



March 22, 2019

Jennifer Kent, Director
Department of Health Care Services
1500 Capitol Avenue
Sacramento, CA 95814

RE: Value Based Payment (VBP) Program, Developmental Screening, and Trauma Screening Proposals in the Governor's Budget

Dear Director Kent:

America's Physician Groups is supportive of the proposed Value Based Payment program and appreciates the opportunity to provide the following comments:

1. The program should allow Managed Care Plans to have the flexibility to create Value Based Payment Programs that incorporate metrics based on clinical standards. Examples include ACOG standards, NCQA (where applicable), AAP, and HEDIS.
2. Develop the program to allow a glide path to attain the overall outcomes. Example: utilize a year over year increase in the percentage of attainment against a benchmark.
3. Allow the use of "supplemental/hybrid data" from chart review or other sources. Many IPAs and medical groups have created innovative ways to capture data that is reportable. By allowing the use of supplemental data, the outcomes for the measures would be more accurate. Certain metrics cannot be proven under existing claims and/or encounter data reporting codes. This would allow Managed Care Plans to capture all data sources, not just claims or encounters.
4. Hold Managed Care Plans accountable to pass down the incentive dollars to the providers who are doing the work. Since the MSOs and IPAs are investing in the IT systems that make data actionable to improve care coordination and patient outcomes, reward providers that make these investments and demonstrate results, including an additional administrative fee. Example: The Integrated Health Care Association's pay-for-performance program incorporated a goal of EMR and practice management adoption in the early years of the program and attributed 20% of the total performance criteria to that goal. In later years the adoption metric was evolved to require meaningful use of the IT systems acquired.

Thank you again for the opportunity to comment on the proposals. APG looks forward to working with the Department and others to successfully implement these proposals in California. If you have any questions, please do not hesitate to contact me at 916-443-4152 or wbarcellona@apg.org.

Sincerely,

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Please reply to Sacramento:
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