

FROM: The Physician-Focused Payment Model Technical Advisory Committee

RE: Request for Public Comment of Draft Version 1.0 of the Proposal Review Process

DATE: April 20, 2016

DUE: May 13, 2016 at 12:00 PM EDT

Introduction: The Physician-Focused Payment Model Technical Advisory Committee (PTAC) requests public comment on the draft review process for physician-focused payment model (PFPM) proposals. The draft proposal review process is outlined in this document on pages 2 through 4. The PTAC requests comments on the process, particularly in the following three key areas:

- 1) **Content of proposals** – what should stakeholders be expected to include in PFPM proposals? What information would be burdensome for stakeholders to produce?
- 2) **Technical assistance** – what types of technical assistance would be most useful to stakeholders in preparing and submitting PFPM proposals?
- 3) **Timeline for review** – what expectations do stakeholders have regarding the timeline for the review process?

Please note: The PTAC is **not** able to accept comments on Secretarial criteria for assessing physician-focused payment models. Per the MACRA statute, PFPM criteria are established by the HHS Secretary through rulemaking in a process announced in the *Federal Register*, which will include information about how to submit comments. Comments on PFPM criteria should **not** be submitted to the PTAC.

Methods to Submit: Public comments may be submitted to the Committee by:

- 1) sending an email message to the Committee at PTAC@hhs.gov;
- 2) registering to speak during the public comment period at the May 4, 2016 meeting; or
- 3) sending written mail to the Committee’s Designated Federal Officer (Scott R. Smith, Office of Health Policy, Assistant Secretary for Planning and Evaluation, DHHS, 200 Independence Av, SW, Washington, DC 20201).

Deadline: The deadline for public comment on this document is noon, Eastern Daylight Time on Friday, May 13, 2016. Submissions are encouraged to be concise and succinct.

Questions: Questions about this Request for Comment may be sent to PTAC@hhs.gov.

Phase I: Proposal Preparation and Submission

1. **Request for Proposals: Once Secretarial criteria are finalized, the PTAC will issue a Request for Proposals including a proposal template and instructions for PFPM proposal preparation and submission guidelines.**
 - a. No letter of intent will be required. Stakeholders may send the PTAC informational materials prior to the criteria being finalized, but with no expectation of review/response. Stakeholders will be required to submit a formal proposal after the Committee issues its Request for Proposals regardless of whether they have submitted informational materials in advance or not.
 - b. Voluntary submission timelines will be included in instructions, for example: proposals submitted [x weeks] prior to an upcoming meeting will likely be reviewed at that meeting, proposals submitted [less than x weeks] prior to a meeting are unlikely to be considered.
 - c. Content of proposals: Once Secretarial criteria are available, the Committee will work to identify what information stakeholders will be asked to include in their proposal submissions.
 - d. General technical assistance will be offered on an ongoing basis, in the form of webinars, white papers, etc.
2. **Proposal Submission: Stakeholders will prepare and submit proposals.**
 - a. Submissions will be accepted on an ongoing basis once criteria are finalized.
3. **Proposal Receipt and Evaluation for Completeness: Upon receipt of a proposal, ASPE staff will evaluate proposals for completeness and adherence to PTAC proposal preparation guidelines.**
 - a. A PTAC member will review the proposal for confirmation if initial review suggests it is incomplete or non-adherent.
 - b. Incomplete or non-adherent proposals will be returned to the submitter within 30 days with the opportunity to revise and resubmit.
 - c. A complete and adherent proposal will advance to preliminary review.
 - d. For each proposal that advances, the Committee will identify conflicts of interest and will make a decision about each member's participation in the review process.

Phase II: Preliminary Review

4. **Preliminary reviewers assembled: PTAC staff will assign complete proposals to [2-3] PTAC Committee members for preliminary review.**
 - a. Proposals will be distributed among all Committee members, excluding those determined to have a conflict of interest for the proposal being reviewed.
 - b. Each team will have at least one physician.

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- c. Committee members will be assigned to review teams of [2-3] people; within each team, each proposal will be assigned a lead reviewer and the other team members will serve as co-reviewers. Lead reviewers may be assigned according to expertise.
 - d. Teams are free to seek counsel from other PTAC members or ASPE/HHS staff with specific expertise.
5. **Preliminary review: Review will be guided by proposal review criteria established by the Secretary.**
- a. Assigned Committee members may complete the review internally, and/or may request additional input from external technical experts to assist in their review.
 - b. If preliminary reviewers have questions about a proposal, submitters will be invited to respond in writing. The Committee may decide to invite submitters to respond during a dedicated non-public session [either in-person or by phone].
 - c. Proposals will be scored according to a standardized scoring methodology (to be developed). Scores will be used to inform the Committee's overall evaluation of proposals; however, scores alone will not be determinative in developing comments and recommendations for the Secretary.
 - d. Proposals determined during preliminary review to be technically deficient will be returned to submitters for revision and resubmission.
 - i. Targeted technical assistance may be provided to submitters using (some or all of) the following approaches:
 - 1. Written summaries of deficiencies and/or weaknesses will be returned to submitters to assist them in revision and resubmission.
 - 2. Submitters will have an assigned PTAC staff program officer, who will be available to answer questions about the comments provided and the process for revisions and resubmission.
 - 3. Submitters may receive guidance from PTAC reviewers on approaches to correct deficiencies and/or weaknesses.
 - e. Proposals considered to have no technical deficiencies will be advanced directly to the full Committee.
 - f. Public comment will be solicited only on proposals that will be considered by the full Committee; proposals returned to submitters for revision will not be posted for public comment until after resubmission.
 - g. After preliminary review, the lead reviewer and ASPE staff will compile preliminary review scoring, comments & recommendations, and public comments in the form of a decision memorandum for the full Committee to review.

Phase III: Full Committee Review

6. **Full Committee review: Each Committee member will review the proposal and results from the preliminary review.**
 - a. If PTAC members have questions about a proposal, submitters will be invited to respond in writing. The Committee may decide to invite submitters to respond during a dedicated non-public session [either in-person or by phone].

7. **Public meeting presentation and deliberation: Proposals will be presented to the full Committee during a public meeting.**
 - a. Every submitted proposal that is complete and has no technical deficiencies will be considered during a public meeting.
 - b. In general, proposals will be considered in the order in which they are received, but depending on volume, proposals that have similar goals or approaches may be reviewed as a group.
 - c. The lead reviewer from the preliminary review team will make a brief presentation summarizing the proposal and comments and recommendations from the preliminary review team.
 - d. The Committee will have a period of deliberation on the proposal, during which Committee members may comment on the proposal as well as suggest recommendations the Committee should make.
 - e. At the conclusion of the deliberation period, the full Committee will make a decision on the proposal under consideration. Decisions may include:
 - i. Recommend – high priority for implementation
 - ii. Recommend
 - iii. Does not meet criteria but desirable to implement
 - iv. Requires additional analysis or information
 - v. Do not recommend, but encourage revision and resubmission
 - vi. Do not recommend

8. **Comments and Recommendations: The full Committee will finalize comments and recommendations and advance them to the Secretary.**
 - a. The lead reviewer from the preliminary review team and ASPE staff will revise the preliminary comments and recommendations to reflect full Committee deliberation. Final comments and recommendations will be recirculated to the Committee for approval prior to being submitted to the Secretary. Final comments may include both majority and minority opinion(s) as applicable.