

CLL in Rural America:

A Cancer Care Performance and Quality Improvement Initiative for Clinicians in Rural Practice



CLL in Rural America: A Cancer Care Performance and Quality Improvement Initiative for Clinicians in Rural Practice

Provided by



Supported by educational grants from AbbVie, Genentech, and Pharmacyclics.

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Rural Cancer Care Nationally and Locally

Alan Morgan, MPA
Chief Executive Officer
National Rural Health Association
Washington, DC

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The State of Rural America

- Workforce shortages
- Vulnerable populations
- Chronic poverty



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Workforce Shortages

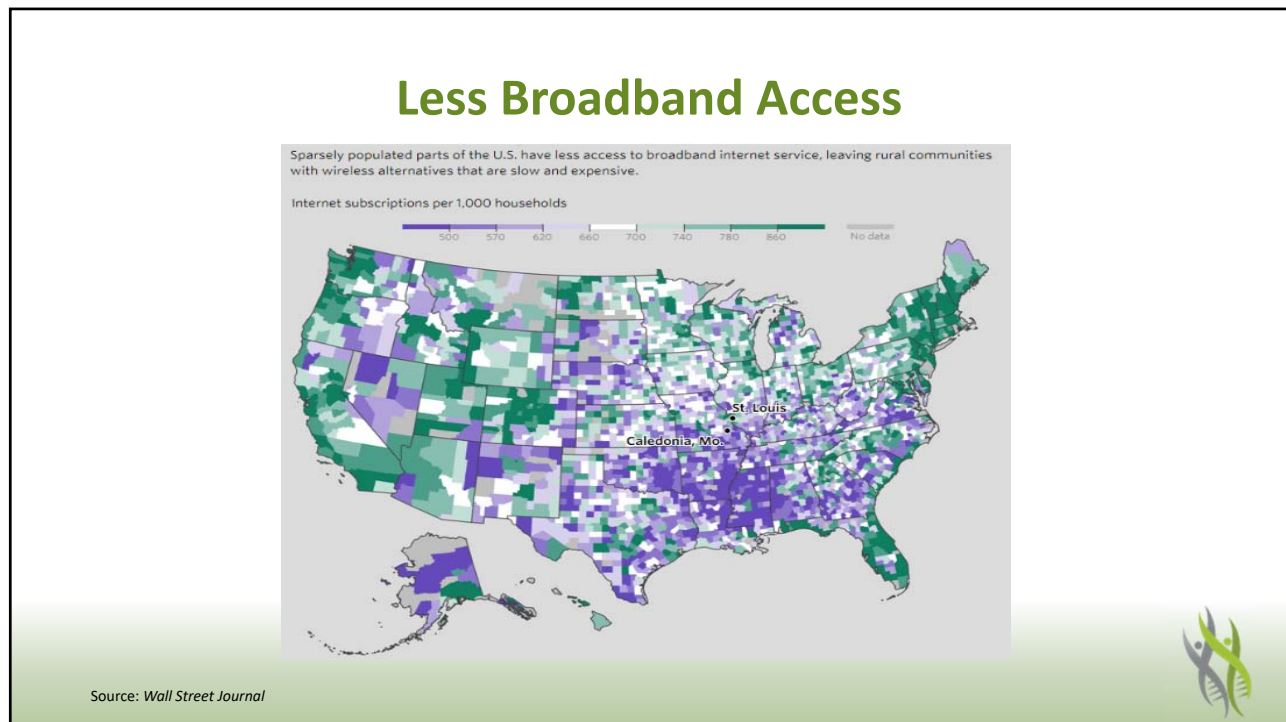
- Only 9% of physicians practice in rural America
- 77% of the 2,050 rural counties are primary care Health Professional Shortage Areas (HPSAs)
- More than 50% of rural patients have to drive 60+ miles to receive specialty care



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The Pre-COVID Rural Hospital Environment

- In February 1, 2020:
 - 2000 rural hospitals (1300 Critical Access Hospitals, 700 Prospective Payment System Facilities)
 - 47% operating at a loss
 - Half of all rural hospitals had 30 days cash on hand
 - More than 400 at risk for closure

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“Coronavirus strains cash-strapped hospitals, could cause up to 100 to close within a year”

Josh Salman and
Jayme Fraser
USA TODAY NETWORK



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However, Rural Excellence Exists



“I wish more people recognized and appreciated the level of quality that can be delivered in a rural setting. I still believe that most people don’t recognize that the national data shows that rural hospitals and rural clinicians have better quality care – sometimes equal – but generally better-quality care. You know your patients!”

— Alan Morgan, CEO of the National Rural Health Association

ALAMOSA NEWS

Rio Grande Hospital recognized among top 20 critical access hospitals in the nation



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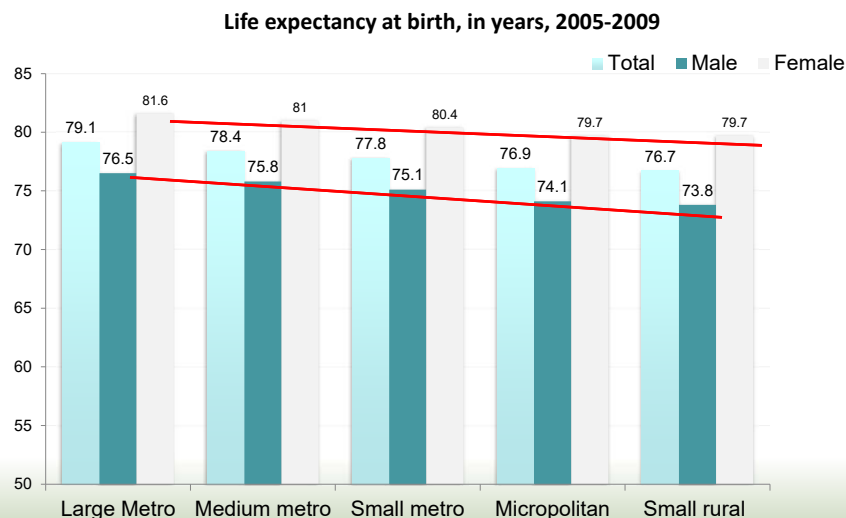
Rural as an Older, Sicker and Poorer Population

- The median age of adults living in rural areas is greater than those living in urban
 - Rural: 51 years
 - Urban: 45 Years
- 18.4% of rural residents are age 65+, whereas its 14.5% in urban
- Rural areas have higher rates of several health risk factors/conditions
 - Obesity
 - Diabetes
 - Smoking



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Life Expectancy Declines with Rurality



Singh GK, Siahpush M. *J Urban Health*. 2014;91(2):272-292.



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Rural Cancer Mortality Rates A Rural Divide in American Death: CDC 2017

- Rates of cancer are higher among rural Americans
- Minorities, especially Native Americans, die consistently prematurely – more pronounced in rural



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Rural Cancer Rates

- Reported death rates were higher in rural areas (180 deaths per 100,000 persons) compared with urban areas (158 deaths per 100,000 persons)
- Analysis indicated that while overall cancer incidence rates were somewhat lower in rural areas than in urban areas, incidence rates were higher in rural areas for several cancers: those related to tobacco use such as lung cancer and those that can be prevented by cancer screening such as colorectal and cervical cancers
- ***While rural areas have lower incidence of cancer than urban areas, they have higher cancer death rates. The differences in death rates between rural and urban areas are increasing over time***

Centers for Disease Control and Prevention, MMWR Series July 2017.



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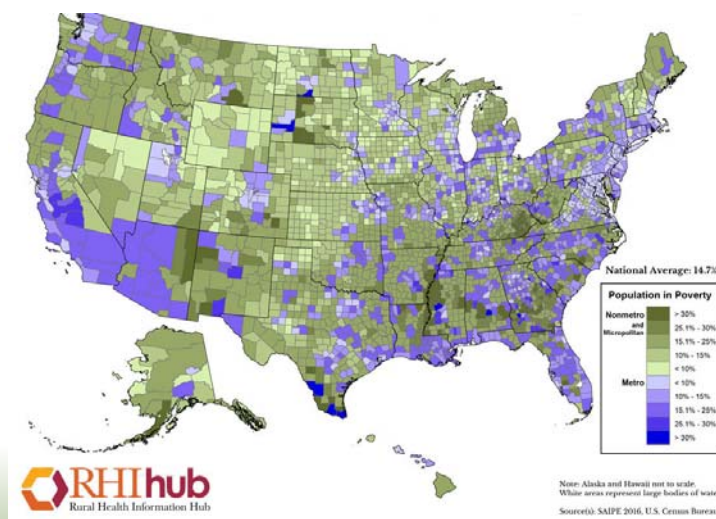
Cancer Care: Rural is NOT a Small Version of Urban

- **Barriers to accessing cancer care services** (financial hardships, such as being underinsured or uninsured; shortage of physicians; oncology specialists; distance from treatment facilities; no personal vehicle and/or lack of access to public transportation to reach services; prejudice/discrimination)
- **Rural specific environment programs** and policies to improve care and access to treatment services in rural areas may interact with the implementation of the intervention and potentially influence effectiveness
- **Role of social determinants of health**, including socioeconomic factors, cultural differences that influence trust in and attitudes toward institutions, medical providers, and government-sponsored programs



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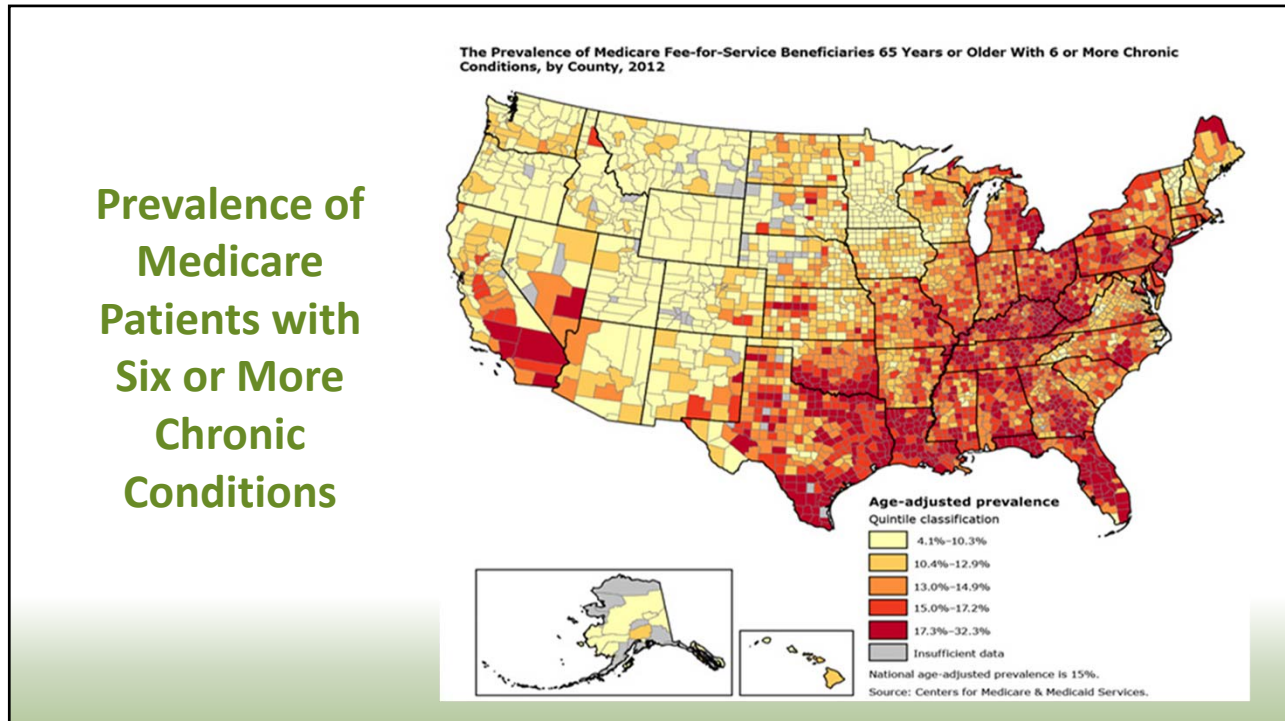
Population in Poverty by County



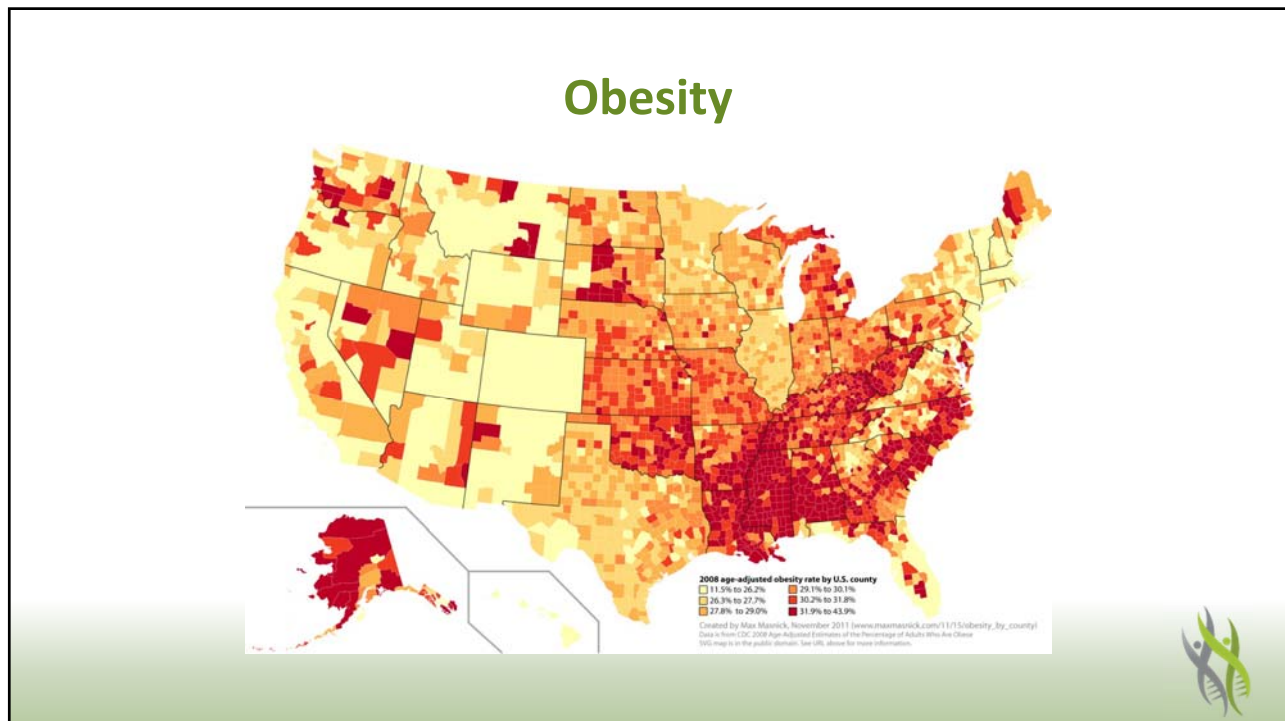
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A (Short) History of Rural Health

- War on Poverty in the 60s
- Community Health Centers, created in the War on Poverty
- Rural Health Clinics –38 Years Old (1978), 4,100 nationwide
- Result of PPS 1983: 440 hospital closures
- Policy Response 1992-2003:
 - State Office of Rural Health (SORH)
 - Medicare Dependent Hospitals (MDH)
 - Critical Access Hospital (CAH) 1997
 - Medicare Rural Flexibility Program (1997)
 - Low-Volume Hospital (LVH) Adjustment (2003 and 2010)
- Patient Protection and Affordable Care Act (ACA) 2010
- Medicare Access and Chip Reauthorization Act (MACRA) 2015



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Shift to New Payment Models/Delivery of Care

Older Models

- Frontier Extended Stay Clinic (FESC)
- Frontier Community Health Integration Project (F-CHIP)
- Rural Community Hospital Demonstration Program

Newer Models

- Global Budget Model
 - Sen. Bob Casey (D-PA)
- 24/7 ER Model with Cost-Based Reimbursement
 - Community Outpatient Hospital
 - REACH ACT



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Treatment of CLL: Current and Emerging Approaches

Farrukh T. Awan, MD

Associate Professor of Medicine

Director of Lymphoid Malignancies Program

University of Texas Southwestern Medical Center

Dallas, Texas

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Objectives

- Introduction and prognostic testing
- Frontline treatment
- Treatment in the relapsed setting



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CLL is the Most Prevalent Cancer in the Western Hemisphere

- Around 200,000 survivors
- Median age at diagnosis is 71 years
- Men twice as likely
- 80% are asymptomatic

American Cancer Society. <https://www.cancer.org/cancer/chronic-lymphocytic-leukemia/detection-diagnosis-staging/signs-symptoms.html>.



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Definition of CLL: iwCLL – 2008/2018

- Small, monomorphic, mature B-cells
- At least 5,000/ul circulating B-cells
- Co-express CD5 and CD23 (need flow cytometry to diagnose)

Hallek M, et al. *Blood*. 2018;131 (25):2745-2760.



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Timing of Therapy

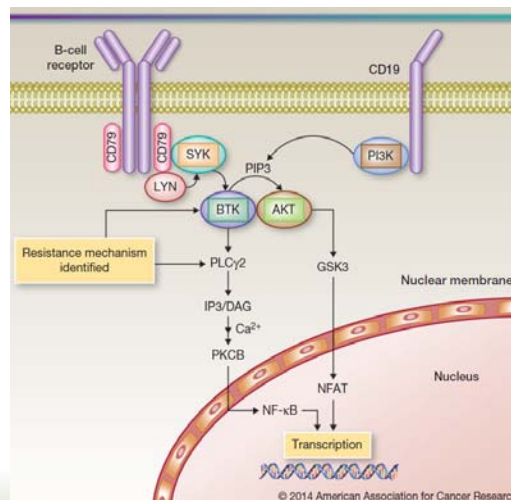
- Constitutional symptoms – How do you feel?
 - Unintentional weight loss of >10% within the previous 6 months
 - Significant fatigue (ECOG PS 2 or worse)
 - Fevers >100.5°F for >2 weeks without other evidence of infection
 - Night sweats for >1 month without evidence of infection
- Objective signs – How are the numbers?
 - Worsening or steroid resistant anemia (<11) and/or thrombocytopenia (<100)
 - Spleen >6 cm below the left costal margin
 - Lymph nodes >10 cm

Hallek M, et al. *Blood*. 2018;131 (25):2745-2760.



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Targeting BCR in CLL



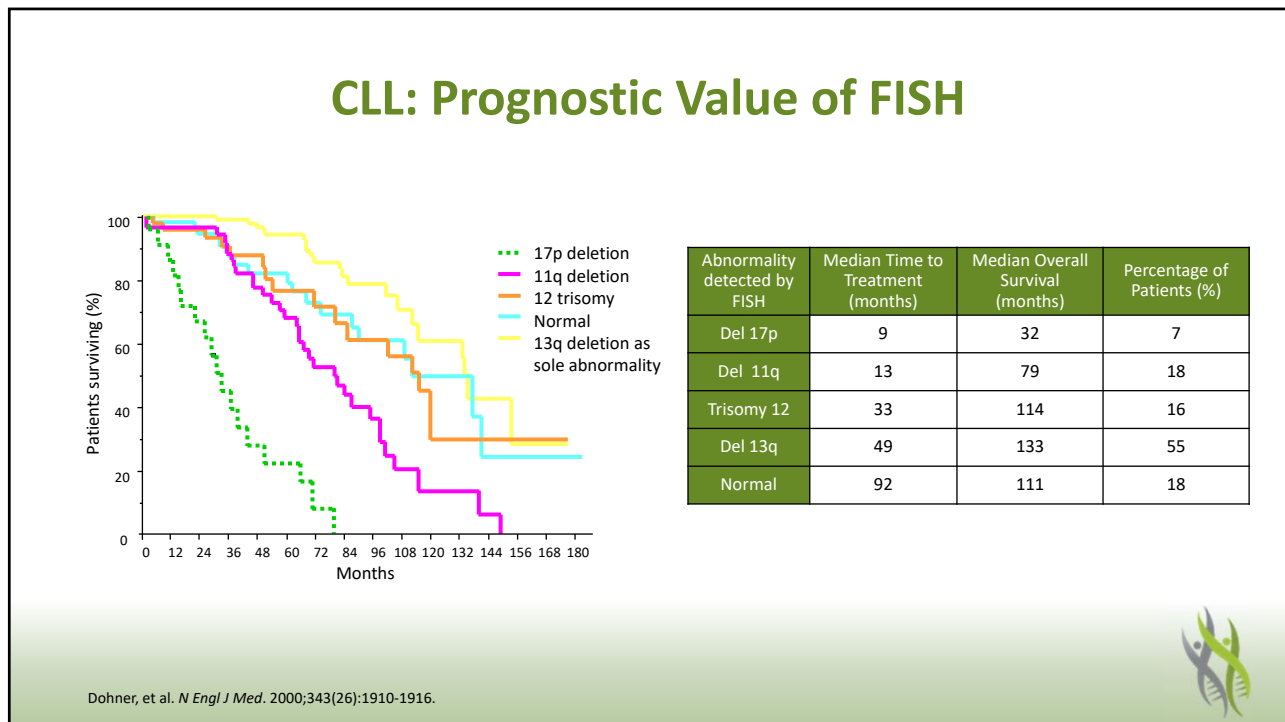
PI3K=phosphoinositide 3-kinase; SYK=spleen tyrosine kinase; BTK=Bruton tyrosine kinase; PIP3=phosphatidylinositol-3,4,5,-triphosphate; DAG=diacylglycerol; PKC=protein kinase; GSK=glycogen synthase kinase; NFAT=nuclear receptor of activated T cells; NF-κB=nuclear factor kappa-light-chain-enhancer of activated B cells. Awan FT, Byrd JC. *Clin Cancer Res*. 2014;20:5869-5874.



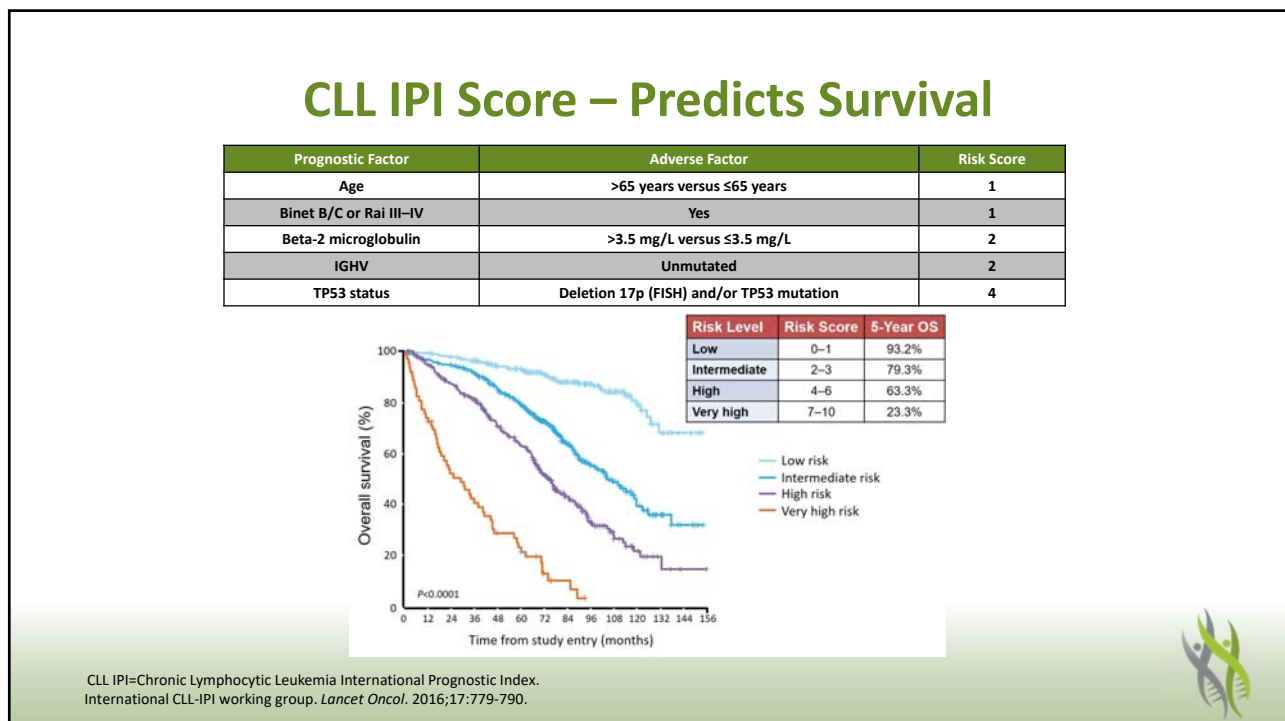
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Objectives

- Introduction and prognostic testing
- Frontline treatment
- Treatment in the relapsed setting



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Chemo-Immunotherapy

PROS

- Tried and tested
- Long-term data available
- Fixed duration
- In this era, may be the cheapest option

CONS

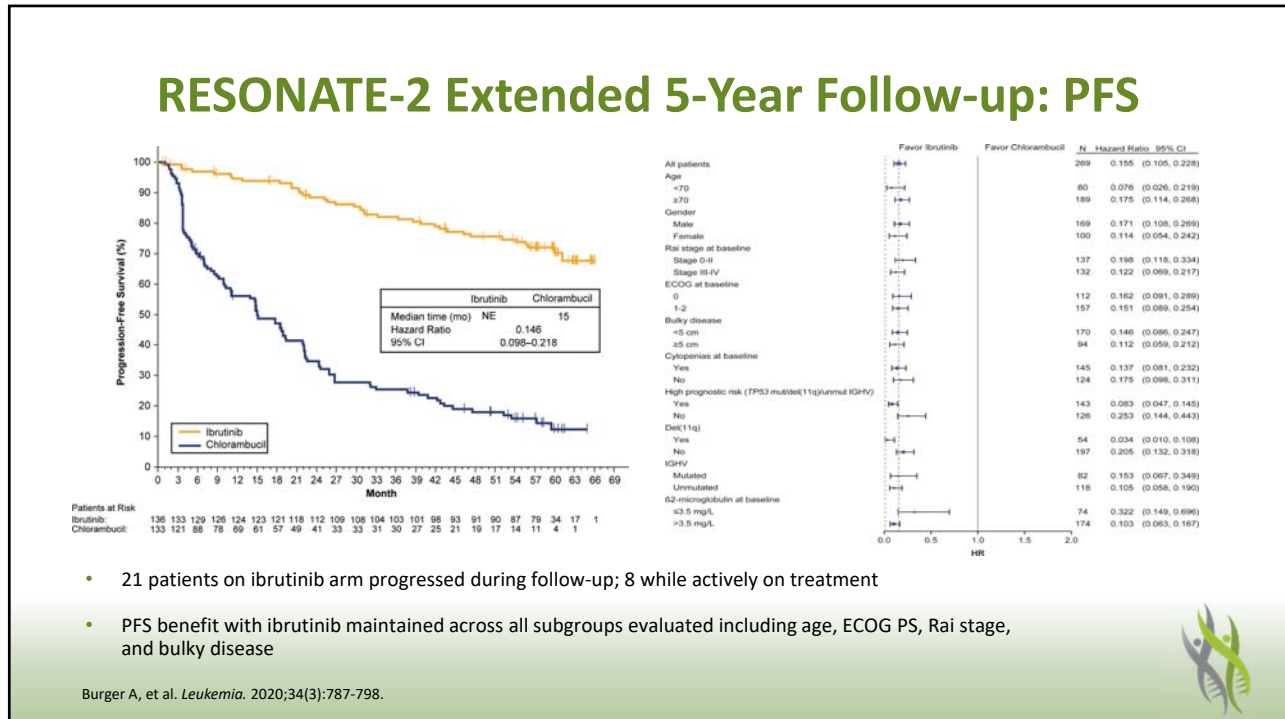
- Side effects
- Not suitable for all patients
- Bone marrow stem cell damage
- Immunosuppressive



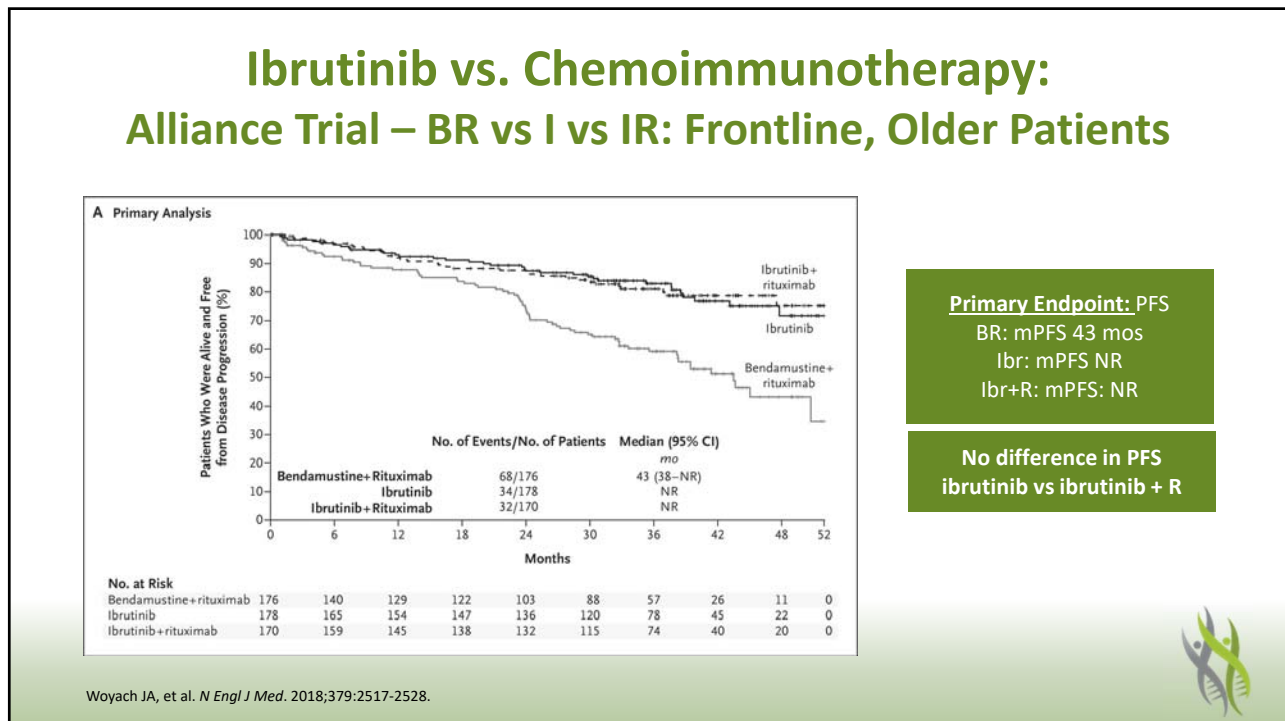
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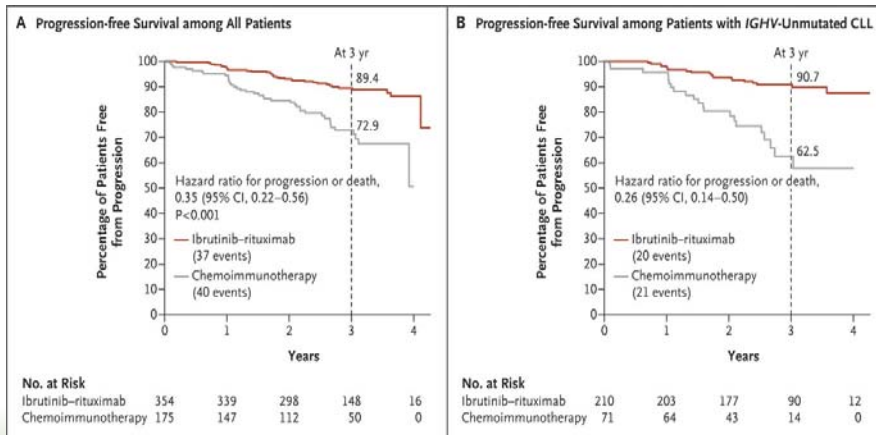


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Ibrutinib vs. Chemoimmunotherapy: PFS Frontline, Younger Patients (EA1912)



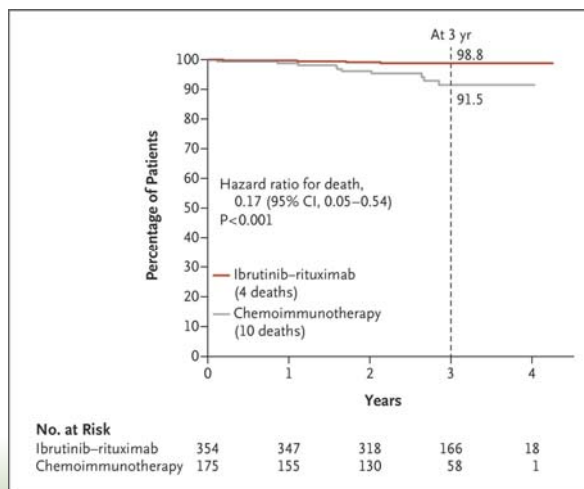
3-year PFS 89.4% for IR and 72.9% for FCR (HR=0.35; 95% CI 0.223-0.558; P<0.0001)

Woyach JA, et al. *N Engl J Med.* 2018;379:2517-2528.



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Ibrutinib vs. Chemoimmunotherapy: Overall Survival Frontline, Younger Patients (EA1912)



3-year OS was 98.8% for IR and 91.5% for FCR (HR=0.168, 95% CI 0.053-0.538; P=0.0003)

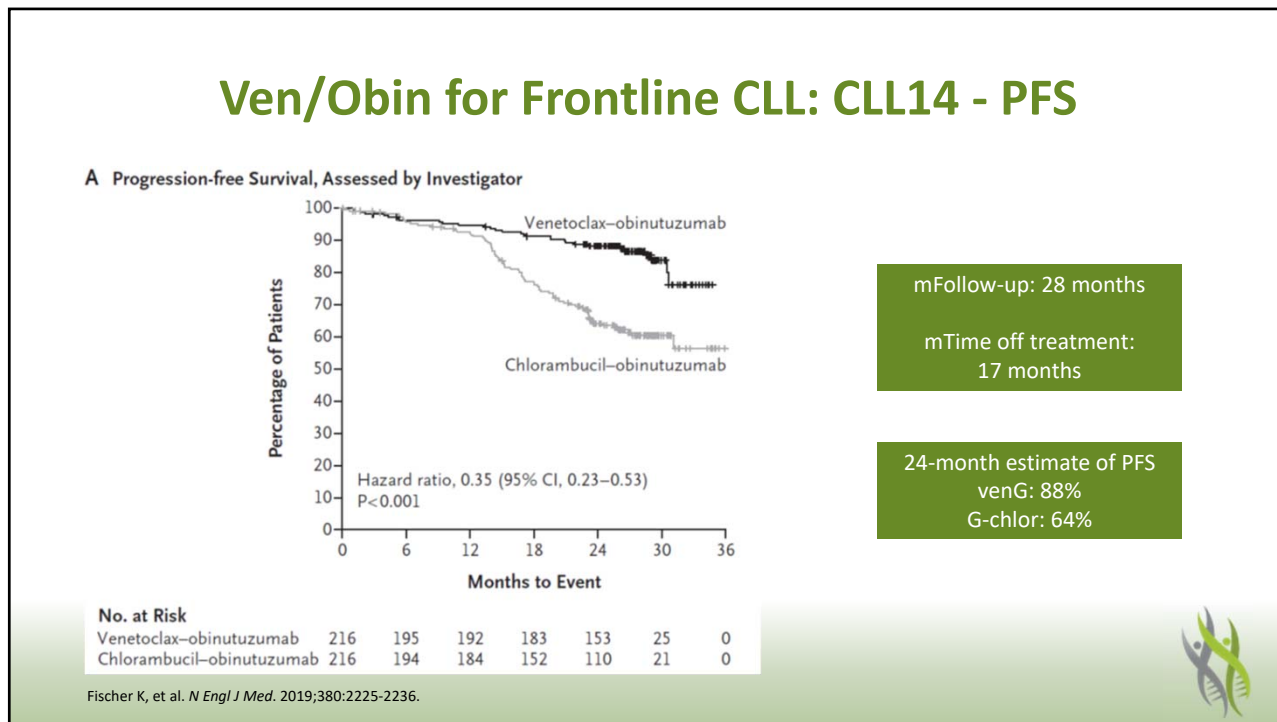
Woyach JA, et al. *N Engl J Med.* 2018;379:2517-2528.



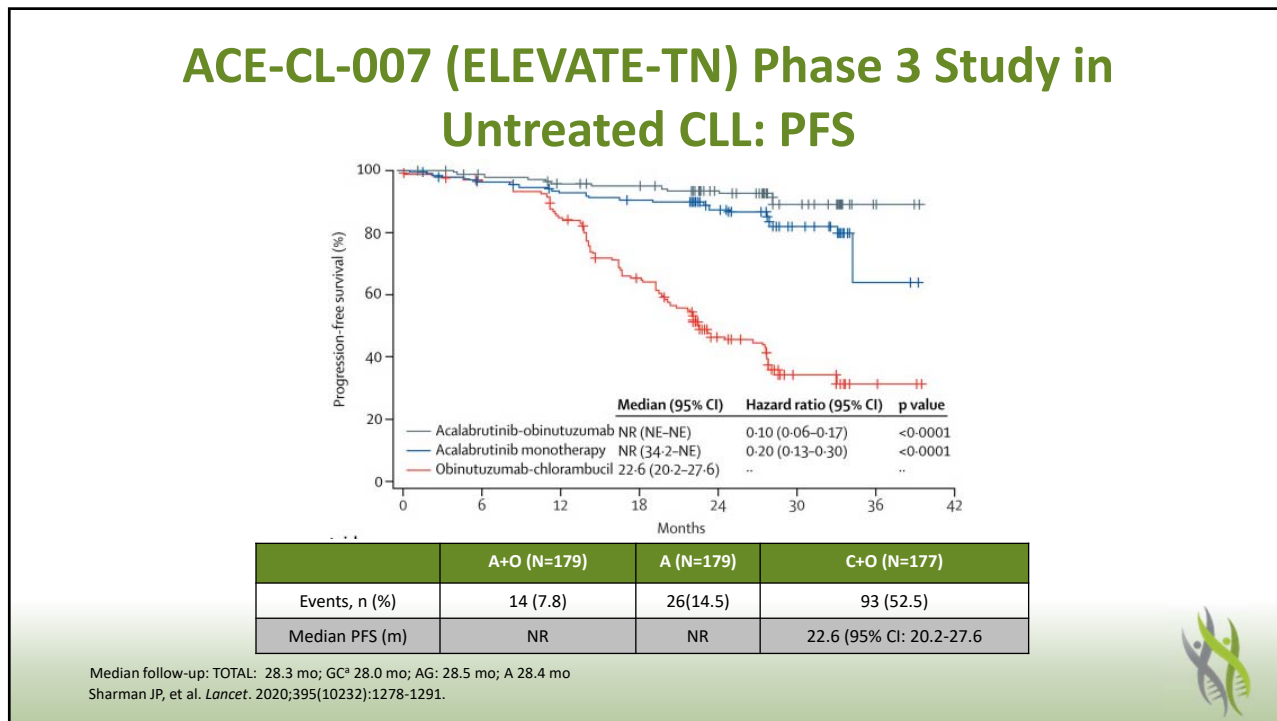
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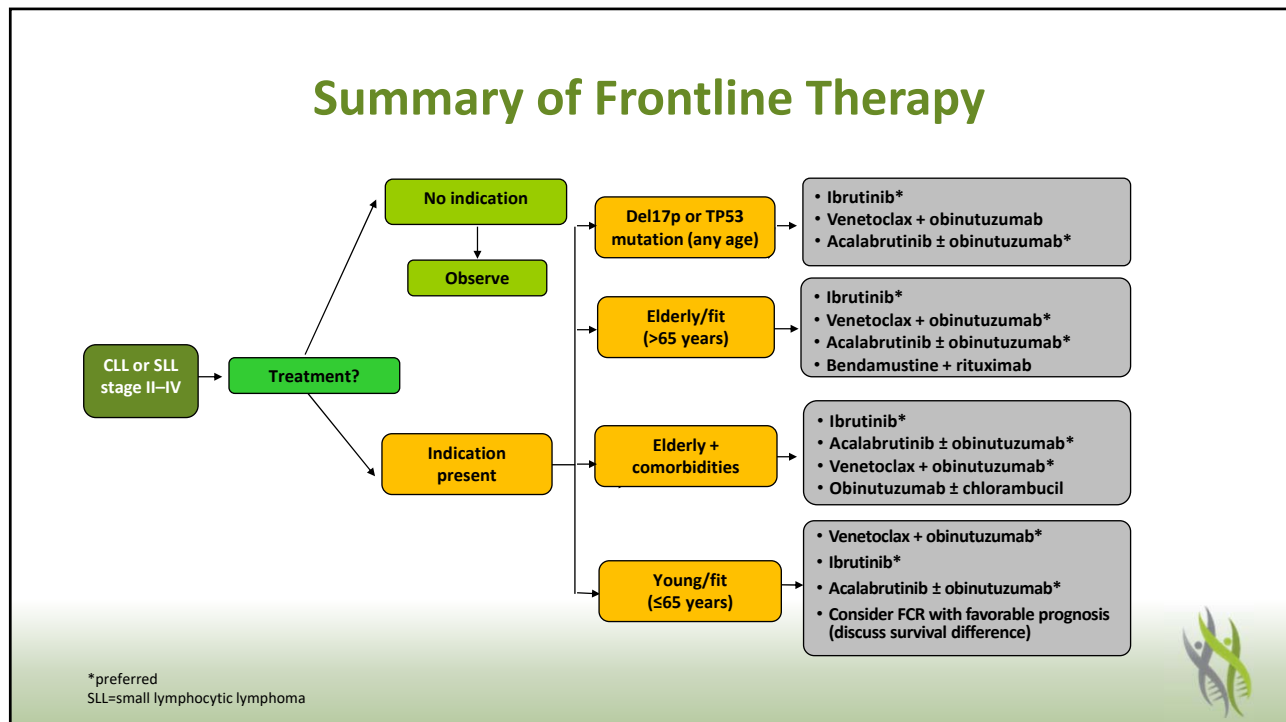
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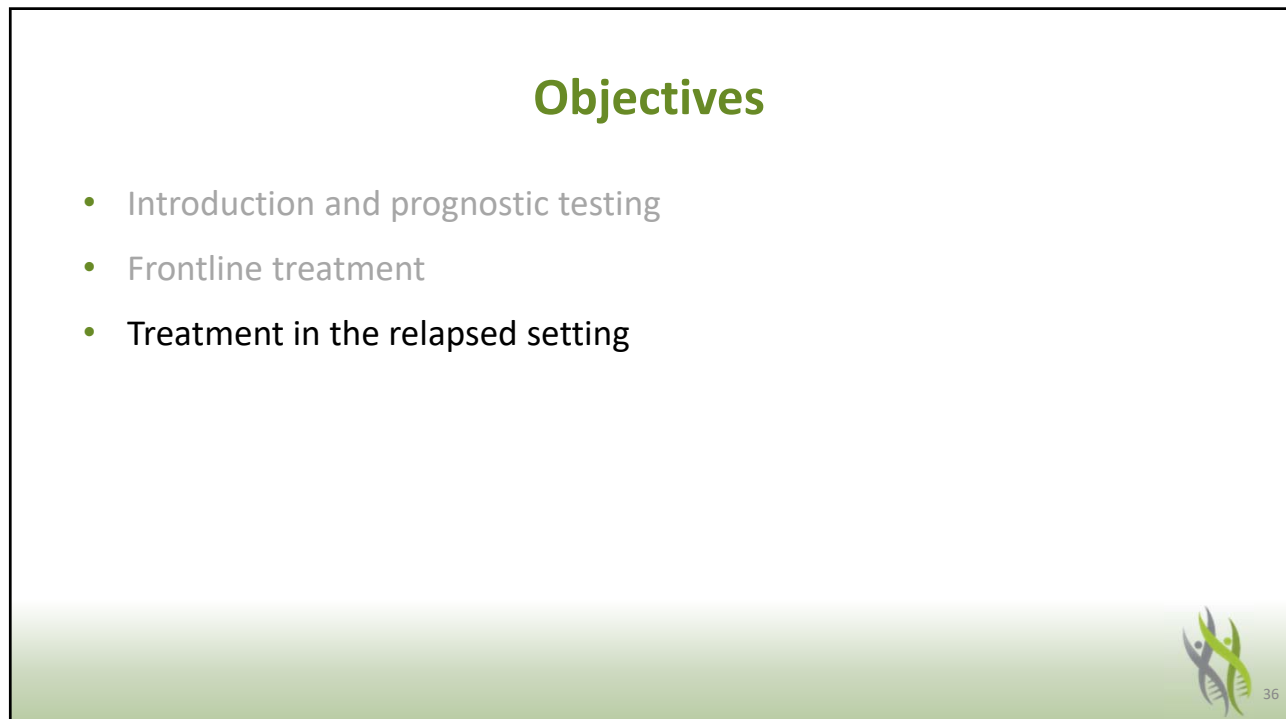
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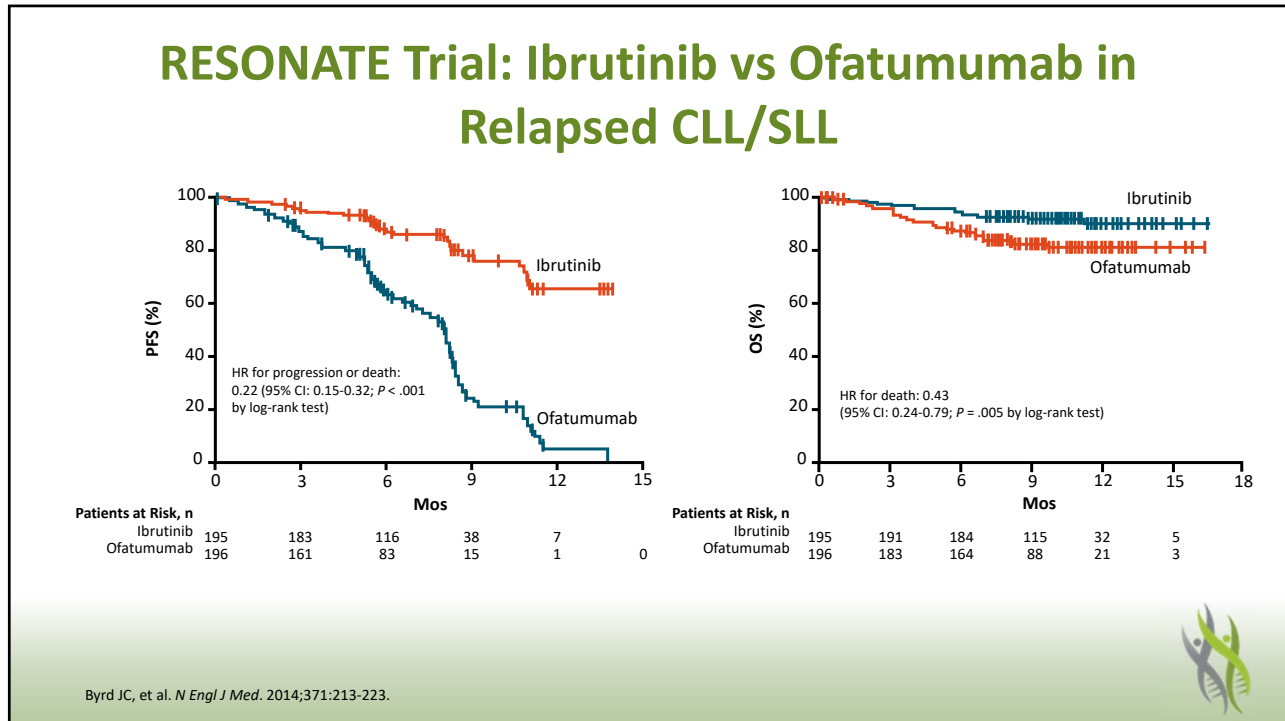
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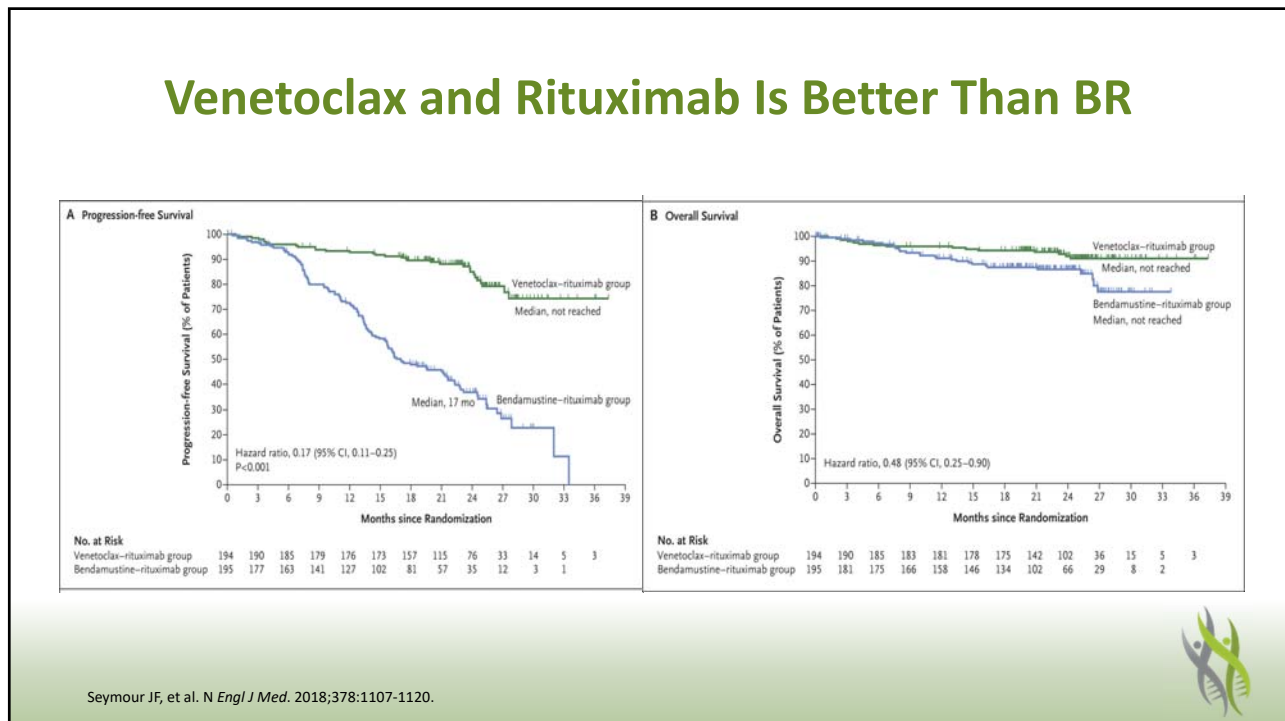
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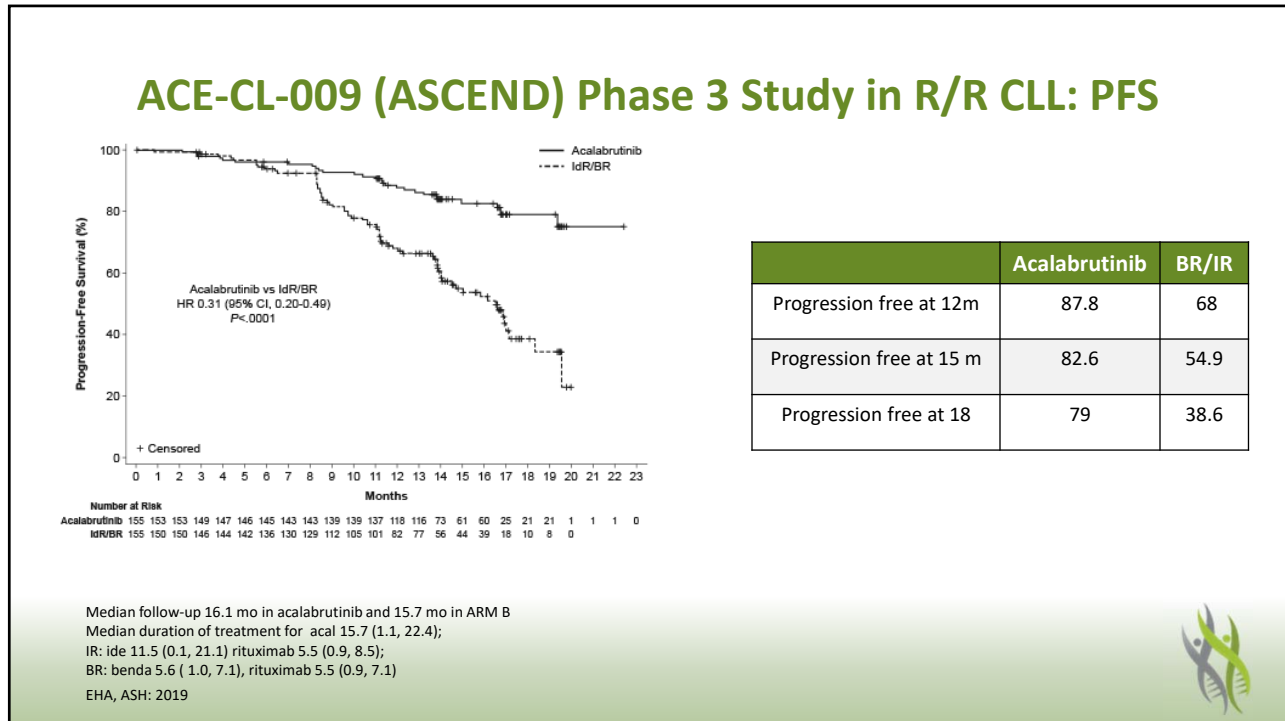
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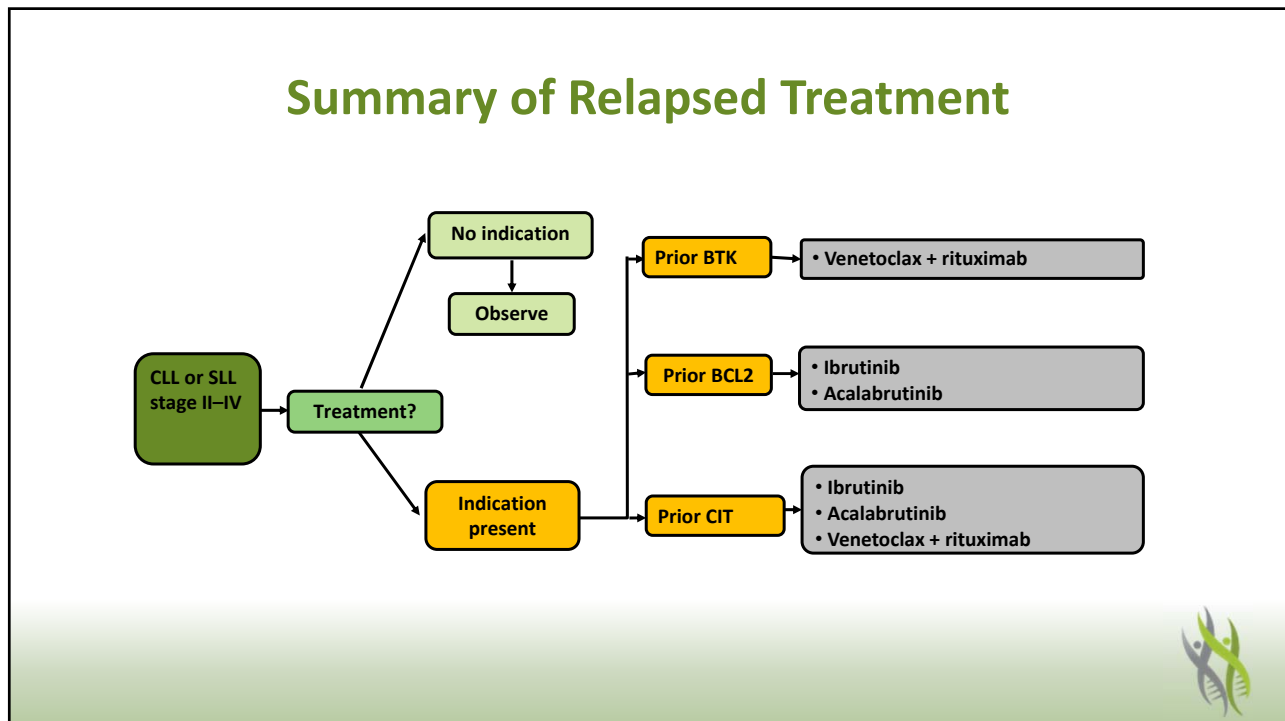
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Conclusions

- Prognostic assessment is critical for patients with CLL prior to starting therapy
- Chemotherapy-based treatments have limited role in CLL
- Sequencing and patient factors are important
- Patient education and input is essential in deciding course of action



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CMS/MIPS Performance and Quality Improvement in Rural Practice

Opal H. Greenway, JD

Stroudwater Associates

Nashville, Tennessee

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Overview

- Rural Cancer Care Resource Guide
- The Centers for Medicare & Medicaid Services Quality Payment Program for Small, Underserved, and Rural Practices
- MIPS Performance and Quality Improvement Worksheet



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Rural Cancer Care Resource Guide

Rural Practice and CLL-Specific Education and Resources

The Centers for Medicare & Medicaid Services (CMS) Quality Payment Program (QPP) for Small, Underserved, and Rural Practices

CMS/QPP Resource Library

MIPS Performance and Quality Improvement Documentation Worksheet



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The Centers for Medicare & Medicaid Services Quality Payment Program for Small, Underserved, and Rural Practices

- Free, customized technical assistance
- Support is available to small practices with 15 or fewer clinicians
- Priority is given to small practices located in

Rural areas

HPSAs

MUAs



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Program-Level Support

- Understanding the general requirements of the QPP
- Determining if you're included in the program
- Choosing appropriate MIPS measures and activities to report
- Submitting data
- Transitioning into an Alternative Payment Model (APM) or Advanced APM

South Dakota:
Telligen gpp-surs@telligen.com
1-844-358-4021



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Practice-Level Support

- Assessing practice readiness
- Implementing certified electronic health record technology (CEHRT)
- Forming partnerships with peers, local stakeholders, regional collaboratives, and more
- Participating in a quality improvement initiative



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Merit-Based Incentive Payment System (MIPS)

- Under MIPS, CMS evaluates the performance of clinicians across four performance categories:

Quality (45%)

Cost (15%)

Improvement
Activities (15%)

Promoting
Interoperability
(25%)

- Scores are added together to produce a MIPS final score
- Your MIPS final score will determine whether you receive a **negative**, **neutral**, or **positive MIPS payment adjustment**



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Overall Flexibilities for Small, Underserved, and Rural Practices

- Exclude clinicians or groups with
 - ≤\$90,000 in allowed charges for covered professional services under the Medicare Physician Fee Schedule (PFS)
 - ≤200 Medicare Part B patients who are furnished covered professional services under the Medicare PFS
 - ≤200 covered professional services under the Medicare PFS
- Give solo practitioners and practices with 10 or fewer clinicians the choice to form a **virtual group** to participate with other practices



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Overall Flexibilities for Small, Underserved, and Rural Practices

- Allow clinicians in small practices to submit data for the Quality performance category through Medicare Part B claims for covered professional services at both the
 - Individual level
 - Group level



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Reporting Requirements for the Quality Performance Category

6 Quality measures

- Including at least 1 outcome measure or high-priority measure in absence of an applicable outcome measure; **OR**

A defined specialty measure set or sub-specialty measure set

- If the measure set has fewer than 6 measures, you need to submit all measures within that set; **OR**

All quality measures included in the CMS Web Interface



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Reporting Requirements for the Quality Performance Category

Collection types

- Electronic Clinical Quality Measures (eCQMs)
- MIPS Clinical Quality Measures (CQMs)
- Qualified Clinical Data Registry (QCDR) measures
- Medicare Part B claims measures
- CMS Web Interface measures
- The Consumer Assessment of Healthcare Providers and Systems (CAHPS) for MIPS survey



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Quality Flexibilities for Small, Underserved, and Rural Practices

- If you are in a small practice, you will be awarded
 - **3 points** in the Quality performance category for measures that don't meet data completeness requirements
 - **6 bonus** points in the Quality performance category if you submit at least one Quality measure

BONUS



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Improvement Activities Flexibilities for Small, Underserved, and Rural Practices

- Small practices, especially those in rural locations and HPSAs, are required to report only **2 activities** in the Improvement Activities performance category
- If you are in a small practice or located in a rural area or HPSA, you will earn **double the points** for each activity you submit:

Medium-weighted
activity = 20 points

High-weighted
activity = 40 points



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Reporting Requirements for the Promoting Interoperability Performance Category

e-Prescribing

Provider to Patient Exchange

Health Information Exchange

Public Health and Clinical Data Exchange

- Within these objectives, there are **6 required measures** in addition to **required attestations**



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Reporting Requirements for the Promoting Interoperability Performance Category

- For PY 2020, clinicians must collect data for each measure for a minimum of 90 continuous days using **2015 Edition CEHRT**

OR



- Submit a **Hardship Exception Application** to have the Promoting Interoperability category reweighted to 0%



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Promoting Interoperability Flexibilities for Small, Underserved, and Rural Practices

- You may submit a **Hardship Exception** Application because you

Are in a small practice

Have insufficient internet connectivity

Have extreme and uncontrollable circumstances

Lack control over your availability to CEHRT

Are using decertified EHR technology



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Policy for Rural Health Clinics (RHCs) and Federally Qualified Health Centers (FQHCs)

- You may be exempt from MIPS
- If you bill for Medicare Part B services exclusively through the RHC or FQHC payment methods, you are not eligible for payment adjustments under MIPS
- If you are a part of an RHC or FQHC and bill for Medicare Part B services under the PFS, payment for such other services would be subject to the MIPS payment adjustments
 - Unless your billings are below the low volume threshold or you meet another exclusion



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Policy for Critical Access Hospitals (CAHs)

- You may be eligible to participate in MIPS
- If you practice in a **Method I CAH**, the payment adjustment would apply to services you bill under the PFS, but not to the facility payment
 - The payment adjustment works the same way if you practice in a Method II CAH but have not assigned billing rights to the CAH
- If you practice in a **Method II CAH** and have assigned billing rights to the CAH, the payment adjustment would apply to the Method II CAH payments



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MIPS Performance and Quality Improvement Documentation Worksheet

2020 Quality Performance Category

- General reporting requirements
- Flexibilities for small, underserved, and rural practices
- Choosing your Quality measures

2020 Improvement Activities Performance Category

- Flexibilities for small, underserved, and rural practices
- Reporting CME activities to fulfill MIPS requirements for the Improvement Activities performance category



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