think 24 DR. CASALE: You want to do what's right</pre>		
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DR. CASALE: You want to do what's right	23	DR. MUCKSAVAGE: Yes. I think
	24	DR. CASALE: You want to do what's right

for the patient, right? And so what you're 1 2 saying --DR. MUCKSAVAGE: 3 Yes. DR. CASALE: -- is that one active 4 5 intervention versus active surveillance, it may not be necessarily one that's, you know, in the long б 7 run has lower cost than the other. You're just trying to do what's best for the patient. 8 9 But in this particular situation where the 10 urology practice has ancillary services, that in particular, you know, would favor one over the 11 other in terms of intervention versus surveillance. 12 13 Do I understand --14 DR. MUCKSAVAGE: Yeah. 15 DR. CASALE: Is that -- is that - so, you think part of what's driving the higher rate of 16 17 active intervention in the community versus the 18 academic center is this -- and I don't want to put 19 -- is that it, the ownership of ancillary services? 20 DR. MUCKSAVAGE: Yeah, it is. I mean, 21 it's potentially the ownership of the radiation 22 centers --23 DR. CASALE: Yeah. Right. 24 DR. MUCKSAVAGE: -- which, I think is

1 going away, but, you know, what -- you know, and 2 the data shows that once a urology group buys a radiation center --3 DR. CASALE: Uh-huh. 4 5 DR. MUCKSAVAGE: -- the number of radical prostatectomies goes down significantly, almost 6 7 like, you know, zero. DR. CASALE: Right. 8 9 DR. MUCKSAVAGE: Basically, everyone gets 10 shuttled into radiation. So I think it's more for, you know, to compensate for loss of revenue from a 11 12 radiation center. 13 DR. CASALE: Mm-hmm. Yeah. Okay. That's 14 helpful. 15 Kavita, are you still on? I know you said you had to drop off. I don't know if you've 16 17 dropped off yet. 18 [No response.] DR. CASALE: Yeah, I think she did. 19 Ι 20 think she had to get on a flight. 21 Well, I don't have any other questions. 22 Sarah, I don't know -- or, Adele, do you 23 have any questions? 24 DR. SHARTZER: I don't, Paul.

1	MS. SELENICH: None from me.
2	DR. CASALE: Okay.
3	Well, thank you very much for being on the
4	call. This has been very helpful for me, and I
5	know it's been challenging being doing clinical
6	work and being on the call, so we appreciate you
7	DR. MUCKSAVAGE: Yeah, I know. It's the
8	VA, you know. I'm just supervising, but yeah, if
9	you have if there's any other questions, I mean,
10	I you know, I think this is a little bit
11	complicated for me. I mean, I don't know any of
12	these targeted, these, you know, performance
13	things. You know, I'll be honest, I don't I
14	don't follow a lot of this stuff, but I hope I
15	provided some clinical background for you.
16	DR. CASALE: Yeah, yeah. It was very
17	helpful. Yeah. That was great.
18	Thank you so much, and have a good
19	weekend.
20	DR. MUCKSAVAGE: Okay.
21	DR. CASALE: Thanks.
22	DR. MUCKSAVAGE: All right. Thank you.
23	All right.
24	DR. CASALE: Bye now.

I

1	DR. MUCKSAVAGE: Okay. Bye.
2	DR. SHARTZER: Thanks.
3	[Whereupon, at 4:18 p.m., the conference
4	call concluded.]
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