

# Illinois Department of Healthcare and Family Services

## Hospital Rate Reform Initiative

### Technical Advisory Group

January 29, 2013



# Meeting Agenda



## Agenda

Revised Inpatient Model with Policy Adjusters

Shadow Pricing Models

TAG Requested Analyses

Alternative Inpatient Model Update

Coding Improvement / Transition Period

Questions and Discussion

# Revised Inpatient Model with Policy Adjusters





## Revised Model assumptions

- » Effective July 1, 2013, HFS will replace its current Medicaid FFS inpatient CMS DRG version 12 and per diem payment methodology with a new APR-DRG-based payment system
  - › At implementation, the new APR-DRG system will not replace static payments, MPA/MHVA payments or LTAC add-on payments
  
- » Based on review of the “Baseline” model and input from the TAG, HFS is evaluating a revised model with:
  - › Policy adjusters that increase payments for key Medicaid services
  - › “Flat” per diem rate for specialty services (psychiatric, rehabilitation and LTAC services) that removes the acuity and graduated day adjustments from the pricing formula



## Revised Model assumptions (continued)

- » Revised model uses SFY 2009 claim-based payments net of DSH, MPA/MHVA, and LTAC add-on payments as basis for APR-DRG system funding pool
  - › Used SFY 2009 data to facilitate data reconciliation with IHA
  - › Claim reported payments used for DRG funding pool do not reflect SMART Act reductions
  - › LTAC per diem payments under current system simulated for a provider paid under DRGs in SFY 2009
  - › Static payments excluded from DRG funding pool
  
- » Modeled rates are designed to make each category of service budget neutral to current system claim DRG / per diem payments
  - › COS 20 – Acute
  - › COS 21 – Psychiatric
  - › COS 22 – Rehabilitation
  - › COS 20 – LTAC

# Revised Inpatient Model With Policy Adjusters



## Acute services

- » For COS 20 acute services, revised model components include:
  - › APR-DRG version 29 3M national relative weights re-center scaled to 1.0 for Illinois Medicaid case mix
  - › Statewide standardized base rate of \$4,193.48, with labor portion adjusted for FFY 2012 Medicare IPPS wage index
  - › Medicare outlier policy, with \$22,385 fixed stop loss, and 80% marginal cost percentage
  - › Medicare standard transfer-out policy (without post-acute transfer policy) – prorated payment for cases with length of stay less than APR-DRG average
  - › No direct or indirect medical education payments

# Revised Inpatient Model With Policy Adjusters



## Acute services

- » Baseline model (without policy adjusters) projected a \$35.7 million decrease in payments (6.6% reduction) for newborn and obstetrical services combined
  - › HFS and the TAG recognize that newborn and obstetrical services are critical to the Medicaid program and have a high Medicaid market share
  - › TAG requested that HFS evaluate a policy adjuster for these services
  
- » To maintain access to these services, HFS, with support of the TAG, is considering a policy adjuster that would maintain current system funding levels for newborn and obstetrical services combined



## Acute services (continued)

- » Policy adjuster of 15% applied to DRG base payments for newborn/OB services as follows:
  - › Normal newborn DRGs: identified based on APR-DRGs 626 and 640
  - › Neonate DRGs: identified based on non-normal newborn DRGs in MDC 15 (Newborns and other neonates with condition originating in perinatal period)
  - › Obstetric DRGs: identified based on MDC 14 (Pregnancy, childbirth and the puerperium)
  
- » Acute pediatric services were also evaluated, but because these services already had a projected payment increase, no policy adjuster was applied in the model



## Psychiatric services

- » For COS 21 psychiatric services, revised model components include:
  - › Psychiatric-specific standardized per diem rate of \$366.45, adjusted for FFY 2012 Medicare IPF-PPS wage index and rural status
  - › Removed relative weight and graduated day adjustments
  
- » Baseline model (without policy adjusters) projected a \$19.6 million decrease in payments (23.0% reduction) for pediatric psychiatric services
  - › Policy adjuster of 30% applied to per diem payments for psychiatric pediatric services to maintain current funding levels



## Rehabilitation services

- » For COS 22 rehabilitation services, revised model components include:
  - › Rehabilitation-specific standardized per diem rate of \$597.93, adjusted for FFY 2012 Medicare IRF-PPS wage index and rural status
  - › Removed relative weight adjustments
  
- » Baseline model (without policy adjusters) projected a \$1.3 million decrease in payments (20.3% reduction) for pediatric psychiatric services
  - › Policy adjuster of 30% applied to per diem payments for rehabilitation pediatric services to maintain current funding levels

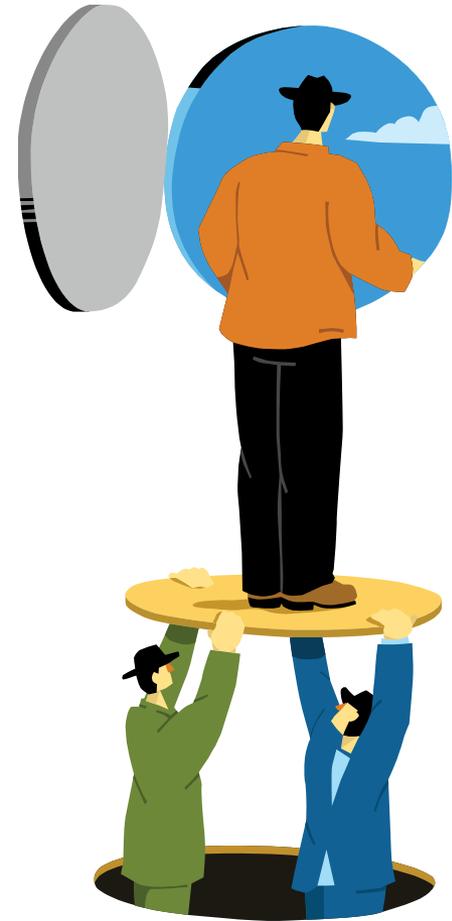
# Revised Inpatient Model With Policy Adjusters



## LTAC services

- » For COS 20 LTAC services, revised model components include:
  - › LTAC-specific standardized per diem rate of \$593.79, adjusted for FFY 2012 Medicare IPPS wage index
  - › Removed relative weight adjustments
  
- » Since virtually all LTAC claims were adult, no pediatric policy adjuster was applied in the model

# Shadow Pricing Models





## Shadow Pricing Assumptions – Partial SFY 2013 Claim Data

- » To evaluate the new system using the most recent claims data available (and as required by the SMART Act), HFS has re-priced 92,093 SFY 2013 FFS claims under the Revised Model payment rates and methodology
  - › Claims with an admission dates starting July 1, 2012 and discharges dates on or before December 14, 2012
  
- » SFY 2013 claim reported payments reflect 3.5% SMART Act reductions
  - › For comparison purposes, 3.5% SMART Act reductions applied to simulated new system payments
  - › Simulated new system payments were compared to reported claim payments net of DSH, MPA/MHVA and LTAC add-ons



## Shadow Pricing Assumptions – Full SFY 2011 Claims Data

- » To evaluate the new system using the most fully mature and complete state fiscal year of claims data available, HFS has re-priced SFY 2011 FFS claims under the Revised Model payment rates and methodology
  
- » SMART Act reductions had not yet occurred in SFY 2011
  - › As such, for comparison purposes, 3.5% SMART Act reductions were not applied to simulated new system payments
  - › Simulated new system payments were compared to reported claim payments net of DSH, MPA/MHVA and LTAC add-ons

# Shadow Pricing Models

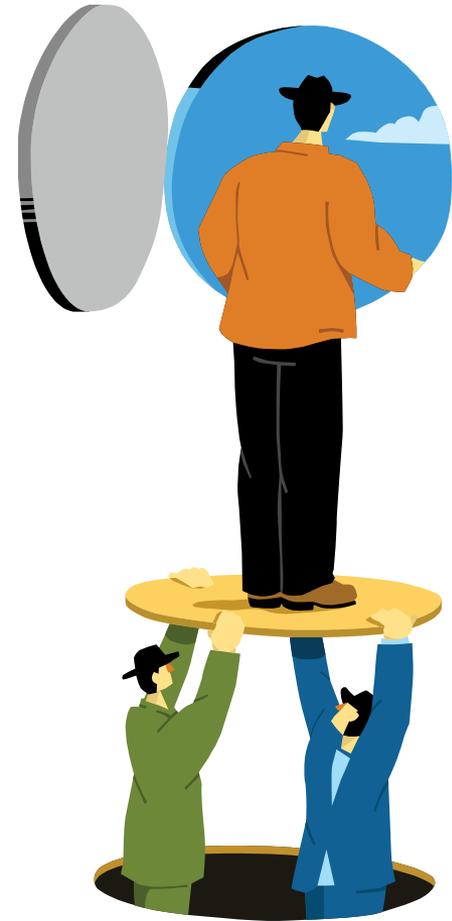


## Shadow Pricing Assumptions – SFY 2011 Claims (Continued)

- » Revised Model rates applied to SFY 2011 FFS claims data resulted in simulated new system payments that are lower than current system payments:

Category of Service	SFY 2011 Claims Data Reported Payments			Revised Model Rates Applied to SFY 2011 Claims Data			Estimated Payment Change
	DRG/Per Diem Payments	Outlier Payments	Total Claim Payments (Net of DSH/MPA)	DRG/Per Diem Payments	Outlier Payments	Total Claim Payments (Net of DSH/MPA)	
Acute COS 20 Services	\$1,261.2	\$610.4	\$1,871.6	\$1,543.2	\$249.1	\$1,792.2	-\$79.4
Psychiatric COS 21 Services	\$160.9	\$0.0	\$160.9	\$153.4	\$0.0	\$153.4	-\$7.5
Rehabilitation COS 22 Services	\$31.2	\$0.1	\$31.3	\$30.7	\$0.0	\$30.7	-\$0.6
LTAC COS 20 Services	\$46.1	\$6.5	\$52.5	\$37.3	\$0.0	\$37.3	-\$15.2
<b>Inpatient Total</b>	<b>\$1,499.3</b>	<b>\$617.0</b>	<b>\$2,116.3</b>	<b>\$1,764.5</b>	<b>\$249.1</b>	<b>\$2,013.6</b>	<b>-\$102.7</b>

# Requested TAG Analyses





## Requested analyses from prior TAG meeting

- » Consider model version that maintains current system outlier payment levels
- » Evaluate model results for transplant services
- » Evaluate model results for teaching hospitals
- » Evaluate model results for providers with high capital expenditures
- » Consider cost-based LTAC payment rates

# Requested TAG Analyses



## “Current Outlier Level” Approach

- » Alternative model requested to maintain outlier payments at current levels for acute services (\$471.4 million for SFY 2009 acute COS 20 claims):

Alternative Model Version	Outlier Payments (Using SFY 2009 Claims)	Outlier Payment % of Total DRG Payments	Modeled Outlier Fixed Loss Threshold	Modeled Outlier Marginal Cost Factor	Percent of Acute COS 20 Claims with Simulated Outlier Payment
Current System	\$471.4 million	27.2%	\$28,981 (SFY 2009 average)	0.80	5.7%
Revised Model with Policy Adjusters	\$251.4 million	14.5%	\$22,385	0.80	2.3%
Alternative Baseline Model 1	\$471.4 million	27.2%	\$6,475	0.80	10.9%
Alternative Baseline Model 2	\$471.4 million	27.2%	\$8,537	0.90	8.0%
Alternative Baseline Model 3	\$471.4 million	27.2%	\$22,385	1.457	2.4%



## Transplant Service Evaluation

- » Current inpatient methodology pays 60% of charges for transplants (except for kidneys, which are paid under DRGs)
- » Policy Adjuster Model using SFY 2009 data simulates a per discharge DRG payment plus outlier for transfer cases
  - › 27.1% modeled pay-to-charge ratio for transplants (using inflated charges) under new system compared to 21.8% for acute services overall



## Medical Education Evaluation

- » Current inpatient methodology does not include separate claim-based direct or indirect medical education payments; IME factor used to reduce outlier payments when calculating claim costs
  
- » In the Revised Model (using SFY 2009 data), the 10 in-state general acute teaching hospitals with the highest FFY 2013 Medicare intern-to-bed ratio have a projected a \$26.0 million combined payment increase (6.5% change) for acute services
  - › 8 hospitals with a projected gain, 2 with a projected loss
  
- » In the Revised Model (using SFY 2009 data), the 10 in-state general teaching hospitals with the highest Medicaid direct medical education costs (based on SFY 2009 claims) have a projected \$23.3 million combined payment increase (3.9% change) for acute services
  - › 6 hospitals with a projected gain, 4 with a projected loss



## Capital Cost Evaluation

- » Current inpatient methodology includes a capital per discharge add-on payment (not acuity or length of stay adjusted)
- » In the Revised Model (using SFY 2009 data), the 10 in-state general acute hospitals with the highest Medicaid capital costs (based on SFY 2009 claims) have a projected \$28.4 million combined payment increase (4.8% change) for acute services
  - › 6 hospitals with a projected gain, 4 with a projected loss



## LTAC Cost-Based Rate Evaluation

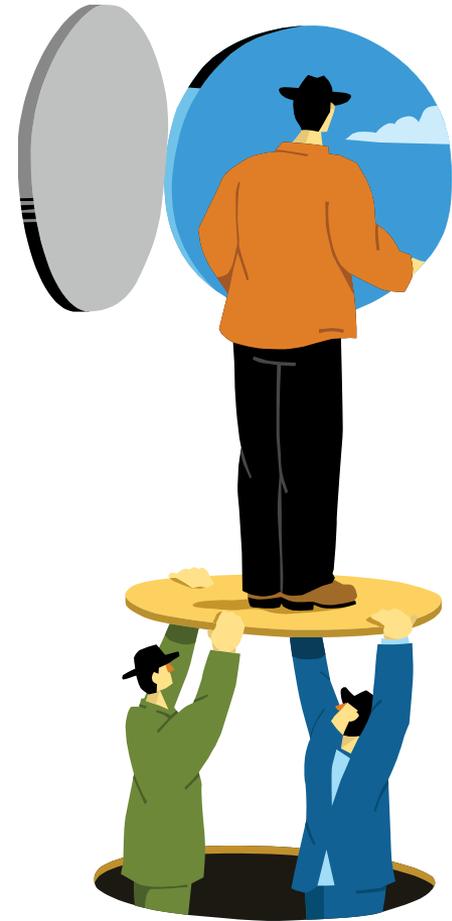
- » LTAC provider cost per day distribution using SFY 2009 claims data (current LTAC per diem rate is \$604):

LTAC Provider	LTAC Provider Estimated SFY 2013 Cost Per Day (Without Assessment Cost)
1	\$ 1,215.06
2	\$ 1,314.28
3	\$ 1,405.08
4	\$ 1,698.18
5	\$ 2,034.24
6	\$ 2,162.64
Weighted Average	\$1,309.28

# Alternative Inpatient Model Update



# Transitional Corridor





## Example Transitional Corridor Period

- » Payments are made through DRG methodology
- » Transition is created through adjustment to hospital base rates
- » Prospectively limit individual hospital's estimated payment change percentage to:
  - › +/- 5% in year 1
  - › +/- 10% in year 2
  - › +/- 15% in year 3
  - › Rebase using claims paid under APR-DRGs and coded under ICD-10 in year 4
- » Will allow hospitals time to adjust, improve efficiency, and reduce cost growth
- » Actual transition period may differ from example

# Questions and Discussion

