



12/29/2014

Commissioner of Securities and Insurance
840 Helena Avenue
Helena, MT. 59601

RE: NEW RULE 1 STANDARDS FOR PAYMENT METHODS (pertaining to Patient-Centered Medical Homes)

Dear Commissioner:

Allegiance Benefit Plan Management, Inc. has implemented our Complex Care Coordination Program (C3) to provide support to enhance primary care services and promote the development of medical home practices. The Complex Care Coordination Program (C3) provides payment support consistent with NEW RULE 1 STANDARDS FOR PAYMENT METHODS (pertaining to Patient-Centered Medical Homes):

(6)(b) reimbursement for patient-centered medical home services such as:

- (i) care coordination services
- (ii) care management services
- (iii) disease management services
- (iv) population management services

The Complex Care Coordination Program (C3) is a collaboration with Allegiance Benefit Plan Management, Inc. and our fully insured and employer self-funded plans. Letters of Agreement will be offered to qualified and provisionally qualified Montana Patient-Centered Medical Homes, including Federally Qualified Health Centers. Allegiance will attribute client members to enrolled providers, use data analytics to identify patients who may benefit from the C3 Program, and provide reimbursement for covered patient centered medical home services.

Allegiance Benefit Plan Management, Inc. uses Verisk claims data base analytics to attribute client members and perform risk analysis. Attribution logic includes first, member designation of a primary care physician during enrollment, second, assignment to a primary care practice group, and, third, more than one primary care service provided by the primary care practice group. The attributed members are then analyzed through predictive modeling using regression analytics and a nationwide data base to determine relative risk scores and likelihood of hospitalization. Members are then analyzed for chronic diseases including diabetes, coronary heart disease, congestive heart failure, asthma, and chronic obstructive pulmonary disease. Members with chronic diseases are analyzed for gaps in care based on best practices.

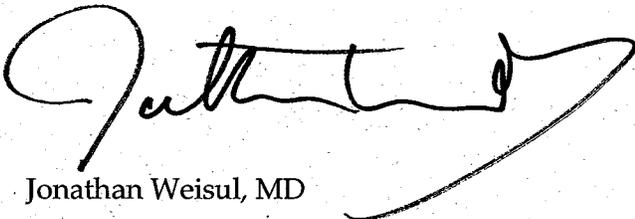
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The primary care providers who have agreed to participate in the Complex Care Coordination Program (C3) are provided with the information on patients who may benefit from care coordination.

The primary care providers may then provide outreach to their patients to participate in the Complex Care Coordination Program (C3). A care coordinator contacts the patient, explains the Program, and obtains permission and commitment for care coordination. A physician driven Plan of Care is developed with engagement of the physician, patient, patient's family, and care coordination. Ongoing care coordination is provided to encourage compliance and achieve the highest level of health and wellness for the patient.

Payment support will be provided according to CPT billing codes for services performed. CPT Code 99487 provides compensation to the provider for non-physician services to achieve patient engagement and acceptance of the Complex Care Coordination Program (C3). CPT Code 99488 provides enhanced compensation to the provider for developing the Plan of Care. CPT Code 99488 compensates the provider for non-physician services to achieve compliance with the Plan of Care. A similar method of compensation for primary care providers will be implemented by the Centers for Medicare and Medicaid Services for all Medicare enrollees in 2015.

Allegiance Benefit Plan Management, Inc. will not burden the primary care providers with additional data reporting of quality measures. Allegiance Benefit Plan Management, Inc.'s Complex Care Coordination Program (C3) is inclusive and will be offered to all qualified and provisionally qualified Montana Patient-Centered Medical Homes, including Federally Qualified Health Centers. Allegiance Benefit Plan Management, Inc. anticipates reporting data consistent with NEW RULE II MEASURES RELATED TO COST AND MEDICAL USAGE-UTILIZATION MEASURES when the final guidelines are developed. We thank the Commissioner of Securities and Insurance for working to enhance primary care services for all Montanans.



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