

# Cancer Care Disparities in Puerto Rico

### Alexis M. Cruz Chacón, MD FACP

Director of Bone Marrow Transplantation Program, Hospital Auxilio Mutuo
Hematology and Oncology Fellowship Program Director, San Juan City Hospital
Co-Principal Investigator - Malignant Hematology, Puerto Rico NCORP
Adjunct Assistant Professor of Medicine, UPR Medical Sciences Campus
Medical Oncologist, Division of Cancer Medicine, UPR Comprehensive Cancer Center



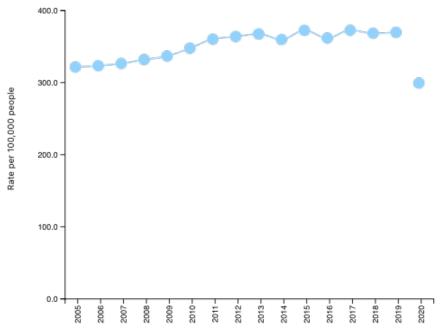




# Incidence: Increasing trend (2005-2020)

Annual Rates of New Cancers, 2005-2020

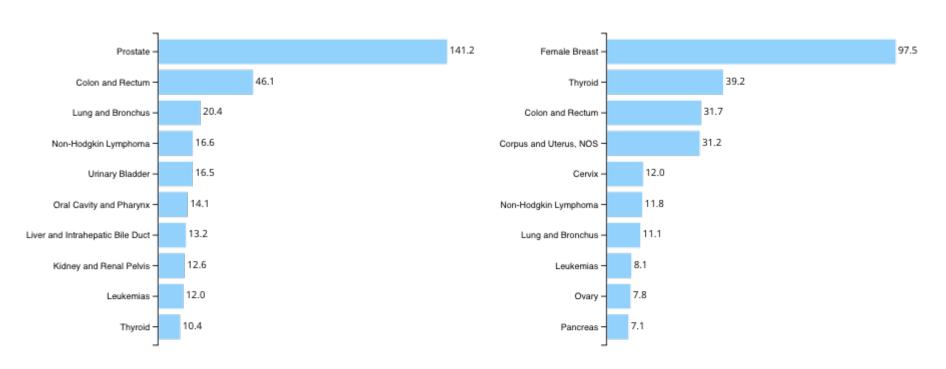
Puerto Rico, All Types of Cancer, Male and Female, All Races and Ethnicities



Source - U.S. Cancer Statistics Working Group. U.S. Cancer Statistics Data Visualizations Tool, based on 2022 submission data (1999-2020): U.S. Department of Health and Human Services, Centers for Disease Control and Prevention and National Cancer Institute; <a href="https://www.cdc.gov/cancer/dataviz">https://www.cdc.gov/cancer/dataviz</a>, released in November 2023.

## Incidence by sex (2016-2020)

### Top 10 Cancers by Rates of New Cancer Cases Puerto Rico, 2016-2020, All Races and Ethnicities

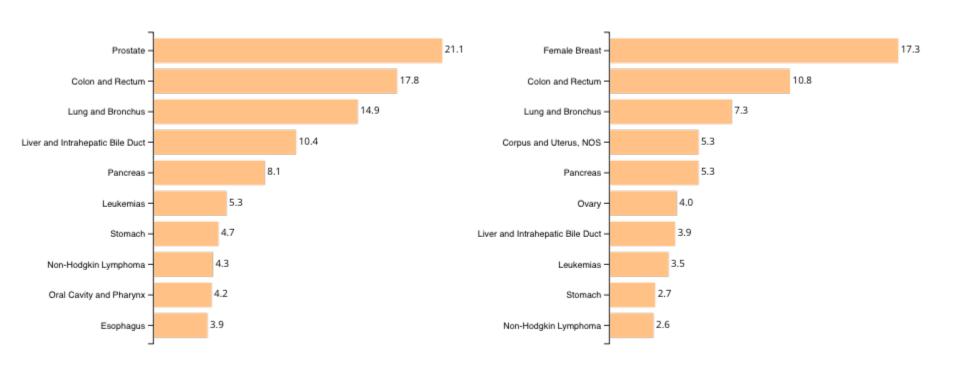


### Rate per 100,000 men

Source - U.S. Cancer Statistics Working Group. U.S. Cancer Statistics Data Visualizations Tool, based on 2022 submission data (1999-2020): U.S. Department of Health and Human Services, Centers for Disease Control and Prevention and National Cancer Institute; <a href="https://www.cdc.gov/cancer/dataviz">https://www.cdc.gov/cancer/dataviz</a>, released in November 2023.

## Cancer Mortality (2016-2020)

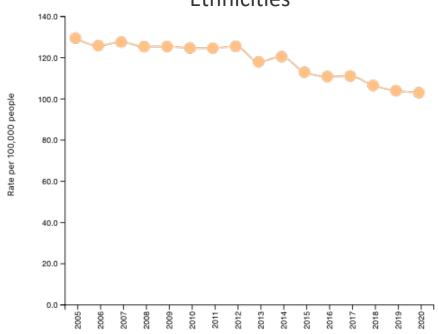
# Top 10 Cancers by Rates of Cancer Deaths Puerto Rico, 2016-2020, All Races and Ethnicities



### Rate per 100,000 men

Source - U.S. Cancer Statistics Working Group. U.S. Cancer Statistics Data Visualizations Tool, based on 2022 submission data (1999-2020): U.S. Department of Health and Human Services, Centers for Disease Control and Prevention and National Cancer Institute; <a href="https://www.cdc.gov/cancer/dataviz">https://www.cdc.gov/cancer/dataviz</a>, released in November 2023.

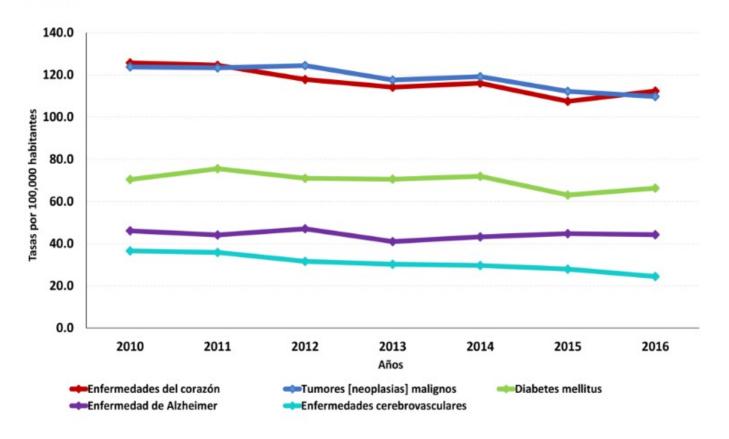
# Annual Rates of Cancer Deaths, 2005-2020 Puerto Rico, All Types of Cancer, Male and Female, All Races and Ethnicities



Source - U.S. Cancer Statistics Working Group. U.S. Cancer Statistics Data Visualizations Tool, based on 2022 submission data (1999-2020): U.S. Department of Health and Human Services, Centers for Disease Control and Prevention and National Cancer Institute; <a href="https://www.cdc.gov/cancer/dataviz">https://www.cdc.gov/cancer/dataviz</a>, released in November 2023.

### Cancer: Leading cause of death in PR (2010-2016)

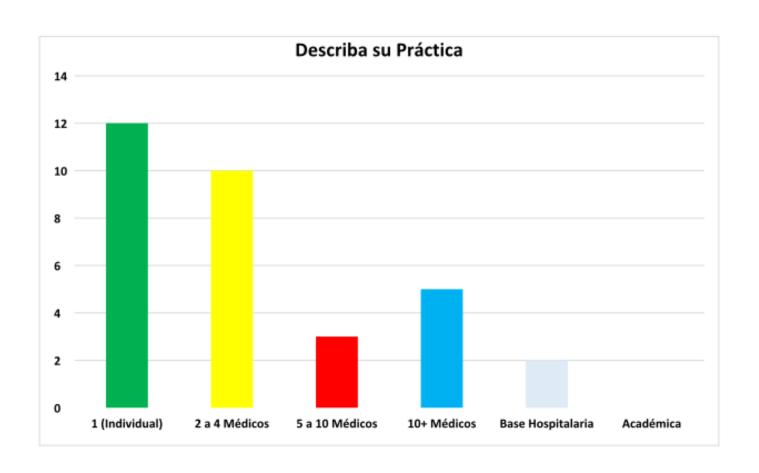
Figura 4.8: Tasas de mortalidad de las primeras cinco causas de muerte: Puerto Rico, 2010 al 2016.



## Medical Oncology in Puerto Rico

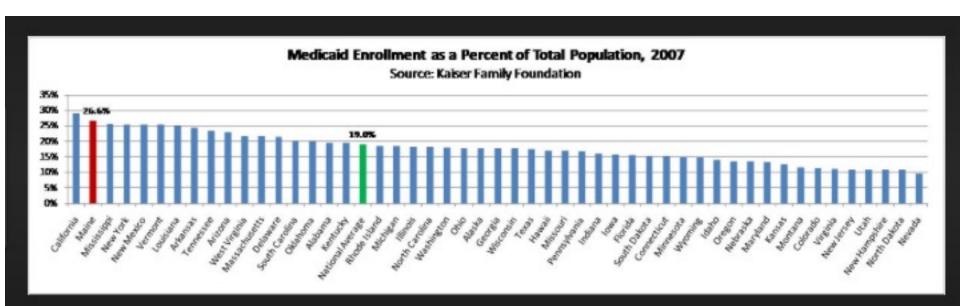
- Two training programs:
  - University of Puerto Rico (2 fellows/year)
  - SJCH/VAH (Average 3 fellows/year)
- 80-100 practicing oncologists
- Most are Community Oncology Practices
  - 1-5 physician groups
  - Physician owned, self-standing clinics
- Few are Hospital-Based
- Well distributed throughout the Island: no patient would have to drive longer than 30-40 minutes to a clinic

# Survey answered by 32 Med Onc (10/2019)

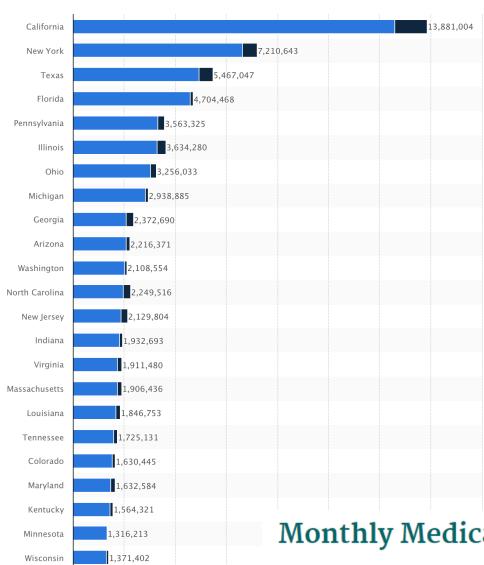


### Health Care in Puerto Rico: Medicaid

- Medicaid a.k.a. "Reforma" or "Mi Salud" now revamped "Plan Vital" accounts over 1.5 million patients (45-47% of the population)
- Mainland US much lower
- Run by ASES, a public corporation which in turn sub-contracts with 4 private insurance companies



### Total number of Medicaid and CHIP enrollees as of May 2022, by state



1,282,993

1,252,640

Missouri South Carolina

State	Total Medicaid
Arkansas	1,014,875
Oklahoma	1,108,063
Connecticut	1,110,728
Missouri	1,218,307
Oregon	1,235,078
Alabama	1,260,607
Minnesota	1,308,442
Puerto Rico	1,449,840
South Carolina	1,493,680
Wisconsin	1,493,798
Kentucky	1,507,591
Maryland	1,520,849
Colorado	1,597,863
Tennessee	1,787,438
Virginia	1,814,910
Indiana	1,930,766
Louisiana	1,954,581
New Jersey	1,969,781
North Dakota	122,902
South Dakota	128,685

### Monthly Medicaid and CHIP Enrollment Data

As of March 2022 Puerto Rico has enrolled 1.5 million individuals in Medicaid and CHIP.

Washington 2,081,732

Maryland (1.5M enrolled/ 6M population) vs Puerto Rico (1.5M enrolled/3.1M population) Expenditures 12.6 billion vs 2.7 billion

# Total Annual Medicaid & CHIP Expenditures by State or Territory

State	Medicaid Services	СНІР	Medicaid Administration	Total
Maryland	\$11,730,186,550	\$384,591,189	\$524,283,991	\$12,639,061,730
Puerto Rico	\$2,452,962,312	\$101,735,027	\$156,284,437	\$2,710,981,776



### **Aseguradoras Contratadas**









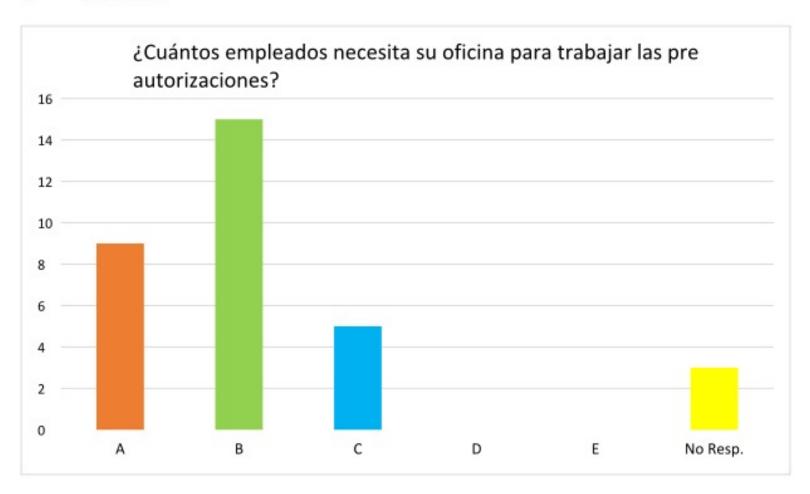


# "Cubierta Especial" and pre-authorization process

- Cancer is an illness for which a "special coverage" allows for patients on active chemotherapy or radiation therapy to get treatment "without a referral" from primary physician
- Even with "Cubierta" most chemotherapy medications need to undergo pre-authorization process
- Process will vary among the 4 administrators
- Fax-based, time-consuming
- Some are approved on a month-by-month basis
- Leads to delay in therapy while increasing administrative burden on small practices with limited personnel

14. ¿Cuántos empleados necesita su oficina para trabajar las pre autorizaciones?

- A. Uno
- B. Dos
- C. Tres
- D. Cuatro
- E. Cinco o más





#### CARTA NORMATIVA 21-0817

17 de agosto de 2021

A: ORGANIZACIONES DE CUIDADO DIRIGIDO (MCOS) CONTRATADOS POR EL PLAN DE SALUD DEL GOBIERNO DE PR (PSG) VITAL; COMPAÑÍAS DE SERVICIOS DE SALUD MENTAL, MÉDICOS PRIMARIOS, GRUPOS MÉDICOS PRIMARIOS (GMP), ADMINISTRADOR DEL BENEFICIO DE FARMACIA (PBM), FARMACIAS Y PROVEEDORES PARTICIPANTES DEL PLAN DE SALUD VITAL

RE: POLÍTICA PARA ASEGURAR EL ACCESO A MEDICAMENTOS, TRATAMIENTO Y PRUEBAS PARA EL DIAGNÓSTICO DE CÁNCER

Se incluye la política, con código de referencia **ASES-OPCAC-2021/P003**, titulada *Política para Asegurar el Acceso a Medicamentos, Tratamiento y Pruebas para el Diagnóstico de Cáncer*, establecida por la Administración de Seguros de Salud (ASES) para el manejo de los pacientes diagnosticados con cáncer. Las medidas presentadas en la política surgen de la necesidad de contemplar la uniformidad del diagnóstico y tratamiento de los pacientes de cáncer en Puerto Rico, y la urgencia que existe en mejorar el cuidado que se le da a esta población.

La política ASES-opcac-2021/P003 entrará en vigor de <u>inmediato</u> y requerimos, a todas las aseguradoras contratadas, que distribuyan y discutan la misma, oportunamente, entre sus grupos médicos y proveedores a la mayor brevedad. Agradecemos su ágil respuesta en el cumplimiento de la política trazada para agilizar los procesos en favor de nuestros beneficiarios pacientes de cáncer.

Cordialmente,

Jorge E. Galva, JD, MHA Director Ejecutivo

Anejo (1)

### PROPOSITO:

Esta política pública establecida por la Administración de Seguros de Salud procura promover el cumplimiento con la Ley Núm. 79 del 1<sup>ro</sup> de agosto de 2020, conocida como Ley Especial para Asegurar el Acceso al Tratamiento y Diagnóstico de los Pacientes de Cáncer en Puerto Rico o "Ley Gabriela Nicole Correa". Esta ley entró en vigor a partir del 1<sup>ro</sup> de noviembre de 2020 y contempla disponer normas uniformes en el diagnóstico y tratamiento para pacientes de cáncer en Puerto Rico. Dicha Ley establece que todo plan médico, individual o grupal, deberá remitir su aprobación o denegación de medicamentos, tratamientos y pruebas diagnósticas dentro de un término de 24-72 horas de recibida la solicitud, o dentro del término de 24 horas, de tratarse de un caso marcado urgente o expedito.

Para obtener los resultados deseados con esta Ley, se establecen unos términos de respuesta de la Aseguradoras, de estricto cumplimiento:

- 24-72 horas a partir del recibo de la documentación completa para emitir su aprobación o
  denegación de medicamentos prescritos tanto por la cubierta de farmacia como por la cubierta
  médica, tratamientos y pruebas diagnósticas enumeradas en las guías de la NCCN o de las
  aprobadas por el FDA, en casos regulares.
- 24 horas a partir de la fecha de recibo de la documentación completa para emitir su aprobación
  o denegación de medicamentos tanto por la cubierta de farmacia como por la cubierta médica,
  tratamientos y pruebas diagnósticas enumeradas en las guías de la NCCN o de las aprobadas
  por el FDA, en casos calificados como urgente o expedito.

ASES atempera esta política a lo dispuesto por Ley en cuanto a que, de no emitirse una determinación por parte de la Aseguradora dentro de los términos establecidos, se entenderá que los medicamentos, tratamientos, y/o pruebas diagnósticas fueron aprobados por la misma. Esta Ley es de aplicación prospectiva y otorga jurisdicción a la Oficina del Procurador del Paciente para intervenir con violaciones a los derechos de los pacientes. Bajo esta Ley se imponen sanciones severas que pueden incluso provocar la cancelación de los contratos de la Aseguradora con la ASES.

### Pre-Autorizaciones y Tratamiento Farmacológico

Todas las Aseguradoras compartirán los protocolos o requisitos de Pre-Autorizaciones a través de las respectivas páginas electrónicas o las plataformas que tengan disponibles para sus proveedores contratados. Las aseguradoras deben de enviar un comunicado a sus proveedores contratados con copia a la ASES para orientarlos sobre el acceso a la plataforma del MCO/aseguradora. Tanto ASES como el PBM debe de tener acceso a esta plataforma provista por las aseguradoras (ASES debe de tener acceso a los protocolos y los requerimientos de Pre-autorizaciones). Además, las Aseguradoras deben mantener al día y accesibles los requisitos de Pre-Autorización, asistir a los proveedores en acelerar el proceso de evaluación y evitar denegaciones causadas por falta de información o por no someter los documentos requeridos.

La aprobación de la solicitud de Pre-Autorización puede ser autorizada por un funcionario designado por la Aseguradora. No obstante, en el caso de las denegaciones de servicios, manejo o tratamiento de cáncer, la denegación será realizada por un médico con licencia activa para el ejercicio de la medicina en Puerto Rico. Igualmente, dicha denegación debe de ser firmada por el profesional que emitió la determinación. La documentación que será sometida por el médico que emitió la denegación deber ser el número de la licencia y el Identificador de proveedor nacional (NPI) por sus siglas en ingles.

### Medicare in Puerto Rico

- Over 500,000 lives = 20% population
- 75-90% patients are under a Medicare HMO (Medicare Advantage)
- Nearly 100% dual-eligible are under a MA plan
  - MMM/PMC (267,000 members)
  - Triple SSS
  - MCS Classicare
  - Humana

# The Weekly Journal POWERED BY NOTICE TO THE WORLD BY NOTICE TO THE W

### PUERTO RICO AND THE CARIBBEAN

TOP STORIES

BUSINESS

MARKETS

**BUSINESS GALLERY** 

LIFESTYLE

OPINION

ONLINE FEATURES

MORE...

FEATURED

# Anthem to Acquire MMM Holdings in Puerto Rico

Move expands insurer's presence in Medicare and Medicaid

Newsroom, The Weekly Journal Feb 2, 2021 Updated Feb 2, 2021 Q

MMM is Puerto Rico's largest MA plan and one of the fastest-growing vertically integrated healthcare organizations in the United States. With more than 267,000 MA members and over 305,000 Medicaid members, MMM represents the ninth-largest MA plan in the country and second-largest Medicaid plan on the island of Puerto Rico.

# Modern Healthcare

# Puerto Rico: The 'canary in the coal mine' for Medicare Advantage growth

MAYA GOLDMAN



Puerto Rico's major Medicare Advantage players have recently been acquired by insurance companies or private equity groups based in the mainland U.S., which may offer some more immediate solutions to problems created by low benchmarks and payment.

Elevance purchased MMM, GuideWell acquired Triple-S—making it part of the same parent company as Florida Blue, which runs Medicare Advantage plans in that state—and private equity company Kinderhook Industries acquired MCS.

"This relationship may help us have different conversations with providers in Florida. Maybe they want to provide care in Puerto Rico," said Camille Harrison, executive vice president of Medicare and chief innovation and experience officer at GuideWell. "There's so many different ways that we can think about this opportunity.

"But the biggest is us sharing from our perspective and Triple-S's perspective why it's important to level the playing field in terms of reimbursement," she said. "If they're doing well with what they have, imagine if they had equitable reimbursement and compensation."

Puerto Rico insurance companies and GuideWell also point to the leverage that large states-based healthcare companies can bring to lobbying efforts. GuideWell supports the policy goals of the González-Colón bill and believes it's a step in the right direction for Puerto Rico's Medicare Advantage program but needs to more fully review the legislation before taking an official position, a spokesperson said.

Ultimately, Puerto Rico's Medicare Advantage insurers believe they can lead the way for companies all over the country—both by asking for policy changes and showing how to manage if those changes aren't approved.

## Medicare Advantage

### Medicare Challenges

Medicare has long been underfunded in Puerto Rico. Americans on the Island pay the same Medicare payroll tax as mainland citizens but receive the lowest level of federal Medicare spending in the country. Federal underfunding of Medicare Advantage (MA) in Puerto Rico has contributed to a health care crisis in the wake of the COVID-19 pandemic.

While more than 80% of Puerto Rico's Medicare enrollees elect benefits through MA plans, only 30% of mainland enrollees do. And yet, MA in Puerto Rico is:

- 41% below the U.S. average in federal benchmark funding
- · 37% below the lowest state's federal benchmark funding
- 23% below the U.S. Virgin Islands' federal benchmark funding

This lack of funding has strained an already broken system. As a result of this chronic underfunding, thousands of physicians have fled the island and essential investments in diagnostic and treatment equipment have had to be deferred.

## "Medicare parity"

- Increase in 2017 and 2018 Medicare rates are a result of revised GPCI
- These increased rates are representative of the TRUE cost of an Oncology practice In Puerto Rico
- Unfortunately applies to only 10-20% of all Medicare patients
- Part B drugs are not adjusted based on locality (shipping, etc not taken into account)
- Small practices with less "purchasing power" for competitive drug pricing results in high percentage of underwater drugs
- Sequestration applied to drug reimbursement
- Will physicians need to await "Medicare Advantage Parity" to see fair reimbursement?

# Medicare Rates 2016 vs 2018

	99213	99213	96413	96413
	(2016)	(2018)	(2016)	(2018)
Puerto Rico	\$ 60.96	\$ 74.32 (+20 %)	\$ 97.95	\$ 145.59 (+ 30%)

# Triple SSS Advantage: Rates based on Medicare 2018

### Triple-S Advantage aumentará la tarifa a especialistas

Sincomillas.com/triple-s-advantage-aumentara-la-tarifa-a-especialistas/

September 18, 2018

#### Por redacción de Sin Comillas

Desde el 1 de noviembre de 2018, Triple-S Advantage incrementará su tarifa por servicios a los médicos especialistas que pertenecen a su red de proveedores de Triple-S Advantage al aplicar el "Medicare Fee Schedule 2018".

"Somos la compañía en Puerto Rico que adopta de manera más abarcadora y formal el Medicare Fee Schedule 2018 como base para el pago de los servicios a su red de especialistas para sus productos Medicare Advantage. Esto es parte de una estrategia más amplia para contribuir al desarrollo y retención de la clase médica del país, que incluye mantener abierta nuestra red de proveedores para permitir el ingreso de médicos nuevos, y esfuerzos colaborativos con las escuelas de medicina locales para ofrecer cursos a sus estudiantes sobre aspectos regulatorios y operacionales de su industria", expresó José Novoa, cardiólogo y principal oficial médico de Triple-S.

El Medicare Fee Schedule es un tarifario que aplica al Medicare tradicional, pero no a los planes Medicare Advantage. Esto se debe a que las tarifas que se pagan en Medicare Advantage están atadas al diseño de los productos, a su calificación de estrellas y a las primas que reciben las compañías a base de esa calificación.

"En Triple-S estamos enfocados en trabajar de la mano de nuestros médicos para ofrecer un servicio de calidad a nuestros afiliados", expresó el doctor Novoa. El galeno señaló que el nuevo tarifario se usará para todos los especialistas y subespecialistas de la red Triple-S Advantage.

# Other Medicare Advantage Plans' Rates are based on Medicare 2016 rates

	MA	Medicare	MA	Medicare
	99213	99213 (2022)	96413	96413 (2022)
Puerto Rico	\$ 60.96 (-35%)	\$ 92.35	\$ 97.95 (-30%)	\$ 141.03

## Medicare Advantage

- What business owner would want their rates cut by 30-35%?
- Rates for 2022 on most MA remain at 2016 Medicare FFS
- Difficult to lobby on an individual level

# Other issues: Medications

## Drug reimbursement: Medicaid and Privates

- Unclear as to where information is obtained
- Medicare ASP drug prices should NOT be the standard for local plans

### **Medicare Part B Drug Average Sales Price**

### Manufacturer reporting of Average Sales Price (ASP) data

A manufacturer's ASP must be calculated by the manufacturer every calendar quarter and submitted to CMS within 30 days of the close of the quarter. Each report also must be certified by one of the following: the manufacturer's Chief Executive Officer (CEO); the manufacturer's Chief Financial Officer (CFO); or an individual who has delegated authority to sign for, and who reports directly to, the manufacturer's CEO or CFO.

For all data submissions made on or after January 1, 2012 (that is, submissions of 4Q2011 and subsequent data), manufacturers must use the 2012 revision of the Microsoft Excel template entitled "ASP Data Form (Addendum A)." Revisions to the Addendum A template include a validation macro, changes in the layout of the data fields, and new data fields. Additional information about the use of the revised Addendum A template is available in the Average Sale Price (ASP) Data Collection CM Validation Macro User Guide. Both the revised Addendum A template and the User Guide are available in the Downloads section below.

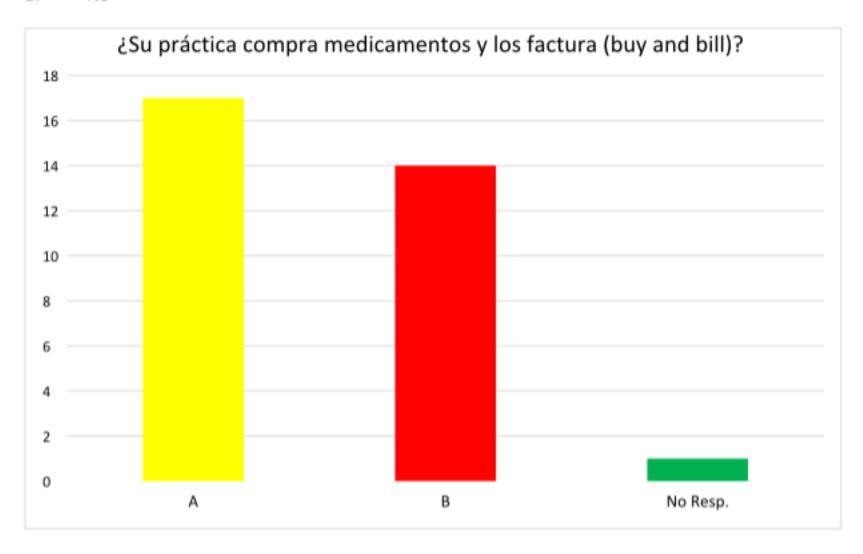
## Use of Specialty Pharmacy

- Most are in Metro-San Juan Area
- Limited access for patient-pharmacy interaction
- Increases administrative burden to physician's office (which is NOT billable)
- Pre-authorization process tedious
- Poor communication between pharmacy and insurance company
- Increasing steps results in delay of therapy
- However, SP still necessary with increasing drug prices

8. ¿Su práctica compra medicamentos y los factura (buy and bill)?

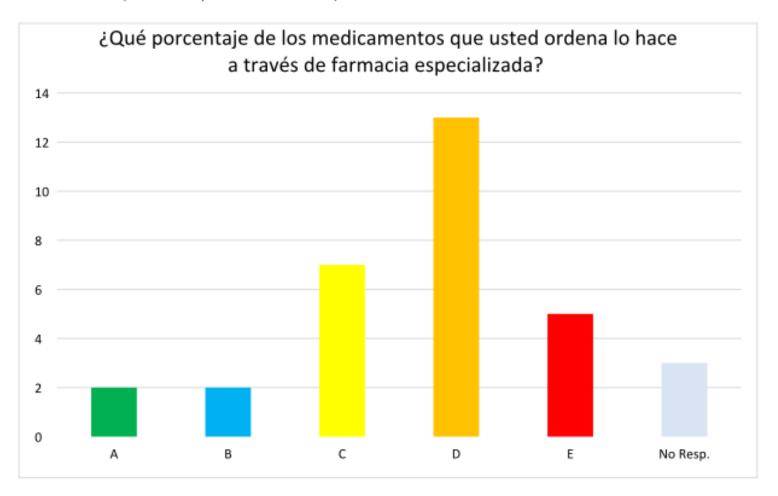
A. Si

B. No



9. ¿Qué porcentaje de los medicamentos que usted ordena lo hace a través de farmacia especializada?

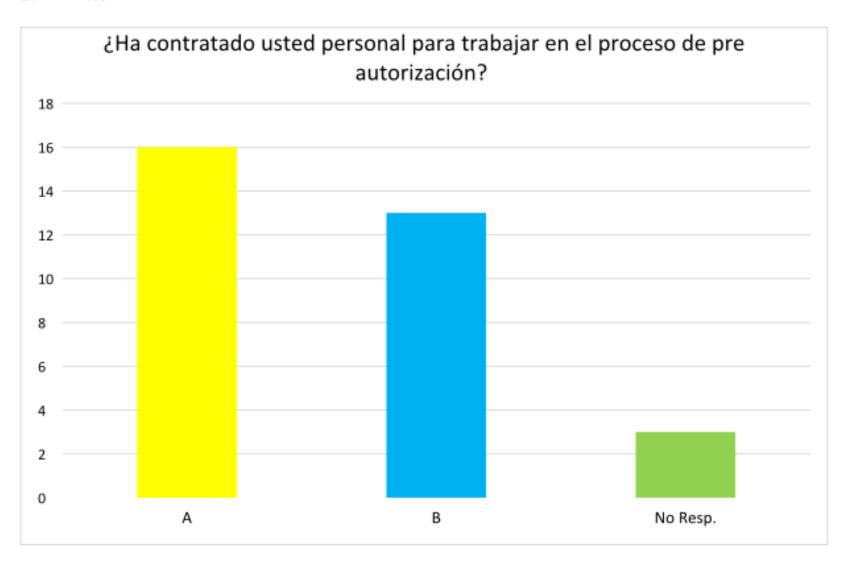
- A. Menos del 25%
- B. 26-50%
- C. 51-74%
- D. >75%
- E. 100% (Yo no compro medicamentos)



11. ¿Ha contratado usted personal para trabajar en el proceso de pre autorización?

A. Si

B. No

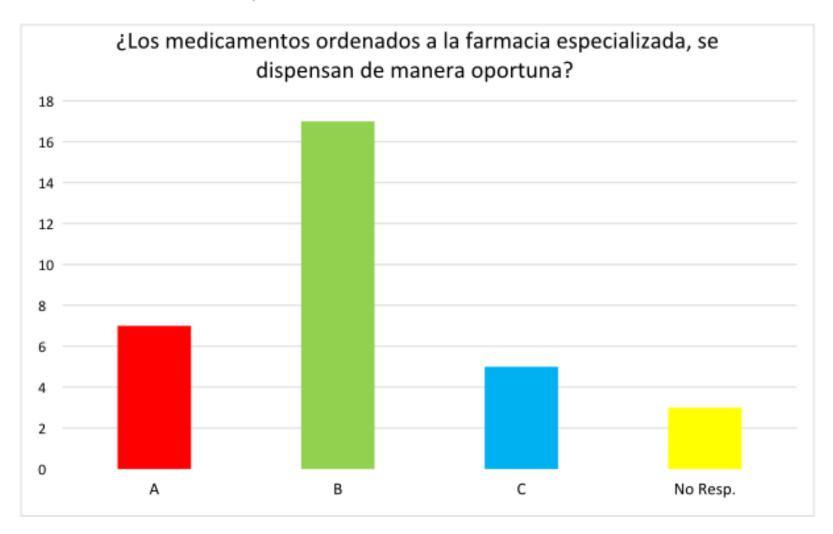


15. ¿Cuántos empleados necesita su oficina para trabajar con los asuntos de farmacia especializada?

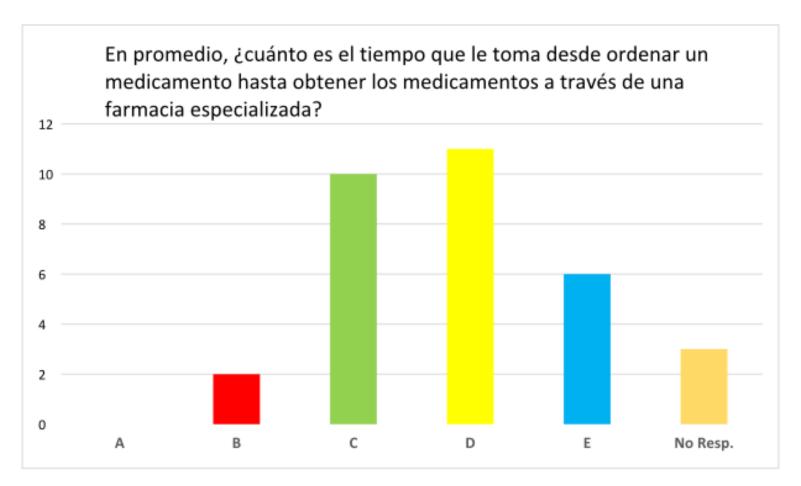
- A. Uno
- B. Dos
- C. Tres
- D. Cuatro
- E. Cinco o más



- 10. ¿Los medicamentos ordenados a la farmacia especializada, se dispensan de manera oportuna?
- Menos del 25% del tiempo
- B. 50 % del tiempo
- C. Más del 75% del tiempo



- 13. En promedio, ¿cuánto es el tiempo que le toma desde ordenar un medicamento hasta obtener los medicamentos a través de una farmacia especializada?
- A. > Menos de 24 horas
- B. 1-3 días
- C. 3-7 días
- D. 8-14 días
- E. > 14 días



### **AHOMPR:**

- Participación en:
  - Participacion Reunión Junta Asesora Oncologia
  - Comite de Tarifación y Contratación Oficina Comisionado de Seguros PR
  - Comité Farmacia ASES
  - Junta de Procuraduría del Paciente
  - Junta Sociedad Americana Contra el Cancer
  - Coalición de Control de Cancer de Puerto Rico

