



Summary of 2022 Medicare Advantage Advance Notice: Upcoming Changes to Star Ratings

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Changes to the Star Rating Program

On October 30th, 2020 CMS released the 2022 Medicare Advantage and Part D Advance Notice Part II which covers proposed changes to the Star Ratings Program. Several of these changes were also covered in prior CMS regulation such as the March and August Interim Final Rules (IFR). See prior Wakely summaries for details on these established program changes¹. This brief discusses the changes that are specific to the Advance Notice Part II.

Additional Detail on Extreme and Uncontrollable Circumstances

The 2022 Advance Notice clarifies a few of the new rules surrounding how COVID-19 would be treated within the current CMS Extreme and Uncontrollable Circumstances Policy (EUC). Due to COVID-19, relatively all MA and PD contracts will qualify for the EUC adjustments finalized in the CY 2020 final rule (published on April 16, 2019). For plans that qualify for disaster adjustments, the adjustment will result in the higher of their measure-level rating from 2021 (either 2018 or 2019 performance) and 2022 (2020 performance) will be used.

In addition to relatively all MA contracts qualifying for EUC status due to COVID, CMS did identify two additional disasters that qualify for EUC status. Several counties in California and Oregon received EUC status due to wildfires. Several counties in Louisiana received EUC status due to Hurricane Laura. CMS did not comment on any additional protections that contracts impacted by these natural disasters would receive.

¹ <https://www.wakely.com/sites/default/files/files/content/cms-star-rating-policy-revisions-response-covid-part-220201005-clean.pdf>

Removed Measures for 2022 Star Ratings

Three measures will be removed from the 2022 Star Ratings (2020 performance period), including: Adult BMI Assessment, Appeals Auto-Forward, and Appeals Upheld

Non-Substantive Changes to Existing Measures for 2022 Star Ratings

CMS will make several non-substantive changes to existing measures within the 2022 Star Ratings. Because these are considered non-substantive changes, CMS will not move these measures to the display page for two years as they would for substantive measure changes. The majority of these measures are HEDIS measures that will be revised to include additional telehealth visits within the measure denominator. The measures impacted include:

- Breast Cancer Screening
- Care for Older Adults
- Colorectal Cancer Screening
- Comprehensive Diabetes Care
- Controlling Blood Pressure
- Controlling High Blood Pressure
- Osteoporosis Management in Women Who Had a Fracture
- Plan All-Cause Readmissions
- Rheumatoid Arthritis Management
- Statin Therapy for Patients with Cardiovascular Disease

Changes to Existing Measures for Future Years

In addition to the non-substantive measure changes for 2022 Star Ratings, CMS proposed several changes to existing measures in future years (beyond 2022 Star Ratings).

Statin Use in Persons with Diabetes (Part D) – Non-Substantive Change to 2023 Star Ratings

Kidney Health Evaluation for Patients with Diabetes (Part C) – CMS is considering adding this measure to the overall Star Rating calculation. This will be a display measure for 2022 Star Ratings.

Controlling Blood Pressure (Part C) – There was a substantial measure change that resulted in CMS moving this measure to the display page for 2020 and 2021 Star Ratings. Since HEDIS data was not collected for 2021 Star Ratings, this measure remain a display measure for 2022 as well.

Plan All-Cause Readmissions (Part C) – Similar to Controlling Blood Pressure, this measure will remain on the display page for 2022.

Potential New Measure Concepts for Future Years

Finally, CMS requests feedback on the introduction of two new measures: Provider Directory Accuracy (Part C) and COVID-19 Vaccination (Part C). If these measures are added to the CMS Star Rating Program, they will need to be included on the display page for a minimum of two years before being included within the Overall Star Rating Calculation.

Please contact Suzanna-Grace Sayre at SuzannaGrace.Sayre@wakely.com, Dani Cronick at Dani.Cronick@wakely.com, or Oliver Smidt at Oliver.Smidt@wakely.com with any questions or to follow up on any of the concepts presented here.

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