



## FREQUENTLY ASKED QUESTIONS

### **TOWER HEALTH PROVIDERS**

#### ***What is Tower Health Providers (THP)? Who participates in it?***

Incorporated in 2012 as an LLC, Tower Health Providers (THP) is one of the oldest and largest Clinically Integrated organizations in the region. THP is a broad, multi-specialty physician network uniquely positioned to support value-based and shared savings arrangements for providers, payers, employers, and patients.

#### ***Is THP an insurance company?***

THP does not hold an insurance license with the state of Pennsylvania and therefore cannot and does not sell insurance products to the general public. THP is incorporated as an LLC and is structured to negotiate non-risk bearing, value-based and shared savings contracts, which includes population health management programs, on behalf of its physician members.

#### ***Who governs THP?***

THP physician members lead and govern program operations and physician committees provide leadership in population health, IT, quality, and contracting. In addition, THP physicians strive to extend the Quadruple Aim of Care by incorporating physician wellness and satisfaction.

### **CLINICAL INTEGRATION**

#### ***What is clinical integration?***

Clinical integration is a term used to describe certain types of collaborations among employed and independent health care providers to improve quality and contain costs. The 1996 joint FTC/Department of Justice Statements of Anti-trust Enforcement Policy in Health Care expressly recognizes the relevance of such integration to the anti-trust analysis of health care provider networks that seek to collectively negotiate contracts with payers on behalf of their members

#### ***Why is clinical integration important in today's healthcare environment?***

Clinically integrated networks focus on the continuum of care framework to facilitate delivery of coordinated, efficient care for patients. This leads to better outcomes and management of chronic disease for overall improved population health while reducing healthcare costs. Early adoption of a clinically integrated network gives physicians a competitive edge when reimbursement moves from fee-for-service to pay-for-performance.

#### ***How does clinical integration operate?***

Tower Health Providers' physician members focus on enhancing best practices, increasing collaboration, decreasing outmigration, improving practice efficiencies, exchanging clinical data, improving case management, and promoting payer-provider relationships. Physician members set their own performance objectives and accountable quality standards, regularly review the progress of clinical initiatives, and develop organizational objectives and plans for infrastructure support.

## **MEMBERSHIP IN TOWER HEALTH PROVIDERS**

### ***Why should I become a member of THP?***

With fragmented healthcare and costs continuing to rise, participation in clinical integration offers physicians an approach to coordinated care resulting in better outcomes, lower costs, and higher patient satisfaction. Clinically integrated, high-value networks are attractive to patients for quality assurance in their care and to payers for efficiencies to deliver on value-based care contracts. There is no fee to become a member of THP.

### ***What are the membership requirements of participation in THP?***

Physician members are required to meet all criteria for participation as listed in the agreement. These include: maintaining licensure for practicing medicine, appropriate credentialing with payers, participating in THP policies and procedures, sharing clinical and metrics data, partaking in committee work, and actively engaging in the CI program. Physicians also agree to increase collaboration efforts with colleagues and help strengthen and maintain network connections for referrals and best practices.

### ***How does a THP membership benefit me?***

For physician members, there are financial incentive rewards, preferred payer contracts, network recognition, referral opportunities, greater collaboration with colleagues, enhanced support for office efficiencies, a focus on optimum work/life balance, and additional benefits through a Master Services Organization.

### ***Will my current fee schedules be affected?***

No, your current fee schedules remain unaffected. THP does not negotiated fee schedules.

### ***How does Tower Health Providers support physicians?***

Tower Health Providers physicians have access to clinical and technological tools for providing outstanding patient care. These include standardized best practices to streamline care and improve overall population health, including the ability to monitor patient progress and manage chronic diseases through data collection and analysis.

### ***If I belong to THP, can I still join another clinically integrated organization?***

THP's physician network is non-exclusive. Physician members may keep their existing arrangements with other CINs or payers and may be part of multiple networks and organizations.

### ***Where else can I find information to answer my questions?***

THP has pledged transparency to our membership. Answers to questions can be found in this document; visit our website at [www.towerhealth.org/thp](http://www.towerhealth.org/thp); or contact us directly. We have a dedicated provider relations team ready to support you and your practice.

## **QUALITY IMPROVEMENT AND INFORMATION TECHNOLOGY**

### ***What are the metrics for THP and why are they important?***

Selecting, defining, and collecting metrics from each participating physician in the THP network is an FTC requirement. Data aggregation and assessment of clinical performance is the foundation of shared savings contracts. The metrics for THP physicians are carefully selected by physician members and vetted through THP's physician-led Quality committee. Metrics lists are provided to you during onboarding. Physicians and their offices may also contact the THP provider relations team for more information.

### ***What type of data is monitored and how is it collected?***

Tower Health Providers collects standard clinical data extracts from each physician's EMR, practice management system, registry, or other electronic system. To streamline this, THP utilizes electronic interfaces from the EMR or system to our secure, cloud-based data management platform. Data collection and management is overseen by THP's physician members and is used to create quality metrics reports, support population health, and manage value-based contracts. Please refer to your participation agreement for requirements on data sharing.

## **PATIENT CARE**

### ***How do patients benefit from THP?***

Patients who receive care from a physician member of THP enjoy high-quality care, improved outcomes, more healthcare options, greater access to care, and coordination of their healthcare needs. This all leads to getting the right care, at the right time, in the right setting. THP physicians and practices are supported in providing patient-centric care across the continuum.

### ***How can patients find an THP physician?***

Patients can search for a member physician by going to [www.towerhealth.org](http://www.towerhealth.org) and use the Find a Provider search bar. For employer-specific plans, patients can find physicians through their insurance's website or other material provided to them upon enrollment.

## **CONTRACTING**

### ***Do member physicians participate in all contracts negotiated by Tower Health Providers?***

It depends. Negotiated contracts must include economic benefit to all of our Tower Health Providers participating physicians. Contract inclusion will vary as payer programs and employers may utilize subsets of the network (i.e., PCP-only) for shared savings or value-based arrangements. In addition, physicians already included in certain value-based contracts outside of THP may be excluded from similar contracts, as per their contract agreements.

### ***How will this clinically integrated organization benefit employers or payers?***

THP is structured to facilitate ongoing collaboration between physicians and other care teams for more efficient, streamlined care with greater cost control, saving employers or payers money on the cost of care, and rewarding physicians for participating in that care. Coupled with proactive preventative care and chronic disease management programs, the care THP physicians provide to patients help keep healthcare costs in check and improve patient satisfaction.

### ***How do value-based contracts impact me?***

Physicians in a high-value network strive to meet certain clinical metric and financial thresholds related to improving patient care while decreasing the cost of that care. Physicians have the potential to share in a percentage of those cost savings and be monetarily rewarded via shared savings and quality incentives for reaching contract goals.

## **FEDERAL TRADE COMMISSION**

### ***Is contracting by a large number of physicians a violation of the anti-trust laws?***

THP presented its organizational plan to the Federal Trade Commission (FTC) in January 2014. Since then, THP has proceeded in operating under their safe-harbor guidelines. This allows THP to meet with potential employers and commercial payers to present our programs and contract on behalf of our physician network for shared savings arrangements.

***What does the FTC require of the individual physician members of THP?***

The FTC requires that each individual physician in THP submit quality metrics as proof of improvement in patient care, develop cost containment strategies as part of a large network, and participate in programs to improve clinical effectiveness and patient satisfaction. Physicians also must participate in continuing education programs to improve their knowledge of clinical integration initiatives.

***Would I ever be directly contacted by an FTC Representative?***

**Potentially.** The FTC has made unannounced visits to physician offices who participate in a CIN. The visit is used to determine how the physician is improving the quality of care provided to patient populations. If you are contacted by the FTC, please notify us and we can provide additional guidance and support related to their visit.

***How can I learn more about the FTC?***

Please visit the Federal Trade Commission website at [www.ftc.gov](http://www.ftc.gov).

**CONTACT US**

For further questions, please contact us at 610-743-6043 or email [thp@towerhealth.org](mailto:thp@towerhealth.org).