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Moderator: Andi Dwyer, ACS NNRT, Chair

Series Webinar #4

navigationroundtable.org



# Pursuing Patient Navigation Policy Landscape



December 6, 2023 2 p.m. - 3:15 p.m.

The American Cancer Society National Navigation Roundtable (ACS NNRT) was established in 2017. The ACS NNRT is a national coalition of 80 member organizations to advance navigation efforts that eliminate barriers to quality care, reduce disparities, and foster ongoing health equity across the cancer continuum. The American Cancer Society provides organizational leadership and expert staff support to the ACS NNRT.

# Zoom Best Practices



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What is Medicare, Medicaid and Private Insurers

Overview of the CMS Rule

American Cancer Society

**Cancer Action Network On the Horizon** 

Your Call to Action Opportunity















# National Navigation Roundtable (NNRT) <a href="https://navigationroundtable.org/">https://navigationroundtable.org/</a>

Mission: High quality cancer care for all through evidencebased patient navigation

**Vision**: NNRT is a collaboration that advances patient navigation efforts to eliminate barriers for quality care, reduce disparities in health outcomes and foster ongoing health equity across the cancer continuum.

5-Year Aim (2021 - 2026): To support the creation of a sustainable model for oncology patient navigation to achieve health equity across the continuum of cancer care.











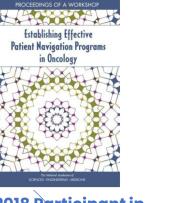


Patient Navigation In Cancer Care – A Review Of Payment Models For A Sustainable Future



**2019 Policy Brief** Funding Models

**Policy** 



2018 Participant in **NAMS Workshop** 

Cancer cancer Journal

**June 2022** 



**Evidence** 

#### **EDITORIAL**

VILEY

Isn't there enough evidence on the benefits of patient navigation?





**Standards** 

**Navigation Task Force announce:** 

**Patient Navigation Sustainability Assessment Tool** 















**Framework** 

Sustainabilit

**Adopted by NNRT** 

**Call to Action Series** 22-23

> May 2, 2023 Archived webinar



**Thought** Leadership



Reaching Communities through Patient Navigation:

**Community Guide Webinar, May 2023** 

**Professional Standards & Metrics** 

**Metrics Toolkit AONN & NNRT August 2020** 

**Oncology Navigation** 

#### slido



Are you or your organization planning to incorporate the CMS Codes for Patient Navigation?

# Policy Task Group Leadership **American Cancer Society National Navigation Roundtable**





Elizabeth Franklin, PhD, MSW Head, US Public Affairs and Patient Advocacy, Oncology Sanofi





Katie Garfield, JD **Director of Whole Person Care** Clinical Instructor, Health Law and Policy Clinic Center For Health Law Policy Innovation Of Harvard Law Sch





Gladys Arias, MPA Principal for Health Equity Policy Analysis and Legislative Support **American Cancer Society** Cancer Action Network (ACS CAN)

#### **Public Insurance**

- Medicare
- Medicaid
- Children's Health Insurance Program (CHIP)
- Veterans Coverage (VA or CHAMPVA)
- State Specific Plans
- Indian Health Service (IHS)



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#### **Centers for Medicare and Medicaid** Services

The federal agency that provides health coverage to more than 160 million people through Medicare, Medicaid, the Children's Health Insurance Program, and the Health Insurance Marketplace. CMS works in partnership with the entire health care community to improve quality, equity, and outcomes in the health care system.



# **Medicare:** The federal health insurance program for:

- People who are 65 and older
- Certain younger people with disabilities
- People with end stage renal disease

#### **Medicare Parts:**

- A: Hospital Insurance
- **B:** Medical Insurance
- C: Medicare Advantage
- **D:** Prescription Drug Coverage



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**Medicaid:** A joint federal and state program that helps cover medical costs for some people with limited income and resources.

The federal government has general rules that all state Medicaid programs must follow, but each state runs its own program. This means eligibility requirements can vary from state to state.





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Health Insurance Marketplace: A service run by the federal government that helps people, families, and small businesses:

- Compare health insurance plans for coverage and affordability
- Enroll in or change a health insurance plan
- Find out about tax credits for private insurance or health programs like Medicaid or CHIP
- Get answers to questions about health care insurance

Some states run their own marketplaces: California, Colorado, Connecticut, DC, Idaho, Kentucky, Maine, Maryland, Massachusetts, Minnesota, Nevada, New Jersey, New Mexico, New York, Pennsylvania, Rhode Island, Vermont, Washington

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Private Insurance: Insurance coverage by a health plan provided through an employer or union, purchased by an individual from a private health insurance company, or coverage through TRICARE.

- **Employment-Based**
- **Direct-Purchase**
- Tricare

- 1. Origins of the Rule—Authority
- 2. Notice of Proposed Rulemaking
- 3. Final Rule Stage





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#### **Federal Rulemaking**

www.regulations.gov www.federalregister.gov

# **Overview of CMS Rule**

















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# **Background**

- Medicare Physician Fee Schedule (PFS)
  - Medicare reimburses physicians (and other enrolled health care providers) for services provided under Medicare Part B based on the Physician Fee Schedule
  - Lists more than 10,000 unique covered service codes and their payment rates
  - Payment policies in the PFS are updated <u>annually</u> via the rulemaking process















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# **Background**

#### Calendar Year 2024 PFS Rule

- Introduced new payment policies (i.e., billing codes) relevant to **patient navigation**
- Proposed Rule: Released July 2023 for Comment
- Final Rule: Released November 2023
- Implementation: January 1, 2024

#### **Key Takeaway:**

Beginning in 2024, Medicare providers can use these new billing codes to seek payment for patient navigation services provided to Medicare enrollees

**Medicare Physician Fee Schedule** 















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		Purpose	HCPCS Codes (i.e., billing codes)
	Principal Illness Navigation (PIN) Services	Assist Medicare enrollees with high- risk conditions identify and connect with clinical and support services	G0023 – PIN services 60 minutes/month G0024 – PIN services, additional 30 minutes G0140 – PIN- Peer Support, 60 minutes/month G0146 – PIN- Peer Support, additional 30 minutes G0511 – Payment of PIN services in FQHCs/RHCs
	Community Health Integration (CHI) Services	Address unmet health-related social needs (HRSN) that affect diagnosis and treatment of a Medicare enrollee's medical conditions	<ul> <li>G0019 – CHI services 60 minutes/month</li> <li>G0022 – CHI services, additional 30 minutes</li> <li>G0511 – Payment of CHI services in FQHCs/RHCs</li> </ul>
	Social Determinants of Health (SDOH) Risk Assessment	<b>Assessment</b> of Medicare enrollee's social determinants of health/social risk factors that influence diagnosis or treatment of medical conditions	<b>G0136</b> – SDOH risk assessment 5-15 minutes, not more than every 6 months

For detailed analysis of *all three* of these new services, see:

https://navigationroundtable.org/wp-content/uploads/Review-of-CY-2024-PFS-Final-Rule-CHLPI-11-03-23.pdf.















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# **WHO Can Receive PIN Services?**

- Medicare patient
- Who has a "serious high-risk condition"
  - Expected to last at least 3 months
  - Places patient at "significant risk of hospitalization, nursing home placement, acute exacerbation/decomposition, functional decline or death"
  - Requires disease-specific care plan, and may require frequent adjustment in medication or treatment regimen or substantial assistance from a caregiver

**Note on Peer Support PIN**: Limited to behavioral health conditions















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#### **WHAT Can PIN Services Look Like?**

#### **Overview - Categories of Services\***

Person-centered assessment

Identifying or referring patient (and caregiver or family) to appropriate supportive services

Practitioner, home, and community-based care coordination

Health education

Building patient self-advocacy skills

Health care access / health system navigation

Facilitating behavioral change as necessary for meeting diagnosis and treatment goals

Facilitating and providing social and emotional support

Leveraging knowledge of the condition and/or lived experience when applicable to provide support, mentorship, or inspiration to meet treatment goals

\*Note: Categories of services differ slightly for Peer Supports PIN

**PIN Services - Services** 















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# **WHO May Provide PIN Services?**

- Certified or trained auxiliary personnel under the direction of a physician or other practitioner, including a patient navigator or certified peer specialist
  - "Incident to" billing
  - Auxiliary personnel may be <u>external</u> to/under contract with the practitioner or practice (e.g., a CBO) if there is "clinical integration"















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# WHO May Provide PIN Services? - Training

#### **Training Competencies\***

Patient and family communication

Interpersonal and relationship-building

Patient and family capacity-building

Service coordination and systems navigation

Patient advocacy

**Facilitation** 

Individual and community assessment

Professionalism and ethical conduct

Development of an appropriate knowledge base, including training on the condition addressed in the initiating visit

\*Note: Where states already have certification requirements, CMS defers to those requirements

PIN Services - Providers











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# **PROCESS of Providing PIN Services**

Initiating Visit

Treatment Plan

Consent

**Provision** of Services

Documentation

Billing

**PIN Services - Services** 















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# <u>Starting Out – Initiating Visit + Treatment Plan</u>

- Before PIN services can begin, billing practitioner must perform an "initiating visit"
  - Visit types: Evaluation and management (E/M) visit; annual wellness visit; psychiatric diagnostic evaluation; or visit involving Health Behavior Assessment and Intervention services
  - Visit elements: Establish medical necessity, develop treatment plan











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#### **Starting Out – Consent**

- Before PIN services can begin, must obtain patient consent
  - Written or verbal
  - Documented in patient medical record
  - Must explain that cost-sharing applies
  - Must be obtained annually
  - Can be obtained by auxiliary personnel















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#### **Provision of Services - PIN Services**

#### **Overview - Categories of Services**

Person-centered assessment

Identifying or referring patient (and caregiver or family) to appropriate supportive services

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Health education

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**PIN Services - Services** 















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# **Documentation**

- Billing practitioner must document in the medical record:
  - Time spent providing PIN services
  - Activities performed by auxiliary personnel
  - How activities are related to the treatment plan
  - Identified SDOH needs, if present













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# Billing

	HCPCS Codes (i.e., billing codes)
PIN Services	<b>G0023</b> : PIN services by certified or trained auxiliary personnel under the direction of a physician or other practitioner, including a patient navigator; 60 minutes per calendar month, in the following activities
	<b>G0024:</b> Principal Illness Navigation services, additional 30 minutes per calendar month
PIN - Peer Support Services	<b>G0140</b> : PIN- Peer Support by certified or trained auxiliary personnel under the direction of a physician or other practitioner, including a certified peer specialist; 60 minutes per calendar month, in the following activities
	G0146: PIN - Peer Support, additional 30 minutes per calendar month
PIN Services when Offered at FQHCs/RHCs	<b>G0511:</b> General care management (code that can be used to support PIN services in FQHCs/RHCs)

<sup>\*</sup>Note: The final rule does <u>not</u> impose a practitioner, frequency, or duration limit for PIN services.

**PIN Services - Billing** 















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#### **Key Distinctions: CHI vs PIN Services**

**Eligibility:** Medicare enrollee with <u>social determinants of health (SDOH)</u> needs that significantly limit the practitioner's ability to **diagnose or treat** the patient's medical problem(s)

#### **Codes:**

- G0019: "Community health integration services performed by <u>certified or trained auxiliary personnel</u>, including a <u>community health worker</u>, under the <u>direction</u> of a physician or other practitioner; 60 minutes per calendar month, in the following activities in the following activities to address <u>social determinants of health (SDOH) need(s)</u>..."
- G0022: "Community health integration services, each additional 30 minutes per calendar month"

Initiating Visit

Treatment Plan

Consent

Provision of Services

Documentation

Billing

**Note:** Only <u>ONE</u> practitioner may bill for CHI services in a given month.

**CHI Services – Differences from PIN** 















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- ❖ In a critical first step to increase access to patient navigation, the Administration announced a proposed rule to reimburse for patient navigation services under Medicare Part B.
- \* ACS CAN submitted two comment letters, including one with National Navigation Roundtable members.
- ❖ On November 2nd, CMS released the final payment rule which takes effect on January 1, 2024. CMS finalized reimbursement for patient navigation services and the final rule aligned with majority of our letter.

















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#### Other Reimbursement Pathways:

- Medicaid Reimbursement for Community Health Workers
- State Plan Amendments
- State Appropriations



Ensuring access **across** the cancer care continuum









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# Participant Call to Action

- > Slido
- Post Evaluation

#### Your action opportunity















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# What kind of technical assistance do you need? (select your top 2 needs)















Thank you to

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