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A Standardized Approach to Collecting Non-Claims Payment Data

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As the movement toward value-based care picks up pace, spending paid outside the fee-for-service system is increasing. States interested in measuring total healthcare spending, primary care and behavioral health investment, and adoption of alternative payment models are increasingly looking for ways to capture this non-claims spending. For many, identifying a standardized national approach has been an important but elusive goal.

In 2022, as part of the initiative to develop submission standards, APCD-Council and NAHDO focused on developing a standard for collecting non-claims payments (NCP) data not captured by the All-Payer Claims Database (APCD) Common Data Layout (APCD-CDL™). This effort aimed to provide a standardized data collection tool, enabling comparisons of NCP data across states and programs while reducing the burden of data submission. The NCP Data Layout™ seeks to improve efficiency, reduce administrative costs, and improve accuracy.

To develop the NCP Data Layout™, the APCD-Council and NAHDO convened a workgroup from 2022 through early 2024, which focused on collecting use cases, reviewing existing state layouts, gathering lessons learned, along with evaluating existing payment categories on NCPs to support state priorities and reporting needs. The multi-stakeholder workgroup, comprised of state partners, payers, vendors, and others, provided input on the data collection specifications, including the number of files needed to collect the data, the level at which data is summarized, and the data elements needed to be collected. The outcome is the NCP Data Layout™, which includes three files for submission: 1) an annual file collecting total fee-for-service and non-claims payment amounts aggregated at a provider organization level, 2) a capitated file that captures payments that can be attributed to an individual, and 3) a pharmacy rebate file that summarizes rebates at the NDC level.

As part of this work the group evaluated various options for payment categories that would support the level of detail needed for analysis and reporting. Stakeholders coalesced around the Expanded Non-Claims Payment Framework (Expanded Framework) developed by Freedman HealthCare for the California Department of Health Access and Information to support use cases across the state agency. The Expanded Framework provides descriptive categories and subcategories of NCPs that enable an understanding of both the intent of the NCP and the level of financial risk to the provider receiving the NCP. It also crosswalks to the Health Care Payment Learning and Action Network

(HCP-LAN) framework. And, California has recently worked with Freedman HealthCare to develop an approach to identify primary care spending using the Expanded Framework. This ability to fulfill multiple purposes – measuring growth in total non-claims spending, monitoring primary care spending, and assessing alternative payment adoption – makes the Expanded Framework ideal for states seeking a single approach across many use cases.

At NAHDO's August 2023 Annual Meeting held in Boston attendees from around the nation reviewed both the proposed NCP layouts and were introduced to the Expanded Framework. The NCP workgroup reviewed the feedback received from stakeholders at the Boston meeting and incorporated the feedback for a final draft that was reviewed by stakeholders in February 2024 before the NCP Data Layout™ was published in April 2024.