

306 – ALTERNATIVE PAYMENT MODEL INITIATIVE – WITHHOLD AND QUALITY MEASURE PERFORMANCE INCENTIVE

EFFECTIVE DATE: 10/01/22, 10/01/23

APPROVAL DATE: 10/06/22, 01/22/24

I. PURPOSE

This Policy applies to ACC, ACC-RBHA (limited to the Contractor’s ACC population only), and ALTCS E/PD Contractors. It is AHCCCS’ intent that this Policy will also apply to integrated ACC-RBHA members with a Serious Mental Illness (SMI) designation in CYE 2025. The purpose of the AHCCCS Alternative Payment Model (APM) Initiative – Withhold and Quality Measure Performance (QMP) Incentive is to encourage Contractor activity in the area of quality improvement, particularly those initiatives that are conducive to improved health outcomes and cost savings, by aligning the incentives of the Contractor and provider through APM strategies.

II. DEFINITIONS

For Purposes of this Policy, the following terms are defined as:

COMBINED PERFORMANCE SCORE (CPS)	The computation that adds the Performance Achievement Score and Performance Improvement Score is used to determine the Contractor’s Earned CPS payment, not to exceed one point.
EARNED PAYMENT	Amounts returned to the Contractor, by Performance Measure (PM), based on the results of the Earned CPS payment and QMP Incentive payment.
EARNED COMBINED PERFORMANCE SCORE PAYMENT	The amount returned to the Contractor, by Performance Measure (PM), based on the results of the Combined Performance Score (CPS), is not to exceed 100% of each Contractor’s Withhold. This was previously referred to as the Earned Withhold.
HIGH-PERFORMANCE AND THRESHOLD BENCHMARKS	The performance standards established by AHCCCS, for each Performance Measure (PM) based on consideration of National Committee for Quality Assurance (NCQA) Medicaid percentile data and historical Contractor performance, used in calculating the Performance Achievement Score.
IMPROVEMENT BENCHMARK	A performance standard which requires the Contractor to demonstrate statistically significant improvement from baseline performance (which is typically the Contractor’s previous year’s performance unless otherwise specified by AHCCCS) for measures, where applicable and appropriate. Statistically significant improvement is defined using a Pearson Chi-Squared Test.

MEASUREMENT YEAR (MY)	January 1 through December 31.
PEARSON CHI-SQUARED TEST	A hypothesis test designed to determine a statistically significant relationship between variables (i.e., utilized to determine if two variables are statistically independent).
PERFORMANCE ACHIEVEMENT SCORE	This score measures the Contractor’s performance relative to the Threshold Benchmark and High-Performance Benchmark established by AHCCCS prior to the start of the MY.
PERFORMANCE IMPROVEMENT SCORE	This score measures whether the Contractor demonstrated statistically significant improvement for measures where applicable and appropriate, as identified by AHCCCS.
PERFORMANCE MEASURES (PM)	Health care quality measures utilized by the AHCCCS Quality Improvement Team. Subsets of these measures were selected for use in this Policy. The Performance Measures (PMs) shall be calculated on a calendar year basis by the Contractor and validated by the AHCCCS External Quality Review Organization (EQRO).
PROSPECTIVE GROSS CAPITATION	<p>ACC and ACC-RBHA: Prospective Title XIX/XXI capitation payments, excluding payments for integrated ACC-RBHA members with a Serious Mental Illness (SMI) designation and payments for the first 24 hours of a crisis, made to the Contractor on a monthly basis which includes medical expense, risk adjustment, reinsurance offset, administration, risk/contingency, and premium tax, and any subsequent amendments thereof. For purposes of this Policy, Prospective Gross Capitation is exclusive of Delivery Supplemental, any directed payments specified in 42 CFR 438.6(c) paid on a quarterly or annual lump sum basis, and State Only Transplant payments.</p> <p>ALTCS E/PD: Prospective capitation payments made to the Contractor on a monthly basis which includes medical expense, reinsurance offset, the share of cost offset, administration, case management, risk/contingency and premium tax, and any subsequent amendments thereof. For purposes of this Policy, Prospective Gross Capitation is exclusive of any directed payments as specified in 42 CFR 438.6(c) paid on a quarterly or annual lump sum basis.</p>

**QUALITY MEASURE
PERFORMANCE
INCENTIVE (QMP
INCENTIVE)
PAYMENT**

Additional incentives earned beyond the Earned Combined Performance Score (CPS) payment, by Performance Measure (PM), based on the Contractor’s performance relative to other Contractors, weighted to reflect the size of the Contractor’s contribution to the measure-specific Withhold. The Incentive payment cannot exceed 5% of each Contractor’s annual capitation. Only Contractors that have demonstrated achievement or improvement via the Combined Performance Score are eligible to earn a Quality Measure Performance (QMP) Incentive payment.

**QUALITY MEASURE
PERFORMANCE
(QMP) INCENTIVE
POOL**

The fund source for the Quality Measure Performance (QMP) Incentive payment, is calculated as the difference between the total measure-specific Withhold amount across Contractors and the total measure-specific Earned Combined Performance Score (CPS) Payment across Contractors.

**QUALITY MEASURE
PERFORMANCE
(QMP) INCENTIVE
WEIGHT**

The value used to ensure a Contractor’s Quality Measure Performance (QMP) Incentive payment compares to the Contractor’s performance relative to the performance of other Contractors and is weighted to reflect the size of the Contractor’s contribution to the measure-specific Withhold.

WITHHOLD

A specified percentage of all Contractors’ Prospective Gross Capitation payments that shall be withheld via a recoupment after the completion of the contract year.

III. POLICY

A. GENERAL

The Contractor is eligible to qualify for an Earned Combined Performance Score (CPS) payment and QMP Incentive payment.

The Earned CPS payment and QMP Incentive payment shall be made to the Contractor based on relative Contractor performance on the subset of Performance Measures (PMs) selected for the Measurement Year (MY) that are calculated by the Contractor and validated by the AHCCCS External Quality Review Organization (EQRO). ACC/ACC-RBHA performance measure rates are to be limited to the Contractor’s ACC population only. Each Performance Measure (PM) is allocated a percentage of the total Withhold funds available for disbursement and each PM shall be considered independently of other PMs, such that a Contractor can obtain an Earned CPS payment and QMP Incentive payment on any or all the PMs. The PM information can be found in the ACOM 306 benchmarks document on the AHCCCS website under AHCCCS Info - Initiatives - Payment Modernization - Value Based Purchasing.

The CPS, which is a maximum of one point per measure, used to determine the Earned CPS payment is based on two factors: the Contractor's Performance Achievement Score and Performance Improvement Score, as specified in Attachment A. The Performance Achievement Score assesses the Contractor's performance relative to two benchmarks, a Threshold Benchmark and a High-Performance Benchmark, for each PM. Performance below the Threshold Benchmark equals zero points. Performance at or above the Threshold Benchmark but below the High-Performance Benchmark equals half a point. Performance at or above the High-Performance Benchmark equals one point. The Contractor's final performance measure rate (inclusive of all decimal places) shall be utilized when comparing the Contractor's performance to the associated benchmark (i.e., rounding will not be applied to the Contractor performance measure rates).

AHCCCS will establish one Threshold Benchmark and one High-Performance Benchmark for each measure. The benchmarks for each measure will vary based on Contractor's performance relative to national Medicaid managed care percentiles, as outlined in the ACOM 306 benchmarks document available on the AHCCCS website under AHCCCS Info – Initiatives – Payment Modernization – Value Based Purchasing. Benchmarks will be based on the most recent available data at the time of establishing the benchmarks so that all benchmarks are known prior to the start of the MY. For example, AHCCCS may use National Committee for Quality Assurance (NCQA) data for calendar year 2022, released in October 2023, to set Threshold and High-Performance Benchmarks for assessing Contractor performance for MY 2024 in late fall or early winter of 2023. AHCCCS anticipates identifying the PMs at least two months in advance of the MY. AHCCCS will strive to establish the general guidelines used to inform the establishment of the Threshold and High-Performance Benchmarks as well as the Threshold and High-Performance Benchmarks for each measure in advance of the MY pending the timing of when NCQA releases annual reports on Medicaid managed care performance data. Once the Threshold Benchmarks and High-Performance Benchmarks have been determined, they can be found in the ACOM Policy 306 benchmarks document on the AHCCCS website under AHCCCS Info - Initiatives - Payment Modernization - Value Based Purchasing.

The Performance Improvement Score assesses whether a Contractor demonstrated statistically significant improvement, defined using a Pearson Chi-Squared Test and a p value result of <0.05 for measures where applicable and appropriate (i.e., not applicable for measures in which statistical testing is not recommended such as the Plan All-Cause Readmissions (PCR): Observed versus Expected (O/E) Ratio), over baseline performance, which is typically the Contractor's previous year's performance unless otherwise specified by AHCCCS. Contractors who do not achieve the High-Performance Benchmark may earn up to half a point through the Performance Improvement Score if their Performance Achievement Score is either zero or half a point. Contractors who demonstrate statistically significant improvement earn half a point.

Contractors who do not meet either the Threshold Benchmark or the Improvement Benchmark (for applicable measures and as outlined in this Policy) are ineligible to receive an Earned Combined Performance Score Payment for the applicable measure for the applicable year.

The following table outlines the potential points earned for meeting or exceeding the Threshold Benchmark, Improvement Benchmark, and/or High-Performance Benchmark.

BENCHMARK (MEETING/EXCEEDING)	POINTS EARNED
Threshold Benchmark	0.5
Improvement Benchmark ¹	0.5
High Performance Benchmark	1.0
Threshold Benchmark & Improvement Benchmark ¹	1.0
Threshold Benchmark & High-Performance Benchmark	1.0
High Performance Benchmark & Improvement Benchmark ¹	1.0

¹ Defined as statistically significant improvement as outlined in this Policy and does not apply to measures in which statistical testing is not recommended (e.g., Plan All-Cause Readmissions: Observed versus Expected (O/E) Ratio).

Note: The total points earned cannot exceed 1.0. If no benchmarks are achieved, the Contractor earns zero points.

Any Contractor that has demonstrated achievement or improvement by meeting the Threshold Benchmark, High-Performance Benchmark, and/or Improvement Benchmark can earn additional incentives by measure through the QMP Incentive, so long as there are unearned withhold funds available for redistribution and the total incentive earned across measures, when combined with the ACOM Policy 307 Performance Based Payment Incentive, does not exceed 5% of the Contractor’s annual capitation. The QMP Incentive Pool is calculated on a measure-specific basis and is equal to the total measure-specific Withhold amount across Contractors minus the total measure-specific Earned CPS payment across Contractors. The QMP Incentive payment is based on the Contractor’s performance relative to other Contractors, weighted to reflect the size of the Contractor’s contribution to the measure-specific Withhold.

Modifications to the CPS, its components, and additional methods for determining the Earned CPS payment and QMP Incentive payment, including computations based on improvement in PMs from year-to-year, may be employed in future MYs.

AHCCCS reserves the right to eliminate a particular PM for use in this Policy, such as in instances where measures are retired, measure-specifications are substantially changed, data limitations are noted, or based on other factors as determined by AHCCCS. AHCCCS will select primary and secondary PMs for each line of business. The secondary PMs will be used to replace primary PMs if for any reason a primary PM cannot be calculated for the MY. AHCCCS will select which secondary PMs will replace the primary PMs in these instances and will notify the Contractors once this determination is finalized. If all secondary PMs are exhausted or AHCCCS determines that a primary PM should not be replaced by a secondary PM, in such a case, AHCCCS will remove and return each Contractor's Withhold amount for that PM.

AHCCCS reserves the right to exclude a particular Contractor from one or more PMs used in this Policy based on insufficient population (as defined within the general reporting guidance found within the associated measurement year technical specifications) or other reasons determined by AHCCCS. In such a case, AHCCCS reserves the right to remove and return the Contractor's Withhold amount for that PM.

In instances where a Contractor has one or more nonreportable PMs, AHCCCS will exclude the Contractor's applicable PMs from the calculation, but the Contractor's applicable Withhold amounts will not be returned to the Contractor. A nonreportable PM results when a Contractor is unable to meet the validation requirements for a PM and the PM is assessed by the EQRO as a 'Do Not Report' rate instead of a reportable rate.

As the Contractor's EQRO-validated performance measure rates are used as the basis for comparison and performance evaluation, any deviation from AHCCCS guidance related to using administrative methodologies to calculate a hybrid-based measure may have a negative impact as it pertains to the Contractor's ability to achieve points under the Performance Achievement Score for the current MY.

In instances where a Contractor utilized one methodology in the previous year to calculate a PM and calculated the PM utilizing a different methodology in the subsequent year (i.e., administrative methodology in one year to hybrid methodology the next or hybrid methodology in one year to administrative methodology the next), the Contractor will be excluded from earning points under the Performance Improvement Score, but the Contractor's applicable Withhold amounts will not be returned to the Contractor.

AHCCCS reserves the right to eliminate all PMs used in this Policy should Federal funding not be available for payment or for other reasons determined by AHCCCS. In such a case, AHCCCS will remove and return each Contractor's Withhold amounts. For circumstances in which the Contractor's Performance Achievement Score and/or Performance Improvement Score and/or data are impacted by external factors that result in invalid data and/or outcomes that are not representative of actual Contractor performance, as determined by AHCCCS, AHCCCS may implement alternatives to the current PM withhold/incentive calculation. For example, during a Public Health Emergency (PHE), the Contractor's performance on specific PMs may be negatively impacted by external factors. As another example, there may be Centers for Medicare & Medicaid Services (CMS) or NCQA-driven changes to PMs. In such circumstances and other similar circumstances, AHCCCS may consider implementing an alternative Withhold/Quality Measure Performance (QMP) Incentive calculation/methodology that accounts for such factors in a manner that allows a more appropriate measure of Contractor performance. For example, AHCCCS may consider suspending PMs, transitioning to secondary PMs, substituting prior year performance if available, measuring performance for a portion of the year, removing the Performance Achievement Score or Performance Improvement Score, and/or designating an alternative performance measurement methodology. If an alternative methodology is selected, AHCCCS intends to implement it in a manner that is consistent with the intent of the original PM to the extent feasible.

The Withhold is equal to one percent of Prospective Gross Capitation for the contract year end associated with the MY.

The technical methods of performance measure calculation and analysis are summarized in the External Quality Review (EQR) Annual Report that includes Contractor performance measure rates for the associated MY.

Risk adjustment methods for the PMs shall be considered and utilized, if deemed appropriate.

AHCCCS will review the PMs on an annual basis and may add to, modify, or replace the PMs to align AHCCCS PMs across the various AHCCCS programs, to emphasize initiatives of importance to AHCCCS, or to align with the best interest of the AHCCCS Program and/or the State.

B. AHCCCS RESPONSIBILITIES FOR CALCULATING WITHHOLD AND QUALITY MEASURE PERFORMANCE INCENTIVE PAYMENTS

1. After the completion of the contract year, AHCCCS will recoup the full amount of the Withhold from each Contractor.

Following AHCCCS' EQRO validation of the Contractor's PM rates, AHCCCS will tabulate the CPS for each PM by Contractor.

The Withhold amount may be adjusted, if necessary, for the elimination of a particular PM or the elimination of a Contractor from a particular PM as indicated above.

The full amount of the Withhold will be distributed among Contractors based on performance on the PM, unless otherwise noted in this Policy.

The CPS by PM will be calculated as shown below (refer to Attachment A for an example).

W = Contractor's measure-specific Withhold amount

CMeasure = Contractor's PM Result

TBM = Threshold Benchmark

HPBM = High-Performance Benchmark

Performance Achievement Score:

If CMeasure is equal to or above HPBM, then one point

If CMeasure is equal to or above TBM but below HPBM, then half a point

If CMeasure is below TBM, then zero points

Performance Improvement Score:

If statistically significant improvement (a p value of <0.05), as defined above, then half a point, unless the Contractor earned one point from the Performance Achievement Score for meeting or exceeding the HPBM. In such a case, no additional Performance Improvement Score is earned.

If there is no statistically significant improvement, then zero points.

Combined Performance Score:

Performance Achievement Score + Performance Improvement Score

2. Calculation of the Earned CPS payment: The Earned CPS payment will be calculated by multiplying the CPS by Contractor by PM and the Withhold by Contractor by PM. The Contractor may earn an amount less than or equal to the Contractor's Withhold by PM, but the Contractor shall not earn greater than the Contractor's Withhold by PM in accordance with Federal regulation.

3. The QMP Incentive Pool for each PM will be calculated by subtracting the total Earned CPS payments across Contractors from the total Withhold amount across Contractors.
4. Calculation of the QMP Incentive payment: The QMP Incentive will be calculated by comparing the Contractor's performance relative to other Contractors by PM, weighted to reflect the size of the Contractor's contribution to the measure-specific Withhold. The QMP Incentive payment will be calculated as shown below (refer to Attachment A for an example).

W = Contractor's measure-specific Withhold amount

CMeasure = Contractor's PM Result

$$QMP\ Incentive\ Weight = (CMeasure / \text{Sum of all Contractor PM Results}) \times (W / \text{Sum of all Withholds for PM across Contractors})$$

$$QMP\ Incentive\ Payment = (QMP\ Incentive\ Pool / \text{Total QMP Incentive Weights}) \times \text{Contractor's QMP Incentive Weight}$$

5. Due to Federal requirements at 42 CFR 438.6(b)(2), the maximum incentive payments made to any Contractor by line of business will be limited to 5% of capitation funding (refer to Attachment B for examples). AHCCCS will assess the total amount of QMP Incentive payments across all PMs due to the Contractor. Any QMP Incentive payment amount in excess of the Federal limit, when combined with ACOM Policy 307 Performance Based Payment Incentive, shall be reduced to bring the total incentive payments to a Contractor within Federal requirements.
6. The results computed, in this section, for the Earned CPS payment and QMP Incentive payment will be adjusted as an addition or subtraction for premium tax, depending on whether the result computed is a payment or a recoupment (refer to Attachment B for an example).

AHCCCS will provide the Contractor with the components used for the Earned CPS payment and QMP Incentive payment calculations and written notice of the deadline for review and comment by the Contractor. Upon completion of the review period, AHCCCS will evaluate the Contractor's comments and address any issues as warranted.

Any amount due to the Contractor will be paid through a lump sum payment. Any amount due from the Contractor will be recouped through a future monthly capitation payment.