

New Demonstration Program Would Reward Clinicians for Accepting Risk in Medicare Advantage

Thursday, July 12, 2018

CMS recently announced that it wants to launch a new demonstration program, the Medicare Advantage Qualifying Payment Arrangement Incentive (MAQI) Demonstration. If approved and adopted as a demonstration project, the MAQI Demonstration would waive Merit-Based Incentive Payment System (MIPS) requirements for clinicians who participate sufficiently in qualifying risk programs of Medicare Advantage plans by making such programs qualify for the Advanced Alternative Payment Model (AAPM) under the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA). MACRA replaced the prior Medicare reimbursement schedule with a new pay-for-performance program that's focused on quality, value, and accountability.

Under the terms of MACRA, physicians currently participate in the CMS quality payment program either through MIPS, which adjusts Medicare payments based on combined performance on measures of quality, cost, improvement activities; and advancing care information; or through participation in AAPMs, which require physicians to take on risk for care of patients.

At present, there are very few payment models that qualify for AAPM treatment under MACRA, leaving many physicians subject to MIPS despite a willingness to take on risk. Only the following [CMS models currently qualify for AAPM treatment](#):

- [Bundled Payments for Care Improvement Advanced Model \(BPCI Advanced\)](#)
- [Comprehensive ESRD Care \(CEC\) – Two-Sided Risk](#)
- [Comprehensive Primary Care Plus \(CPC+\)](#)
- [Medicare Accountable Care Organization \(ACO\) Track 1+ Model](#)
- [Next Generation ACO Model](#)
- [Shared Savings Program – Track 2](#)
- [Shared Savings Program – Track 3](#)
- [Oncology Care Model \(OCM\) – Two-Sided Risk](#)
- [Comprehensive Care for Joint Replacement \(CJR\) Payment Model \(Track 1- CEHRT\)](#)

Many Medicare Advantage (MA) plans, however, have been more innovative than traditional Medicare fee-for-service and have adopted risk based payment models with physicians and other providers. As such, participation in such MA Plans advances the goal of moving to a value-based healthcare system. The MAQI Demonstration would give providers taking on risk for participation in MA Plans, credit for purposes of the quality payment program of traditional Medicare. This could potentially continue to spur the innovation seen in Medicare Advantage, especially when coupled with the changes made to plan development and supplemental benefit structures in the 2019 Medicare Advantage Call Letter and 2018 Bipartisan Budget Act.

CMS seeks [public comment](#) on the information collection burdens associated with the MAQI Demonstration, which is under consideration for formal approval. Comments must be received by September 4, 2018.

© 2019 Foley & Lardner LLP



Article By
[Alexis Finkelberg Bortniker](#)
[C. Frederick Geilfuss II](#)[Foley & Lardner LLP](#)
[Health Care Law Today](#)
[Health Law & Managed Care](#)
[All Federal](#)

Source URL: <https://www.natlawreview.com/article/new-demonstration-program-would-reward-clinicians-accepting-risk-medicare-advantage>