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WHY PLANNING YOUR REIMBURSEMENT STRATEGY IS CRITICAL FOR YOUR COMPANY'S SUCCESS

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#### Topics

- 1. Why 'Reimbursement' is important?
- 2. The US healthcare system (overview)
- 3. Codes and Coverage 101
- 4. The changing landscape
- 5. So, what do we need to do?





# Why 'Reimbursement' is Important?



#### Reality Check - Most Companies Miss Their Plans





While Healthcare Markets Continue to Expand, Time To Market Adoption Continues to Increase





#### Moore's Technology Adoption Life Cycle



Success with 'early adopters' is not necessarily a predictor for broader market adoption



## Considerable Implications to Longer Time-To-Adoption



#### **Delayed revenue**

Need for additional funds and financing rounds

Valuations are negatively impacted

Business development initiatives are delayed

Increased risk of new competitors



### Reimbursement a Key Requirement for Adoption of the Technology

Lack of reimbursement can adversely impact utilization

Yet, reimbursement does not ensure utilization of the technology...



What Does It Mean to 'Have Reimbursement'?

The technology or procedure is covered...

✓ The coverage is sufficiently broad...

 The payment is appropriate covering the costs of physicians, hospitals, distributors and manufacturer





# The US Healthcare System



#### Healthcare Coverage in the U.S.

**United States population** 325 million **Private Insurance Public Insurance** Uninsured 28 million Veterans Health Individual Employer Medicaid Medicare Administration Other purchased + CHIP sponsored (VA) 156-181 15 million 55 million 65 million 9 million million\*\* (11 million in exchanges) Indian Health Tricare Other Service 2.2 million 9.4 million

Different insurance arrangements



#### **Financing Healthcare**

## \$3.8 trillion / >\$11,000 per person

Government	Federal	28%*	- 45%
	State and local * including military, Veterans Admi	17% inistration and DoD	
Private	Business	20%	
	Individuals	28%	- 55%
	Other sources	7%	



#### Medicare



- Federal program
- Covering ~60 million people (18% of the population)
  - All people ages >65; 65< with permanent disabilities; end-stage renal disease or Lou Gehrig's disease



#### Medicaid and CHIP



- A joint federal and state program
- ~62 million (19% of the population)
- People with low income
- Incl. benefits not normally covered by Medicare, like nursing home care and personal care services.



#### Private Insurance

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- Employer sponsored: ~153 million people (49% of the population)
- ~19 million (6%) nongroup insurance.
- Coverage vary considerably, as each plan sets its own policies
- No insurance: ~33

   million people (10% of the population). Out-of-pocket pay or ER / emergency care

15

#### Payments to Hospitals

- \$1.1 trillion (~33% of total health care spending)
- Most payments are based on DRGs
- >750 MS-DRGs
- DRG payments exclude:
  - Physician services
  - Outpatient care





#### Payments to Physicians







## Codes and Coverage 101



#### How Does a New Medical Device Fit Into the Payment System?





#### **Reimbursement - Three Distinct Components**





## **Coding Basics**

- A reimbursement code is an identifier for a diagnosis, drug, device, or procedure
- Codes allow for rapid claims processing

# Code *≠* Coverage



## ICD -The International Classification of Diseases (10<sup>th</sup> Edition)

- Published by The World Health Organization (WHO)
- ~70,000 ICD-10-CM diagnosis codes and ~70,000 ICD-10-PCS procedure codes
- Updated annually
- PCS procedural classification system CM - morbidity classification





#### **DRG - Diagnosis Related Groups**

- Classify hospital cases deemed to have a similar clinical condition and expected similar use of hospital resources.
- An MS-DRG is determined by the principal diagnosis, the principal procedure, and certain comorbidities and complications.
- ~740 DRG categories, defined CMS
- Payment rates are based on the "average" cost to deliver care to a patient with a particular disease.



DRG payments cover all charges associated with an inpatient stay from the admission to discharge, including nursing services, room and board, diagnostic and all ancillary services.



#### CPT -Current Procedural Terminology Codes

- Used to report medical, surgical, and diagnostic procedures and services to health insurance companies.
- >10,000 codes
- Maintained by AMA



#### Requirements for a new code (partial)

- The device used in providing the service received approval from the FDA for the <u>specific purpose</u> described in the proposed CPT code.
- The service is <u>performed routinely</u> across the US at the time of application
- The clinical efficacy of the service is wellestablished and documented in <u>peer review</u> literature (at least one report with U.S. patients).
- Supported by the relevant medical professional society(ies).



#### Development of a New CPT Category I Code

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#### **CPT Category III**

Assigned to emerging technologies, for services that do not meet requirements for Category I code.

#### Requirements

- The procedure is currently performed in humans
- <u>At least one</u> of the following:
  - 1. Support by at least one professional society
  - 2. Peer reviewed literature documents clinical efficacy
  - 3. There is

a) at least one IRB approved protocol of an efficacy study of the procedure in the U.S.

or

b) other evidence of evolving clinical utilization in the U.S.



## HCPCS -Healthcare Common Procedure Coding System

- Primarily for non-physician services - supplies and non-physician services
- >6,000 codes
- Maintained by Medicare



A-codes	Transportation, Medical & Surgical Supplies, Miscellaneous	
B-codes	Enteral and Parenteral Therapy	
C-codes	Temporary Hospital Outpatient Prospective Payment System	
D-codes	Dental Procedures	
E-codes	Durable Medical Equipment	
G-codes	Temporary Procedures & Professional Services	
H-codes	Rehabilitative Services	
J-codes	Drugs Administered Other than Oral Method, Chemotherapy Drugs	
Also: K, L, M, P, Q, R, S, T, V codes		



#### Requirements for Assigning a New HCPCS Code

- The item must be diagnostic or therapeutic in nature.
- Not used only in the inpatient setting.
- FDA approval
- Sufficient claims activity associated with the new item.



#### Standards for Coverage

#### Medicare\*

"reasonable and necessary for the diagnosis or treatment of illness or injury"

- Improved outcomes
- Benefits outweigh risks
- Clinical evidence show outcomes in the relevant population

#### Private Plans\*\*

- FDA approval
- Evidence health outcomes
- The technology must improve net health outcomes
- Technology is beneficial as any established alternatives
- Improvement is attainable outside of investigational settings
  - \*\* e.g., BCBS Evidence Street

\* Section 1862(a)(1)(A) of the Social Security Act



#### Why is Coverage Denied?

Does not meet FDA requirements Not within a defined benefit category (e.g., some preventive services) Insufficient or inconclusive evidence, even when FDA cleared (experimental / investigational)

Evidence not available for target population (e.g., >65 for Medicare)

Inconsistent with existing professional practice guidelines



#### FDA Approval Does Not Predict Reimbursement

- FDA approval of a device <u>allows its marketing</u> in the US. Payers decide whether to <u>cover the device / procedure</u>.
- The FDA process is a structured process, driven by well-defined guidelines. Coverage decisions are subjective, made separately by each payer.
- Clinical data supporting FDA approval (if required) generally limited to a <u>single pivotal study</u> documenting safety and efficacy. Payers' decisions are based on <u>multiple peer-review publications</u> summarizing studies assessing clinical outcomes.



#### Setting Payments for Professional Services

- Medicare Physician Fee Schedule (PFS).
- Services paid under the PFS are divided into:
  - Physician work. Reflecting the physician's time, effort and technical skill required to render the specific service.
  - Practice expense. Including equipment, supplies and office overhead.
  - Malpractice insurance premiums.

- CMS most services have a national rate (payments adjusted to reflect regional costs, type of facility, etc.).
- When a service does not have a national payment rate, each regional Medicare contractor determines the payment rate for its locality.
- CMS is prohibited from using differential payments based upon the specialty of the physician performing the service (commercial payers are not bound by this restriction).
- Most commercial payers use Medicare fee schedule as a benchmark.





# The **Environment** is Changing



# Health spending in the U.S. accounts for 17.7% of GDP

Significant pressures (public, employers, politicians) to reduce rate of increase in cost of care.

#### Mexico Turkey Latvia Hungary Poland Chile Estonia Lithuania Slovakia Greece Israel Portugal Slovenia Czechia Republic of Korea Spain Italy New Zealand OECD median United Kingdom Finland Iceland Japan Ireland Australia Canada Belgium EU15 median Luxembourg France Denmark Netherlands Sweden Austria Germany Norway Switzerland ted States 1,000 2,000 3,000 4,000 5,000 6,000 7.000



£ (purchasing power parity) per person

Healthcare spending per person in OECD countries in 2017

#### Annual Deductibles for Workers Have Increased 8 Times as Wages



Source: Kaiser Family Foundation



# Increases in prices and service intensity have driven most of spending growth

Percent change from previous year for price indexes and real expenditures on medical services by disease, 2001 - 2012




# Changes In Reimbursement are Under Way

Volume

# Value

"Value is measured by patients' health outcomes per dollar spent."





## Quality Improvements (examples)

- Prevention of illness
- Early detection
- ✓ Right diagnosis
- Right treatment to the right patient
- Rapid cycle time of diagnosis and treatment
  - Fewer invasive treatments

Fewer complications

 $\checkmark$ 

 $\checkmark$ 

 $\checkmark$ 

- Fewer mistakes and repeat treatments
- Faster and more complete recovery
- Lees need for long-term care
- Fewer recurrences
- Reduced need for ER visits
  - Slower disease progression



 $\checkmark$ 

## The Emerging Landscape



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## Many Reforms and Initiatives are in the Pipeline

#### CMS Vision

*"We are moving to a system that rewards value over volume.* 

Start paying for value will foster innovation, as providers look for ways to compete for patients by providing the highest quality care at the lowest cost." Accountable Care Organizations (ACO) Shift from fragmented care to coordinated care and measured performance

#### Value-Based Purchasing (VBP) Program

Reward value and patient outcomes, instead of volume of services

Reduced Payments for Hospital Acquired Conditions Stop paying for certain conditions developed while the patient is hospitalized

Hospitals Readmission Reduction Program Reduce payments to acute care hospitals with excess readmission

#### **Payment Reforms**

Incentivize Quality, not Volume; pay-for-performance (value)



## Payers Must Balance Conflicting Objectives



Maintain costs, address government, employers and patients' desire to keep costs down

Compensate providers for their costs of delivering required care





# So, What Do We Need To Do?



Addressing reimbursement early in the process changed from

Failure to address reimbursement early in the project life changed from

Past

Not important

Yesterday

Nice to do

Today

Important / critical

- Not a big deal
- Bad practice
- **Business malpractice**



## Reimbursement Affects Financial Success





# First Step: Understand Payment Mechanisms for Your Product / Service





## The Initial Review

#### What will be reimbursed?

- Professional services
- Facility costs
- Device / product

#### Who are the users?

- Physicians / specialties
- Nurses
- Licensed therapists
- Patients

#### **Medical practice**

- Established, modified or a new practice?
- Clinical protocol / workflow

#### Who will pay?

- Medicare
- Medicaid
- Commercial payers
- IDNs
- Government
- Employers
- Patients

# Where will the product be used?

- Inpatient facility
  - Hospitals
  - Long term care
- Outpatient
  - Hospital-based
  - Ambulatory
  - surgical centers
  - Physician offices/ clinics
- Home



## Step Two: Develop a Roadmap to Reimbursement





### Integrate Coverage Supporting Data Into Clinical Trials Design

# Evidence of improved outcomes, clinical efficiency, and cost effectiveness

Include gathering data comparing study device to existing treatments or technologies

- Well-established performance of the technology.
- Demonstrated clinical outcomes / improvement over the established practice
- Well-defined patient population.
- Economic rationale (preferably short-term benefits).



# Step Three: Integrate 'Reimbursement' into Your Business Plan

Selection of first application / indication / market segment

Product configuration / users' requirements

#### Required clinical data to support regulatory + reimbursement + marketing

Go-to-market strategy

Business and operating models

Identifying appropriate advisors

Required people, Skills & budgets

Regulatory strategy / IFU

Pricing

Strategy



## So, When Should We Start Reviewing Reimbursement?

Company valuation is predicated upon convincing investors and acquirers that the technology will gain adoption.

Adoption requires reimbursement

Gaining reimbursement requires a coherent strategy

# Earlier the better!

Defining the business model and strategy requires an understanding the roadmap to reimbursement





