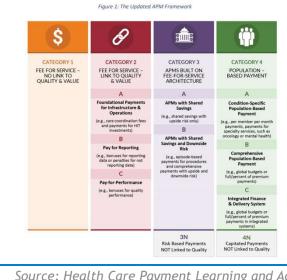


## Alternative Payment Models (APMs) to support value-based care



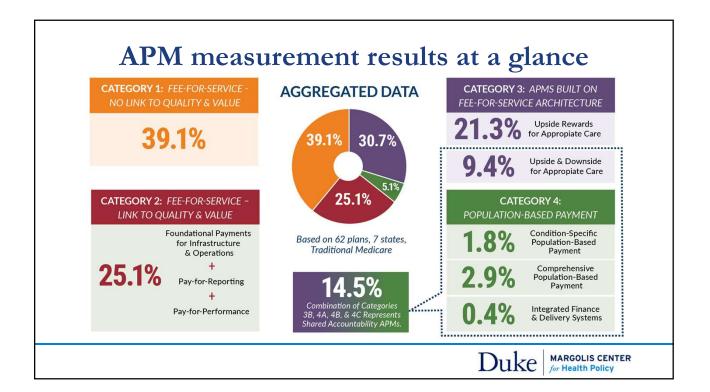
Category 3 and 4 models shift from paying for specific services or providers, to paying at episode or person level – payment depends on performance against benchmarks

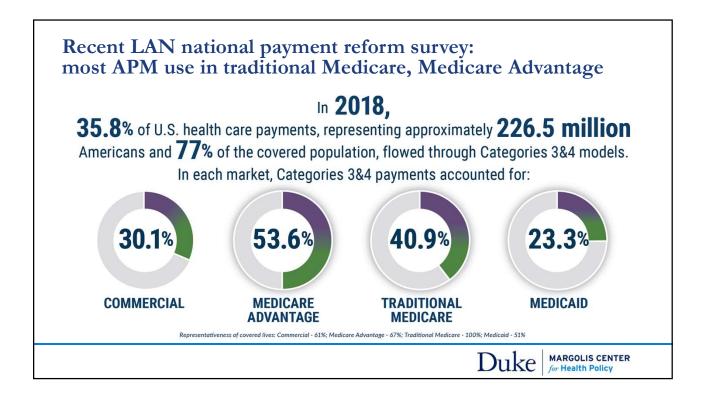
Limited shifts in Category 3 (for example, "shared savings") and greater shifts in Category 4 (for example, partial or full capitation with risk and performance adjustment)

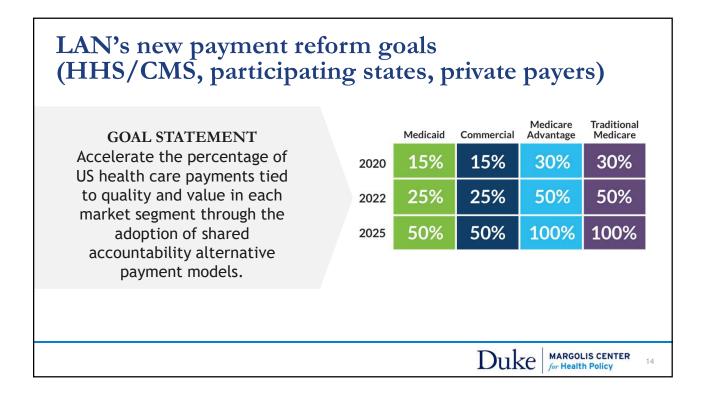
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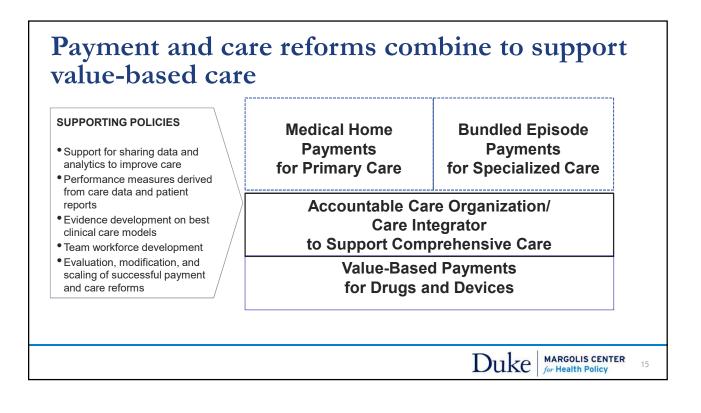
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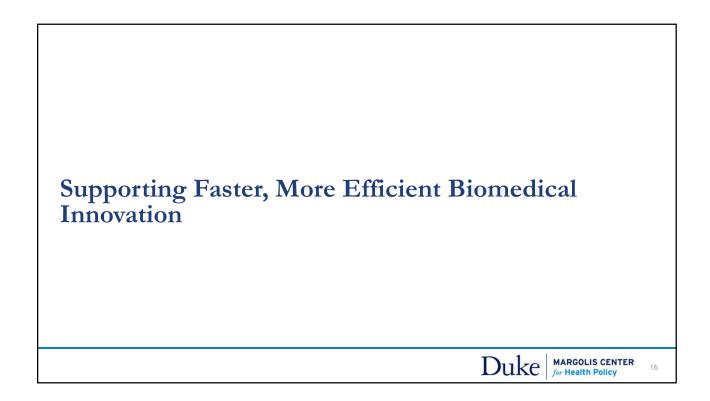
Source: Health Care Payment Learning and Action Network. APM Framework. 2017



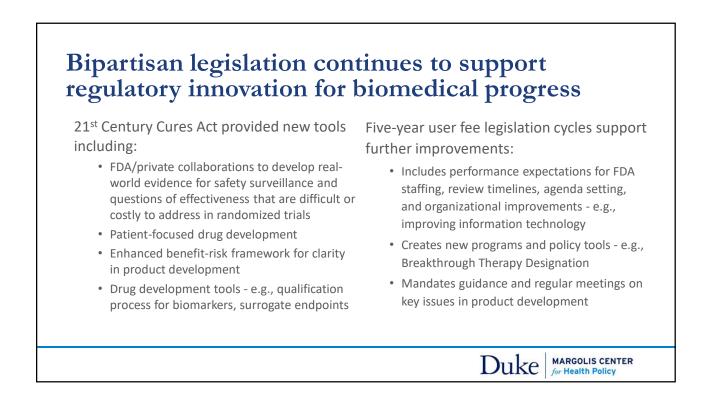








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Expedited FDA drug pathways are leading to	)
faster approvals	

Year	Fast Track Status	Priority Review	Accelerated Approval	Breakthrough Designation
2018	24/59 (41%)	43/59 (73%)	4/59 (7%)	14/59 (24%)
2017	18/46 (39%)	28/46 (61%)	6/46 (13%)	17/46 (37%)
2016	8/22 (36%)	15/22 (68%)	6/22 (27%)	7/22 (32%)
2015	14/45 (31%)	24/45 (53%)	6/45 (13%)	10/45 (22%)
to addr needs Increas betwee FDA an	with the potential ress unmet medical ses communication en developer and id implements g Review"	<ul> <li>Priority Review</li> <li>Drugs with the potential to provide a significant advance in medical care</li> <li>FDA completes review within 6 months (instead of typical goal of 10 months)</li> </ul>	<ul> <li>Accelerated Approval</li> <li>Drug for a serious or life- threatening disease that offers a benefit over current treatments</li> <li>Early approval based on a "surrogate endpoint"</li> <li>Phase IV confirmatory trials required</li> </ul>	<ul> <li>Breakthrough Designation</li> <li>Expedited pathway for promising drugs intended to treat a serious disease where preliminary clinical evidence suggests substantial improvement over existing therapies</li> <li>Unlike Fast Track, requires clinical evidence</li> </ul>
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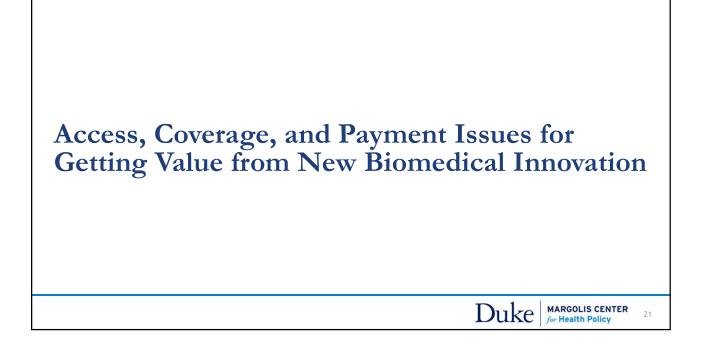


- Priority review for "breakthrough technologies" that represent a substantial clinical advance or address an unmet medical need
  - Ongoing contact with CDRH regulatory review team
  - Support for "efficient and flexible clinical study design" (adaptive trials, intermediate and surrogate endpoints, composite endpoints, use of "real-world" study designs and controls)
- Emerging regulatory strategies for AI-related technologies that are expected to improve continuously
  - Pilot program for clinical decision support software "precertification": organization that meets
    precertification program may follow a streamlined submission process, for faster time to market –
    with expectation of postmarket evidence performance reporting
  - Consideration of revised framework for claims at different levels of predictive value to reflect improving capabilities (modest, moderate, or "diagnostic test level" accuracy and reliability)
  - Methods for regulatory assessment of AI tools using proprietary data or ML algorithms in process

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# VBP arrangements for drugs and devices

- Prices and coverage may be adjusted for *expected* value for example, prices may differ for clinical indications, or broader coverage with evidence development, or prices that adjust as evidence gets stronger
- Outcomes-based contracts link payment for medical products to that product's *actual* performance in patients who receive treatment.
- Subscription payments shift toward paying for access and better outcomes in a *population* for example, using per-member per-month payments with adjustments for impacts on outcomes

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# When are outcome-based payment arrangements likely to add value?

- Promising, but uncertain, health benefits with high cost impacts.
- Uncertain longer-term impacts.
- Potential for treatments to improve with experience and support from better postmarket evidence on their impact.
- Potential for reliable measurement of results and methods that link product to outcomes.
- Alignment with value-based payment reforms for health care providers and value-based insurance design reforms for patients.

### Potential benefits of moving toward valuebased payments

- Better results with more value: More pressure on manufacturers and payers to use new technologies in ways that improve outcomes and lower costs less incentives simply to drive up sales
- **Faster/improved access:** Manufacturer risk-sharing can help reduce uncertainty that payers have about the cost and value of the new technology
- Can reinforce value-based payment reforms for providers (E.g., bundled and episodic payments, medical homes, ACOs) leading to better aligned care.
- Can support collection of better real-world data and evidence: Incentives or requirement to measure outcome and cost impacts over time, which would support better care and payment decisions in the future

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# Challenges in moving to value-based payments

- **Better supporting infrastructure needed:** While FDA legislation has provided substantial public and private resources for determining if medical products are *safe and effective*, including postmarket evidence systems, much less infrastructure investments have been made to clarify whether a new treatment is *reasonable and necessary*, and to improve the evidence available for clinicians, patients, and payers to use treatments effectively
- Limited experience: With limited examples to date, much work in each contract to address measures, how additional value is shared among parties, and other key design issues
- **Regulatory barriers:** Many regulations for medical products are designed for protecting program integrity and avoiding excess costs in fee-for-service payments and like rules for health care providers, need to be modified for payments that are substantial shifts from fee-for-service

