

# NAATP NATIONAL 2023



NATIONAL ASSOCIATION  
OF  
ADDICTION TREATMENT PROVIDERS

Voice. Vision. Leadership.

# A Value-Based Opportunity: New Leverage for Provider-Led Payment Innovation and Parity Enforcement

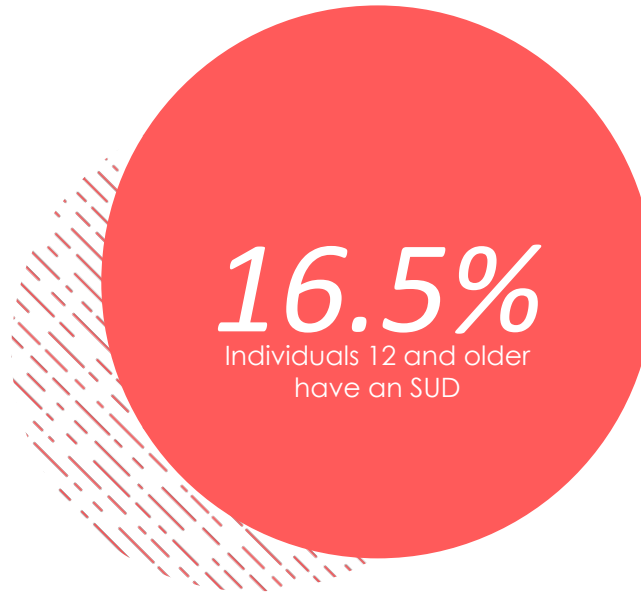
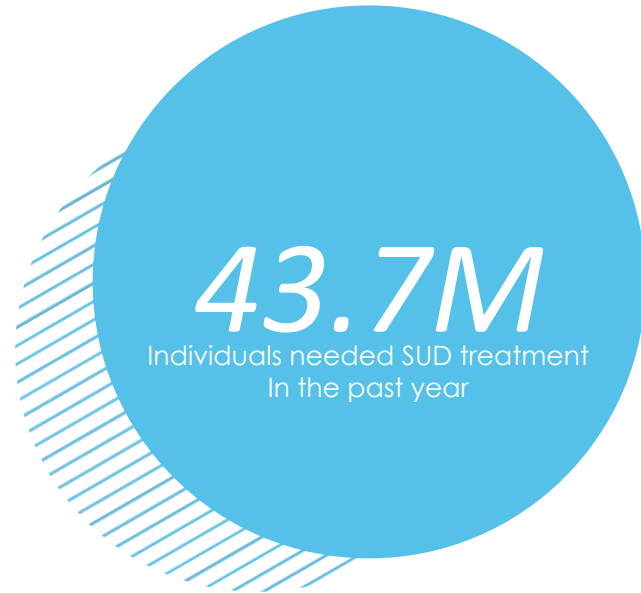
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## Greg Williams

President, Third Horizon Strategies &  
Executive Producer, High Watch Media

# National Household Survey - SUD Prevalence

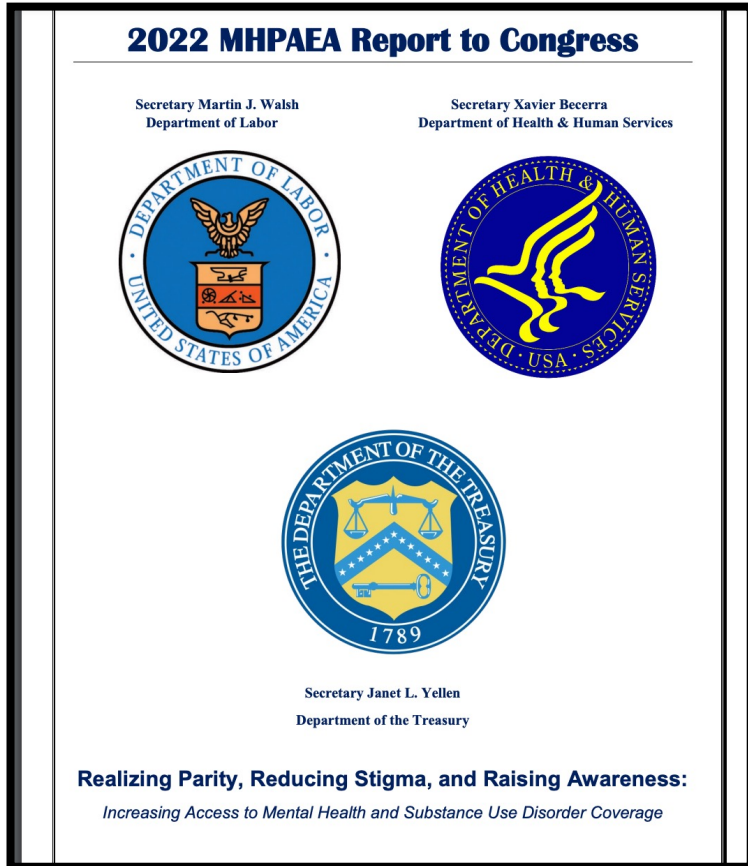


*Among the 40.7 million people aged 12 or older in 2021 with an illicit drug or alcohol use disorder in the past year who did not receive treatment at a specialty facility, **96.8% (or 39.5 million people) did not feel that they needed treatment**, 2.1% (or 837,000 people) felt that they needed treatment but did not make an effort to get treatment, and 1.1% (or 447,000 people) felt that they needed treatment and made an effort to get treatment.*

# Parity Enforcement Emerging ... At Last

**Table I. Parity Requirements Related to Coverage Limits (Private Health Insurance)**

Coverage Limits Subject to Parity Law <sup>a</sup>	Definition of Coverage Limit in Parity Law	Test for Determining Parity Compliance
<b>Aggregate Lifetime Limits</b>	Dollar limitations on the “total amount” the plan will pay for specified benefits for a “coverage unit” (e.g., an enrollee or family).	If a plan <i>does not</i> include aggregate lifetime or annual limits on <i>substantially all</i> medical/surgical (M/S) benefits, it may not impose <i>any</i> such limits on mental health/substance use disorder (MH/SUD) benefits. <sup>b</sup>
<b>Annual Limits</b>	Dollar limitations on the total amount the plan will pay for specified benefits “in a 12-month period” for a coverage unit.	
<b>Financial Requirements</b>	Cost-sharing requirements for coverage units such as co-payments and coinsurance, and “cumulative financial requirements” such as deductibles and out-of-pocket maximums.	A plan may not impose a financial requirement or QTL on MH/SUD benefits that is “more restrictive than the <i>predominant</i> financial requirement or treatment limitation of that type applied to <i>substantially all</i> [M/S] benefits” in the same classification. <sup>c</sup>
<b>Quantitative Treatment Limitations (QTLs)</b>	Numeric benefit coverage restrictions or plan attributes, such as limits on the number of days or visits covered.	
<b>Nonquantitative Treatment Limitations (NQTLs)</b>	Non-numeric benefit coverage restrictions or plan attributes. Examples of NQTLs include “medical management standards (e.g., limits based on medical necessity or if a treatment is experimental)”; drug formularies; step therapy requirements; and “standards for provider admission to participate in a network, including reimbursement rates.”	A plan may not impose an NQTL on MH/SUD benefits unless “any processes, strategies, evidentiary standards, or other factors” used in applying the NQTL to MH/SUD benefits are “ <i>comparable to, and are applied no more stringently than,</i> ” the processes, etc., used in applying the limitation with respect to M/S benefits in the same classification. <sup>d</sup>



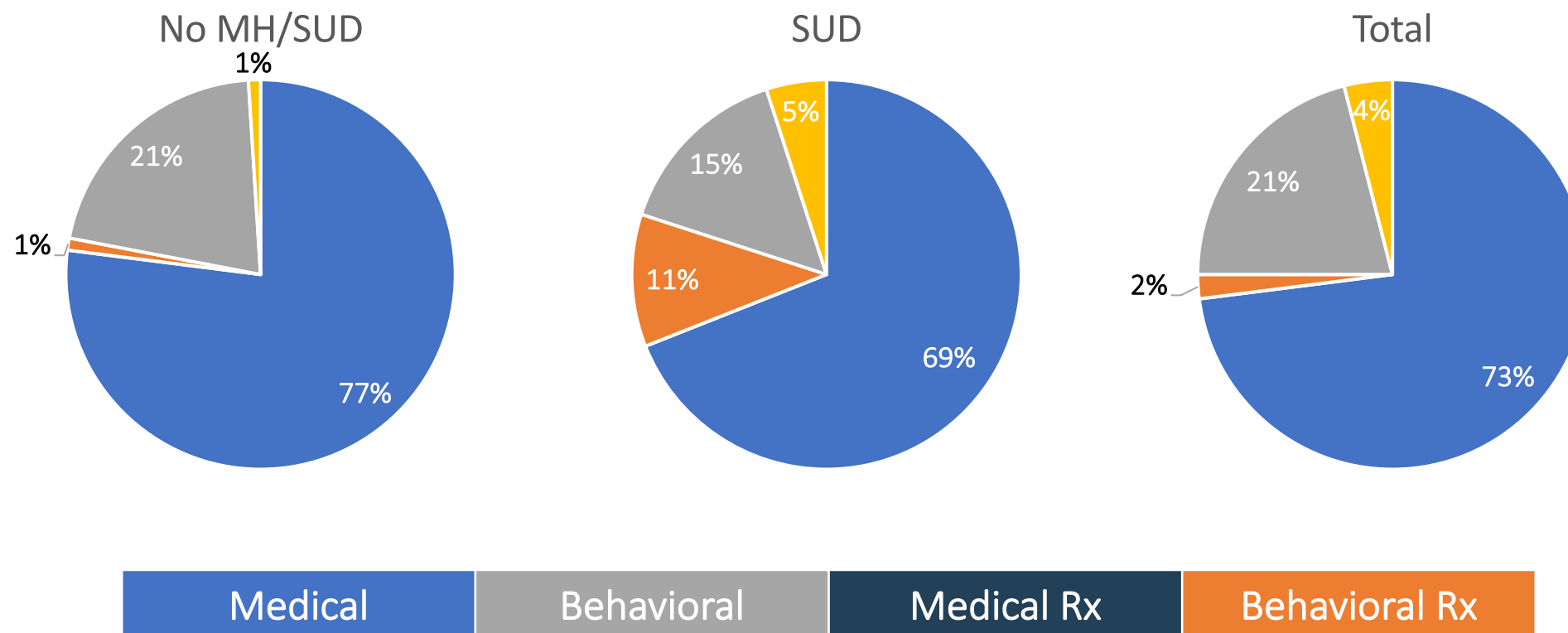
[2022 DOL Parity Report](#)

# Tipping The Pain Scale (Feature Film) – Marty Walsh Clip

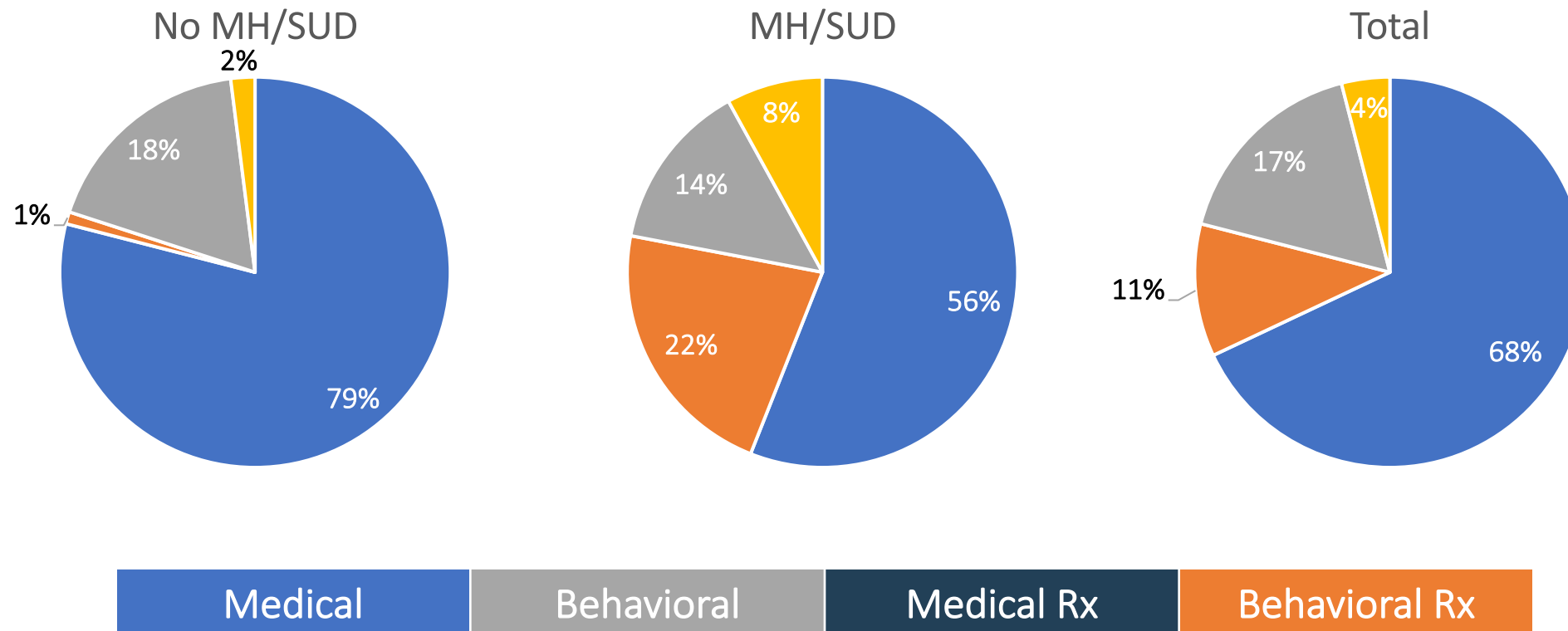


Now Available Through High Watch Media For Licensing:  
<https://www.highwatchmedia.com/tippingthepainscale>

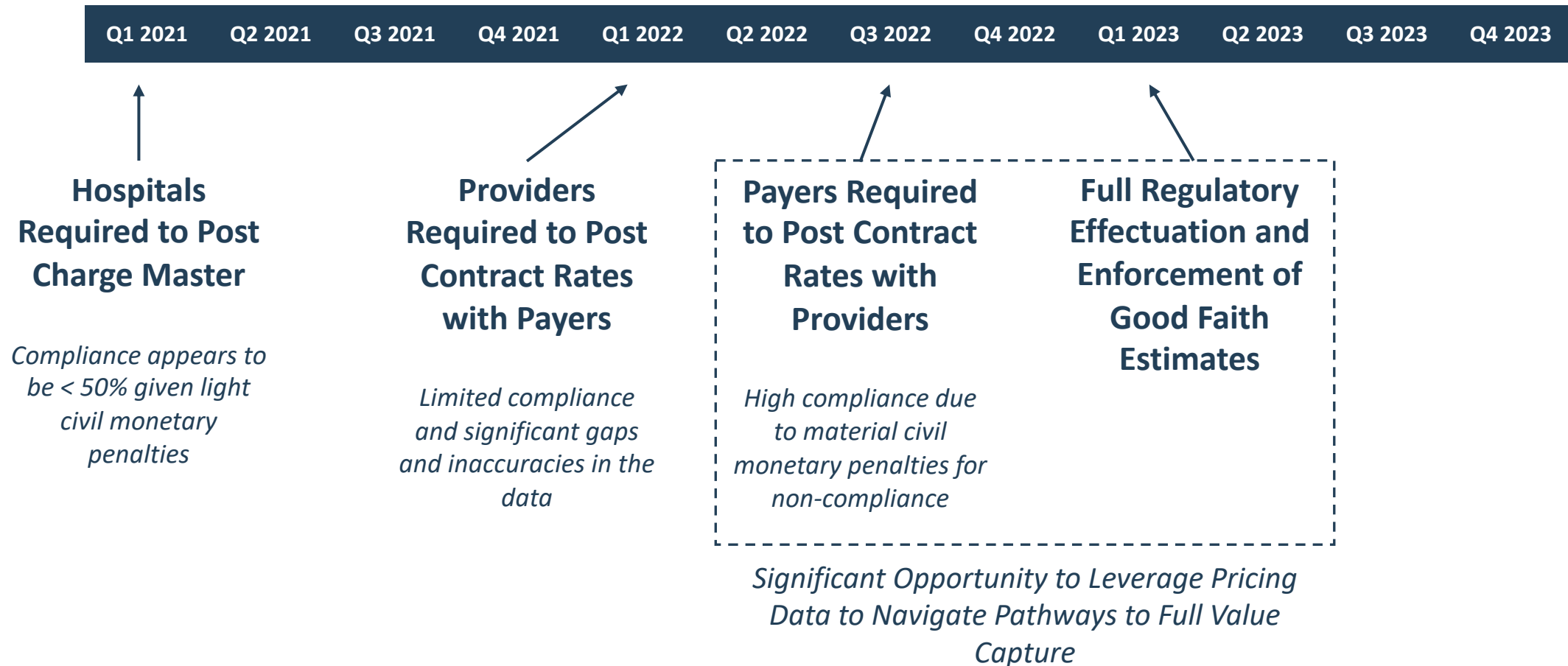
# PMPM Costs for BH/SUD Population, Commercial



# PMPM Costs for BH/SUD Population, Medicaid



# Transparency In Coverage – Federal Regulatory Actions Have Prompted a Significant Release of New Market-Level Data








# Federal Regulatory Actions Have Prompted a Significant Release of New Market Level Data

Transparency in Coverage	Required Dates			
	1/1/22	7/1/22	1/1/23	1/1/24
<b>Machine-Readable File Requirement – <u>Public</u> Disclosure of Pricing Data</b>				
Three Machine-Readable Files (Publicly Accessible)	✓	✓		
In-network Negotiated, Underlying Fee Schedule and Derived Rates for <b>All</b> Services	✓	✓		
Out-of-network Historical Allowed Amounts for All Services	✓	✓		
Prescription Drug Negotiated and Historical Net Prices	✓	delayed until further notice		
Files Updated at least <b>Monthly</b>	✓	✓		
HIOS Identifier or EIN to Identify the Plan	✓	✓		
CPT, HCPCS, NDC, DRG, or Other Code for each Item or Service	✓	✓		
NPI, TIN, and Place of Service Code for each Provider	✓	✓		
Last Date of Price Validity	✓	✓		
Notation of Capitated or Bundled Payment Arrangements	✓	✓		

# Access to Contract Pricing Data Will Create a New Set of Opportunities

 <p><b>Providers</b></p>	<p>Reformulate contracts with competitive pricing, value-based and outcome-based contracts</p>	<p>Focus on quality and cost profiles for value-based purchasing and/or care management programs</p>	<p>Rewarded with a steady influx of members by focusing on high-quality, outcome-centric care</p>
 <p><b>Employers</b></p>	<p>Financial incentives to move employees towards low-cost, high-quality care</p>	<p>Identify networks that best meet the health needs of employee population</p>	<p>Encouraging employees to select high-quality care options at low-cost providers</p>
 <p><b>Payers</b></p>	<p>Renegotiate contracts, referential pricing and savings from high-value services</p>	<p>Adjust networks to ensure adequate member coverage and reasonable access</p>	<p>Member incentives for effective and optimized utilization</p>



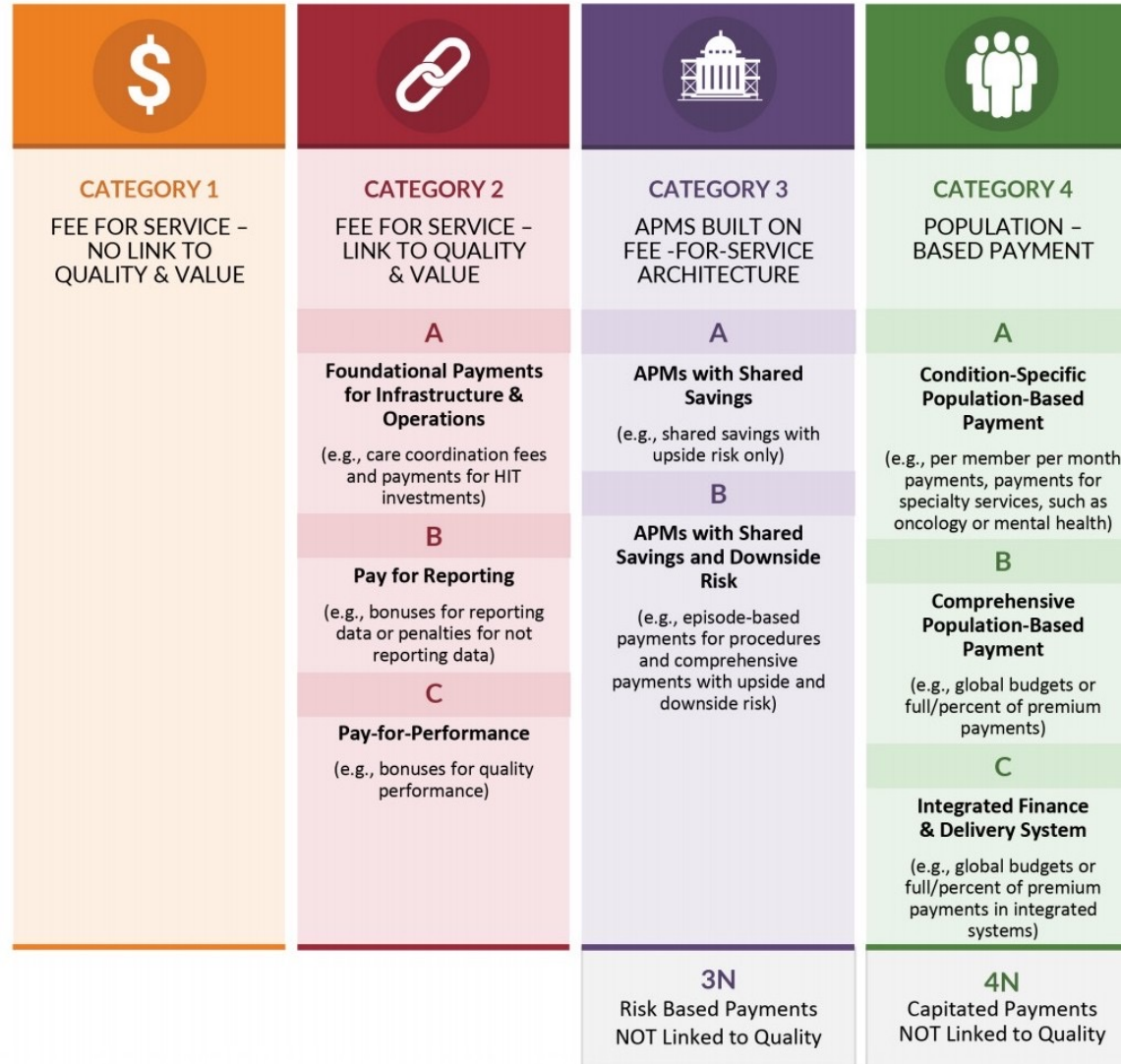
# Contract Pricing Data is *the* Keystone to Unlocking Powerful New Insights

*Our Industry Has  
Defined “Value” in  
Arbitrary Terms*












$$\text{Value} = \frac{\text{Cost}}{\text{Quality}}$$





# HCP-LAN Alternative Payment Model Framework



# SUD Value-Based Payment Model Landscape

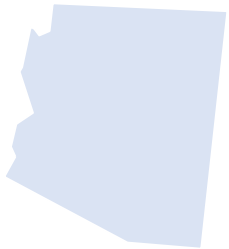
	Category 2 FFS +link to quality			Category 3 Built on FFS architecture with risk		Category 4 Population-Based Payment		
	A. Foundational Payments for Infrastructure & Operations	B. Pay for Reporting	C. Pay for Performance	A. APMs with Shared Savings	B. APMs with Shared Savings and Downside Risk	A. Condition Specific Population Based Payment	B. Comprehensive Population Based Payment	C. Integrated Finance & Delivery System
WV SB 419								
ARMH-APM								
Value in Treatment Demonstration								
P-COAT								
CCBHCs								
PA COEs								

 = Baseline Program  
 = Optional or Being Phased In

# State Models Leveraging Payment Models

In 2022, the [National Academy for State Health Policy](#) highlighted four states using different approaches to leverage payment to improve SUD delivery

## Arizona Targeted Investment Program



- Leverage state directed payments to create 13 integrated clinics to co-located primary care and behavioral health care
- Years 1-3 of the program clinics earned incentivizes by meeting infrastructure milestones
- Years 4-6 of the program clinics earned incentives based on achieving quality metrics

## Pennsylvania HealthChoices and Hospital Quality Improvement for Opioid Use Disorder Program



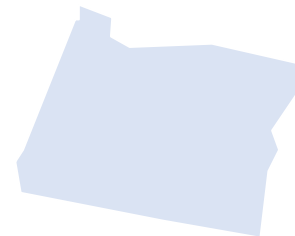
- HealthChoices contract requires BH-MCOs to pay 20 percent of expenditures in VBC arrangements
- The Hospital Improvement program offers hospitals payments for implementing up to four clinical pathways into OUD treatment and then incents the use of the pathways

## New York Medicaid Redesign Team



- VBP Roadmap sets VBP expenditure targets and defines VBP models, including some SUD care models
- MCO capitation rate adjustments are based on MCO performance on a set of measures, including SUD measures such as Initiation and Engagement of Treatment and Follow-up after Discharge from the ED for Alcohol or Other Drug Dependence

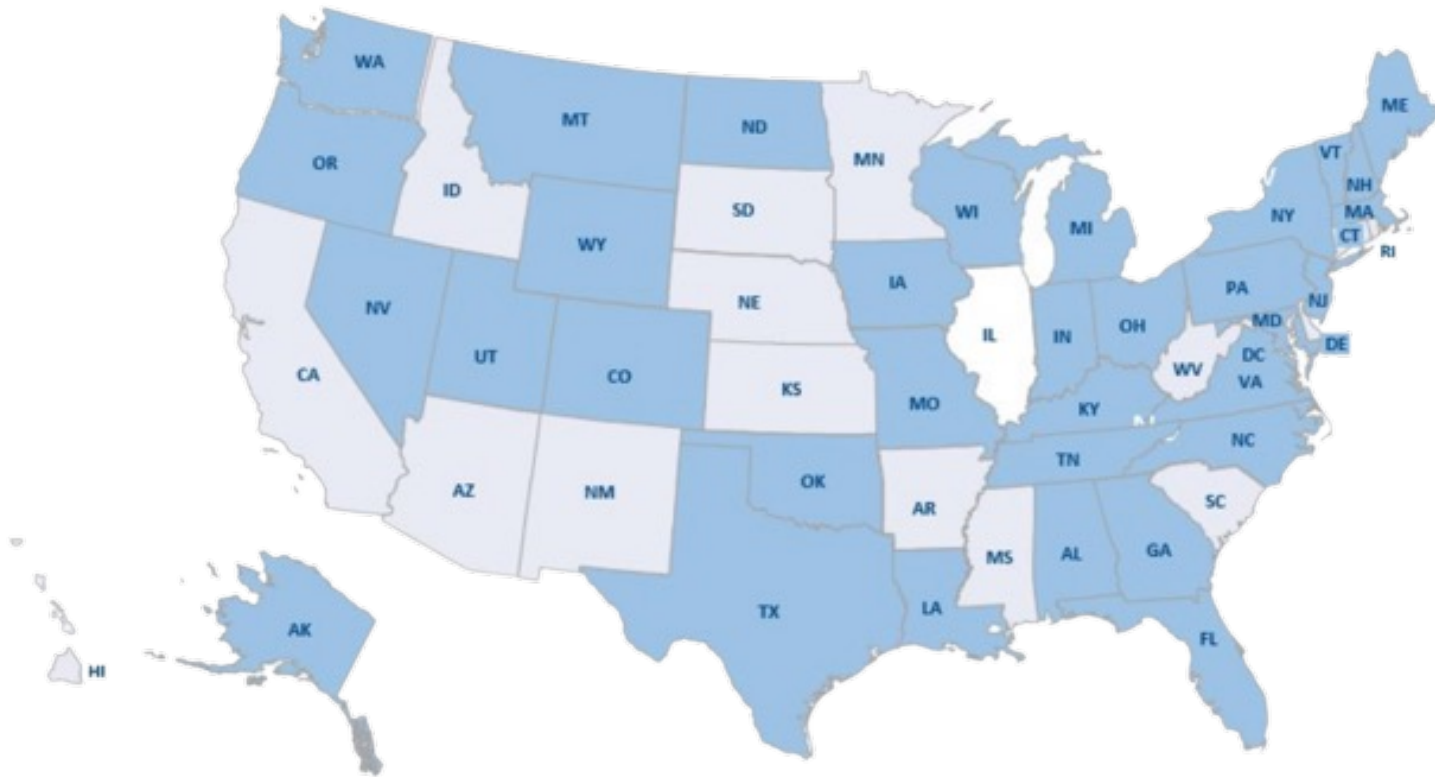
## Oregon Coordinated Care Organizations



- CCOs contracts require VBP for behavioral health providers in 2022
- CCOs can earn incentives based on performance of measures including Alcohol and Drug Misuse Screening and Initiation and Engagement of Alcohol/Drug Abuse or Dependence Treatment.

# Medicare Value in Treatment Demo

The four-year Value in Treatment (ViT) Demonstration for Medicare FFS enrollees creates a new payment model demonstration for participating entities with three primary components:



Medicare Bundle  
Opioid Fee  
Schedule

+

A new per beneficiary per  
month care management  
fee (CMF) of \$125

+

A performance-based incentive  
with respect to quality specified  
by CMS



Addiction Recovery Medical Home Alternative Payment Model  
(ARMH-APM)

Incentivizing Recovery. Not Relapse.



# What's The Opportunity?

## Calculating the Opportunity

Savings for value-based addiction care.

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The Alliance for Addiction Payment Reform developed this tool to help payers, providers, and employers calculate the potential total cost of care savings by aligning incentives and promoting system integration through an Alternative Payment Model (APM) focused on substance use disorder (SUD). By answering a few simple questions, the tool will calculate estimated health savings that could be generated by implementing an APM.

# Live Demo – Value Opportunity Calculator

Select your entity type:

**New Interactive Tool:**  
[www.IncentivizeRecovery.org](http://www.IncentivizeRecovery.org)

**Core Inputs:**

# Medicaid Lives  
# Commercial Lives  
% Prevalence of SUD



Provider

A person or entity that provides  
medical care or treatment



Payer

Health plans/insurers that administer  
health insurance



Employer

An entity that offers a health program  
that is fully-ensured



Government

Publicly funded health programs

# Development of The Addiction Recovery Medical Home – Alternative Payment Model (ARMH-APM)

- A consensus learning model first published in September of 2018 and updated in 2023 by The Alliance For Addiction Payment Reform, a national collaborative of over 40 multi-sector health care stakeholders.
- Only longitudinal shared-risk APM model to-date with a comprehensive, wing-to-wing approach to incentivize sustained recovery moving away from often redundant fee-for-service SUD care.
- It is a model grounded in overarching consistent principles but maintains flexibility and adaptability to be deployed in various market contexts, including both commercial and Medicaid.



+\$40 Billion / Year

# ARMH-APM: Guiding Principles



Recovery from SUD is a process of change whereby individuals achieve SUD remission through **multiple pathways**



Care recovery has **three critical, interconnected states**: pre-recovery/stabilization, recovery initiation and active treatment, and community-based recovery management.



Recovery management requires a **multi-disciplinary care recovery team** who can provide the diverse biopsychosocial elements of treatment needed



A well-managed and **broad continuum of care** ranging from emergent and stabilizing acute-care settings to community-based services and support



Clinical and non-clinical recovery support asset across a continuum of care should be **integrated**



**Co-morbidities and co-occurring** mental health challenges must be managed in concert with the underlying treatment and recovery of a SUD.



Recovery support strategies must accommodate and support the **patient centered** growing varieties of SUD recovery



Integrating economic benefits and risks, **aligning incentives** between payers and the delivery system will promote greater accountability and care design



Recovery is a life-long process and requires a **longitudinal care model** with five years of sustained substance problem resolution marking a point of recovery stability



A **dynamic treatment and recovery plan** with the breadth and flexibility to engender increased recovery capital

# ARMH-APM: Payment Model Elements

## Episodes of Care

Risk/reward is tied to the provision of more integrated and personalized care using the defined ARMH bundle definitions and optional modules

## Quality Achievement Payment

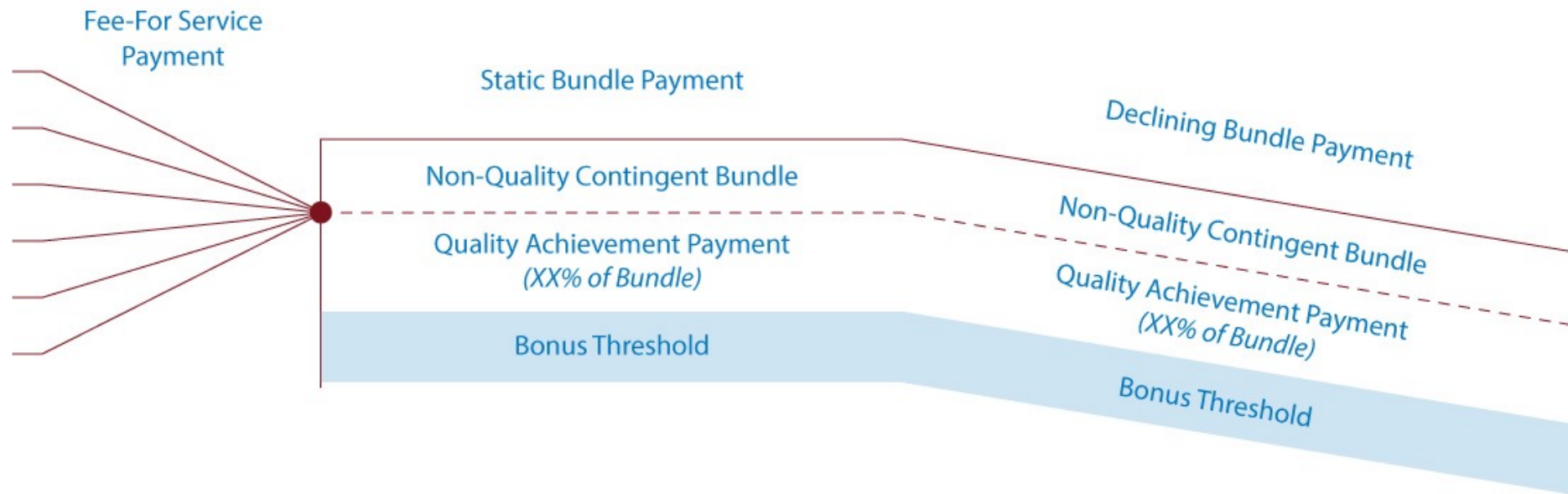
A portion of the bundled payment is tied to achievement of successful patient outcomes

## Shared Savings

Providers may be eligible to share in additional savings created from better coordinating patient care across all health care services, including addiction, behavioral, and physical health services

*Financial incentives to promote improved integration of treatment and recovery*

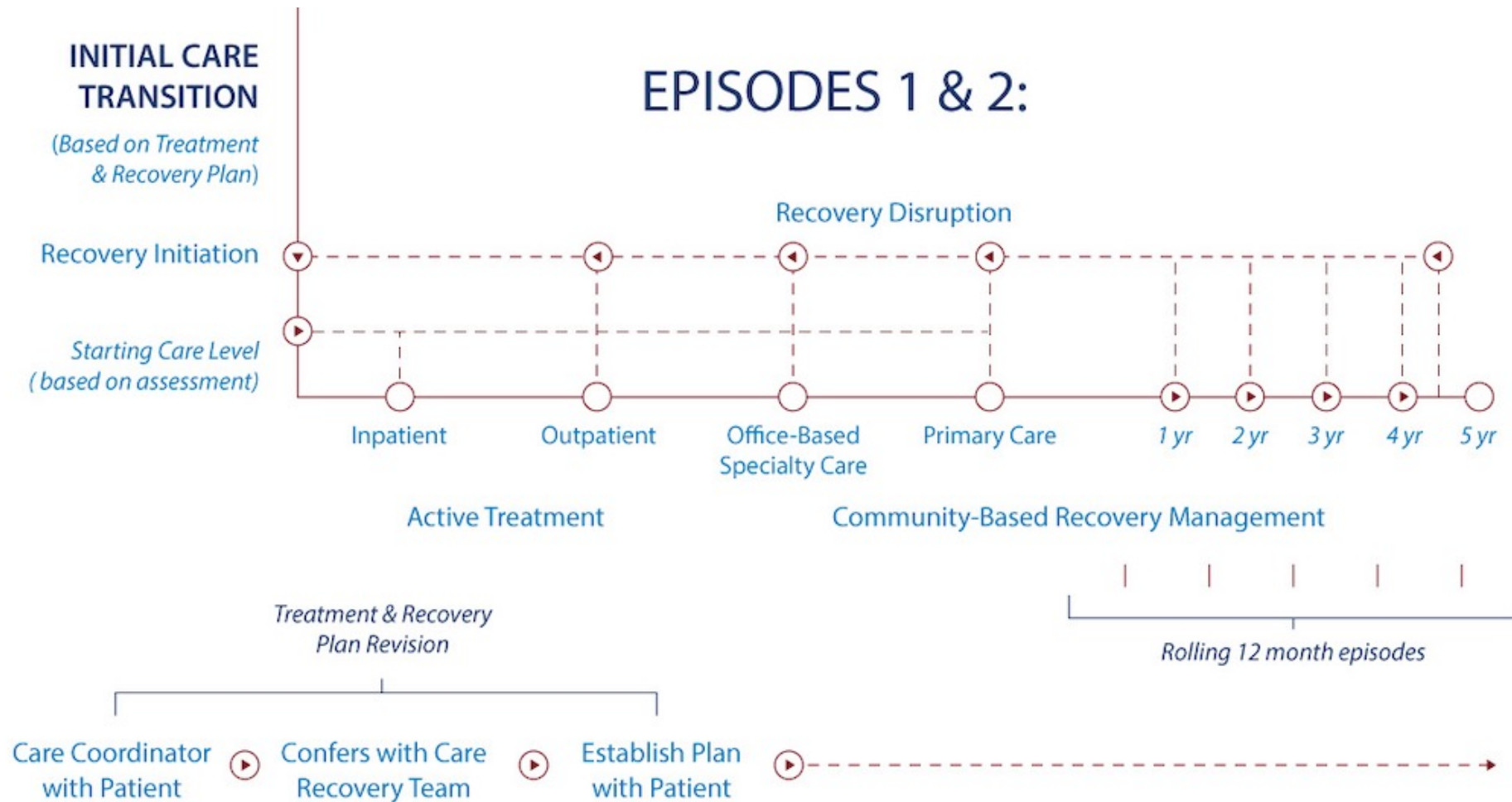
# ARMH-APM: Episodes of Care



# ARMH-APM: Patient Flow



# ARMH-APM: Patient Flow





**Greg Williams**

**[greg@thirdhorizonstrategies.com](mailto:greg@thirdhorizonstrategies.com)**

**[www.incentivizerecovery.org](http://www.incentivizerecovery.org)**

# Thank you for attending

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## Upcoming Events:

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12:00 - 1:30 Leadership Luncheon: Addiction is a Bipartisan Healthcare Responsibility  
Advanced Registration Required

Sponsored By:



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1:45 - 2:45 Workshops

- Managing Increased Patient Acuity and Complexity from both a Clinical and Organizational Perspective
- Critical Juncture: Where Healthcare and Addiction Treatment Converge
- The Science of Spirituality and Healing: The NIH-HEALS Tool