## Reinsurance as a tool to mitigate risk in an alternative payment model

Modeling the impact of reinsurance on provider risk

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## Section 1: Introduction

Alternative payment models (APMs) are approaches to paying for medical services that tie payment to the quality or value of the care provided to patients as opposed to the quantity. They represent 'alternatives' to traditional fee-forservice reimbursement, which pays providers for each service rendered. Oncology APM concepts have been growing in popularity in recent years. Several factors are driving this popularity, including the high cost of treating oncology patients as well as the desire to better align incentives across stakeholders and encourage value for patients and purchasers. Discussion of how to structure APMs most effectively within oncology has occurred at a broad level, including between private payers and providers, among multi-stakeholder workgroups, and on a national stage due to the Oncology Care Model (OCM) of the Centers for Medicare and Medicaid Services (CMS), a voluntary national APM for oncologists that includes Medicare fee-for-service patients. Despite great progress in oncology APM development, providers have expressed concern that the degree of insurance risk may discourage broad APM adoption, but that better insight into the risk and tools to manage it will help oncology APMs to gain momentum.

Many APMs have built-in risk mitigation features such as outlier provisions or stop-loss limits. However, they may not offer adequate protection for small and midsize physician groups, which may be worried about even moderate swings in revenue from year to year. Variability in costs from year to year and low, potentially inaccurate target prices also contribute to the concerns.

The body of this report illustrates the impact of various types of reinsurance ${ }^{1}$ on the risk posed to provider groups by oncology APMs similar in structure to the OCM. Both the risk inherent in an APM and the protection provided by reinsurance will vary based on the terms of the APM. To illustrate these differences in risk and protection, Appendix A includes tables that show the impact of reinsurance on a broader set of APM parameters.

It is important to note that the data underlying this report is based on Medicare's fee-for-service (FFS) payment structure. We would expect APMs based on commercial payment structures to exhibit more variation than is shown in this report because commercial payment rates may exhibit greater variation across providers than Medicare payment rates.

## SUMMARY OF RESULTS

To demonstrate the risk a group might expect under a bundled payment methodology similar to OCM, we used actual Medicare oncology experience to generate 10,000 simulations (each one being the equivalent of a performance year) under this APM. This was done for several combinations of underlying parameters, such as physician group size and hospital affiliation, risk "track" (i.e., one-sided vs. two-sided risk with various stop-loss/gain limits), and the presence of bias in the target price. The table in Figure 1 shows the results for several of these parameter sets. For the parameter sets underlying Figure 1, we found a small physician group's episode spending is expected to exceed target prices by at least $5 \%$ more than $10 \%$ of the time. For large physician groups, the table shows only a $1 \%$ chance of spending exceeding targets by $5 \%$ or more. As noted in the table title ("No Target Bias"), these losses would occur even if the physician group were capable of achieving the overall medical cost ${ }^{2}$ savings required by the APM calculation. ${ }^{3}$

[^0]FIGURE 1: APM RESULTS: TWO-SIDED RISK MODEL, WITHOUT REINSURANCE, NO TARGET BIAS
Hospital Affiliated Non-Hospital Affiliated

| Outcome Percentile | Small Practice | Large Practice | Small Practice | Large Practice |
| :--- | :---: | :---: | :---: | :---: |
| $25^{\text {th }}$ | $3.9 \%$ | $1.5 \%$ | $4.0 \%$ | $1.6 \%$ |
| $50^{\text {th }}$ | $0.2 \%$ | $0.0 \%$ | $0.2 \%$ | $0.1 \%$ |
| $75^{\text {th }}$ | $(3.2 \%)$ | $(1.4 \%)$ | $(3.6 \%)$ | $(1.5 \%)$ |
| $90^{\text {th }}$ | $(6.4 \%)$ | $(2.8 \%)$ | $(6.7 \%)$ | $(2.8 \%)$ |
| $95^{\text {th }}$ | $(8.0 \%)$ | $(3.6 \%)$ | $(8.4 \%)$ | $(3.6 \%)$ |
| $97^{\text {th }}$ | $(9.1 \%)$ | $(4.1 \%)$ | $(9.6 \%)$ | $(4.2 \%)$ |
| $98^{\text {th }}$ | $(9.9 \%)$ | $(4.6 \%)$ | $(10.4 \%)$ | $(4.6 \%)$ |
| $99^{\text {th }}$ | $(11.0 \%)$ | $(5.5 \%)$ | $(11.8 \%)$ | $(5.2 \%)$ |
| Average | $0.4 \%$ | $0.0 \%$ | $0.3 \%$ | $0.1 \%$ |

Results are the gain / (loss) presented as a percentage of Medicare FFS costs incurred.

Based on these simulated outcomes, we estimated the cost and risk mitigation impact of three common types of reinsurance: specific, aggregating specific, and aggregate. The impact of reinsurance will vary based on the parameters of coverage purchased. For simplicity, we selected a single set of coverage parameters for each type of reinsurance. The table in Figure 2 shows the final results from the simulations underlying Figure 1, but adjusted for the impact of reinsurance. For example, this table suggests that the probability of significant losses for a small, non-hospital-based practice can be reduced substantially depending upon the type of reinsurance purchased. The net cost of this protection would vary by the type of reinsurance and with the parameters selected, but based on the parameters used in our analysis the net cost of reinsurance was $1 \%$ to $3 \%$ of episode spending.

FIGURE 2: APM RESULTS: TWO-SIDED RISK MODEL, WITH REINSURANCE

|  | Small Practice, By Reinsurance Type |  |  | Large Practice, By Reinsurance Type |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Outcome Percentile | None | Specific | Agg. Spec. | Aggregate | None | Specific | Agg. Spec. | Aggregate |
| 25th | $4.0 \%$ | $(0.0 \%)$ | $(0.8 \%)$ | $2.4 \%$ | $1.6 \%$ | $(1.7 \%)$ | $(1.5 \%)$ | $1.6 \%$ |
| 50 th | $0.2 \%$ | $(2.8 \%)$ | $(2.5 \%)$ | $(1.3 \%)$ | $0.1 \%$ | $(2.9 \%)$ | $(2.1 \%)$ | $0.0 \%$ |
| 75th | $(3.6 \%)$ | $(5.6 \%)$ | $(4.0 \%)$ | $(4.9 \%)$ | $(1.5 \%)$ | $(4.0 \%)$ | $(2.7 \%)$ | $(1.5 \%)$ |
| 90 th | $(6.7 \%)$ | $(8.0 \%)$ | $(5.2 \%)$ | $(6.1 \%)$ | $(2.8 \%)$ | $(5.0 \%)$ | $(3.3 \%)$ | $(2.8 \%)$ |
| 95th | $(8.4 \%)$ | $(9.3 \%)$ | $(5.9 \%)$ | $(6.2 \%)$ | $(3.6 \%)$ | $(5.5 \%)$ | $(3.6 \%)$ | $(3.7 \%)$ |
| 97 th | $(9.6 \%)$ | $(10.2 \%)$ | $(6.4 \%)$ | $(6.2 \%)$ | $(4.2 \%)$ | $(5.9 \%)$ | $(3.7 \%)$ | $(4.2 \%)$ |
| 98 th | $(10.4 \%)$ | $(10.6 \%)$ | $(6.7 \%)$ | $(6.3 \%)$ | $(4.6 \%)$ | $(6.2 \%)$ | $(3.9 \%)$ | $(4.6 \%)$ |
| 99th | $(11.8 \%)$ | $(11.6 \%)$ | $(7.2 \%)$ | $(6.3 \%)$ | $(5.2 \%)$ | $(6.6 \%)$ | $(4.1 \%)$ | $(4.8 \%)$ |
| Average | $0.3 \%$ | $(2.7 \%)$ | $(2.2 \%)$ | $(0.6 \%)$ | $0.1 \%$ | $(2.8 \%)$ | $(2.1 \%)$ | $0.1 \%$ |

Results are the gain / (loss) presented as a percentage of Medicare FFS costs incurred. This table reflects the non-hospital-affiliated scenario.

While Figures 1 and 2 above illustrate results from a specific set of underlying contract parameters similar to the OCM, we believe our complete analysis shows that if an APM as a standalone payment mechanism carries more risk than a physician group wishes to accept, appropriate forms of reinsurance can offer significant protection. This protection does come at a cost. However, if the physician group is willing to accept that cost, a bundled payment that creates otherwise unacceptable risk can become a viable concept for more groups.

Appendix A includes similar results from 48 different APM scenarios. These scenarios are described in more detail in the body of the report.

Key takeaways from this report include

- In the absence of any reinsurance, large physician groups will tend to experience smaller losses as a percentage of total episode spending in poor performing years than smaller practices.
- Aggregate coverage will provide more dependable coverage against the highest possible losses given that, by definition, it limits total losses.
- Specific coverage alone does not provide the desired protection against large overall losses, especially when the APM methodology incorporates winsorization ${ }^{4}$.
- Aggregating specific coverage can be more effective than specific coverage in limiting the loss at the highest percentile outcomes to a lower cost, especially for small practices.
- Aggregate reinsurance can provide protection against significant losses even when target rates are understated. The same is not true for specific or aggregating specific coverage.
- Reinsurance coverage can offer risk protection in the event of a loss. However, this protection comes at a cost that often reduces gains in good performing years.
- Groups that are only concerned with mitigating losses may prefer an aggregate policy, which provides no reimbursements in "good" years, but offers a reduced cost of reinsurance as a result.
- No type of reinsurance will completely prevent understated target rates from reducing expected gains (or increasing expected losses) to providers.


## CAVEATS AND LIMITATIONS

This report was commissioned by Amgen. The findings reflect the research of the authors; Milliman does not intend to endorse any product or organization. If this report is reproduced, we ask that it be reproduced in its entirety, as pieces taken out of context can be misleading.

The model was developed based on our experience in working with APMs and reinsurance. Actual experience will vary from our models for many reasons, including differences in population health status, medical and prescription drug reimbursement levels, and the delivery of healthcare and prescription drug services, as well as other nonrandom and random factors.

The model as provided was intended to provide illustrations of potential reinsurance coverages for the purpose of understanding the costs and benefits of these coverages. There have been simplifying assumptions made that result in a model with less precision than might be desirable for either purchasers or providers of reinsurance coverage. These are described in the section "OCM Assumptions."

In performing our analysis, we relied on data and OCM program information provided by CMS. We have not audited or verified this data and other information. If the underlying data or information is inaccurate or incomplete, the results of our analysis may likewise be inaccurate or incomplete. These results are based on our analysis of the 2014-2017 $100 \%$ Medicare Research Identifiable File (RIF) claims files and the CMS OCM specifications. Any analysis using different data sets, inputs, time periods, and methodology will produce different results.

Rob Bachler, Nick Johnson, and Meredith Russell are consulting actuaries at Milliman and are members of the American Academy of Actuaries and meet its qualification standards to render this analysis.

[^1]
## Section 2: OCM program

## ONCOLOGY CARE MODEL BACKGROUND

The Oncology Care Model (OCM) program of the Centers for Medicare and Medicaid Services (CMS) is a specialty care episode payment model that aims to "provide higher quality, more highly coordinated oncology care at the same or lower cost to Medicare." ${ }^{5}$ OCM is a voluntary model that runs from 2016 to 2021, with 176 practices and 11 nonMedicare payers participating as of February 2019. ${ }^{6}$ CMS estimates that OCM includes approximately $25 \%$ of Medicare fee-for-service (FFS) chemotherapy-related cancer care-more than 150,000 unique beneficiaries and more than 200,000 episodes each year. ${ }^{7}$ Given the size of OCM and Medicare's status as the largest payer of cancer care in the United States, ${ }^{8}$ OCM may influence oncology value-based arrangements that other payers adopt.

OCM episodes begin with outpatient chemotherapy administered through Medicare Part B or Part D and last for six months or until death. Beneficiaries who receive chemotherapy for longer than six months are eligible to initiate multiple episodes. OCM episodes include all Part A and Part B expenditures, and certain Part D expenditures-lowincome subsidy (LIS) cost-sharing amounts and $80 \%$ of the gross drug cost above the catastrophic threshold. ${ }^{9}$

OCM includes a two-part payment methodology to support model goals:

- A care management payment, set at $\$ 160$ per OCM beneficiary per month, called the monthly enhanced oncology services (MEOS) payment
- A retrospective performance-based payment that compares actual episode spending, inclusive of MEOS payments, against a discounted spending target (CMS retains the discount as savings)
CMS calculates spending targets from historical expenditures that are trended to each OCM performance period and incorporates risk adjustment factors such as: ${ }^{10}$
- Beneficiary demographics (e.g., age and gender)
- Cancer type (e.g., breast, prostate, lung)
- Provision of certain services (e.g., radiation)
- Comorbidities
- Part D LIS status
- Historical practice experience
- Adjustment for use of novel therapies

To receive a performance-based payment, a practice must exceed a minimum quality threshold and keep spending below the discounted target. All else equal, practices that achieve higher quality scores will receive higher performance-based payments. ${ }^{11}$

CMS allows practices to select one of three potential risk tracks, including a one-sided risk track, an original twosided risk track, and a recently announced alternative two-sided risk track. Under the one-sided risk track, CMS applies a 4\% discount to the reconciliation calculation, but practices are not required to repay CMS if actual spending exceeds the discounted spending target. Under the original two-sided risk track, CMS applies a $2.75 \%$ discount to the reconciliation calculation, and practices are required to repay CMS if actual spending exceeds the discounted spending target. Under the one-sided and the original two-sided risk tracks, performance-based payments can be up

[^2]to $100 \%$ of the FFS cost savings in excess of the applied discount, capped at $20 \%$ of the undiscounted spending target. Under the original two-sided risk track, repayments to CMS are capped at $20 \%$ of the undiscounted spending target. ${ }^{12}$

In late 2018, CMS announced the alternative two-sided risk track for OCM including the following modifications relative to the original two-sided risk track: ${ }^{13}$

- CMS applies a $2.5 \%$ discount, rather than $2.75 \%$, when calculating spending targets
- Practices are not required to pay back CMS unless actual spending exceeds the undiscounted spending target, rather than the discounted spending target
- Performance-based payment and repayment are capped based on the sum of annual practice revenue and Part B chemotherapy furnished by other practices to beneficiaries in OCM episodes
- Performance-based payments are capped at $16 \%$
- Repayments are capped at $8 \%$

While practices can elect one-sided risk for the duration of OCM, CMS requires that practices achieve at least one performance-based payment by mid-2019 (the fourth OCM reconciliation) to remain in one-sided risk. ${ }^{14}$ Lastly, practices that elect one of the two-sided risk tracks may be treated as Qualified Participants in an Advanced Alternative Payment Model and receive a bonus payment of $5 \%$ of Medicare FFS Part B payments (excluding drugs). ${ }^{15}$ As of February 2019, the vast majority of practices remain in the one-sided risk track.

[^3]
## Section 3: Bundled payments risk profile

## SHARED SAVINGS

The least risky form of APMs for providers, in which they are not subject to losses, can be referred to using several terms: shared savings, upside-only, or one-sided risk. The crux of this financial arrangement is that the provider is guaranteed a minimum payment equal to current reimbursement levels but has the opportunity to receive higher reimbursement if they achieve certain quantifiable objectives. Under our simplified OCM example, the minimum reimbursement would be Medicare fee-for-service (FFS) payments. On top of this floor reimbursement, groups are eligible for additional bonuses if they achieve savings targets. The table in Figure 3 shows our simulated gain distribution, relative to Medicare FFS payments, by outcome percentile. ${ }^{16}$ This table is based on our "unbiased" scenario (i.e., the calculated episode target prices accurately reflect the savings the physician group can achieve).

There are no losses reflected in Figure 3 because there is no loss potential under a one-sided risk arrangement.

FIGURE 3: APM RESULTS: ONE-SIDED RISK MODEL

|  | Hospital Affiliated |  | Non-Hospital Affiliated |  |
| :--- | :---: | :---: | :---: | :---: |
| Outcome Percentile | Small Practice | Large Practice | Small Practice | Large Practice |
| 25th | $4.9 \%$ | $2.0 \%$ | $5.1 \%$ | $2.1 \%$ |
| 50 th | $2.3 \%$ | $1.0 \%$ | $2.4 \%$ | $1.0 \%$ |
| 75th | $0.2 \%$ | $0.1 \%$ | $0.1 \%$ | $0.0 \%$ |
| 90th | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ |
| 95th | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ |
| 97th | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ |
| 98th | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ |
| 99th | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ |
| Average | $3.1 \%$ | $1.3 \%$ | $3.3 \%$ | $1.3 \%$ |

Results are the gain / (loss) presented as a percentage of Medicare FFS costs incurred.

## SHARED RISK

Arrangements where providers are subject to losses are also referred to using several terms: shared risk, full risk, two-sided risk. Under the purest form of these arrangements, providers are subject to unlimited losses if FFS costs are extremely high, while also having the potential to reap large rewards if FFS costs are substantially less than expected. In practice, these risk arrangements typically have features that limit both the losses and gains that may result. The table in Figure 4 shows our simulated gain distribution, relative to Medicare FFS payments, by outcome percentile for a two-sided risk arrangement under the unbiased scenario with risk mitigation factors similar to those found in the OCM program (and described below).

[^4]Unlike Figure 3, the table in Figure 4 shows the potential for losses.

FIGURE 4: APM RESULTS: TWO-SIDED RISK MODEL

|  | Hospital Affiliated |  | Non-Hospital Affiliated |  |
| :--- | :---: | :---: | :---: | :---: |
| Outcome Percentile | Small Practice | Large Practice | Small Practice | Large Practice |
| 25th | $3.9 \%$ | $1.5 \%$ | $4.0 \%$ | $1.6 \%$ |
| 50th | $0.2 \%$ | $0.0 \%$ | $0.2 \%$ | $0.1 \%$ |
| 75th | $(3.2 \%)$ | $(1.4 \%)$ | $(3.6 \%)$ | $(1.5 \%)$ |
| 90th | $(6.4 \%)$ | $(2.8 \%)$ | $(6.7 \%)$ | $(2.8 \%)$ |
| 95th | $(8.0 \%)$ | $(3.6 \%)$ | $(8.4 \%)$ | $(3.6 \%)$ |
| 97th | $(9.1 \%)$ | $(4.1 \%)$ | $(9.6 \%)$ | $(4.2 \%)$ |
| 98th | $(9.9 \%)$ | $(4.6 \%)$ | $(10.4 \%)$ | $(4.6 \%)$ |
| 99th | $(11.0 \%)$ | $(5.5 \%)$ | $(11.8 \%)$ | $(5.2 \%)$ |
| Average | $0.4 \%$ | $0.0 \%$ | $0.3 \%$ | $0.1 \%$ |

Results are the gain / (loss) presented as a percentage of Medicare FFS costs incurred.

## BUILT-IN RISK MITIGATION

In recognition of the risks posed by bundled payments, APMs will often have certain design features that reduce volatility in payments, while preserving the group's incentives to manage the FFS cost of episodes. Two of these features, both of which are found in the OCM program and our simplified version, are described below.

## Winsorization

The first line of defense against risk found in the two-sided OCM is the outlier provision called "winsorization." When an episode's FFS costs exceed the $95^{\text {th }}$ percentile cost level (i.e., is greater than $95 \%$ of similar episodes nationally), the episode's costs are replaced with the $95^{\text {th }}$ percentile cost in settlement calculations. Similarly, OCM episodes costing less than the $5^{\text {th }}$ percentile cost nationally are treated as though their costs were equal to the $5^{\text {th }}$ percentile cost. This prevents a single high-cost episode from driving the group's overall results. While mitigating the risk of the highest-cost episodes, this provision provides only a limited amount of protection because for many episode types even a " $95^{\text {th }}$ percentile" episode can significantly impact a physician group's results. The table in Figure 5 shows our simulated outcome distribution for non-hospital-affiliated physician groups with and without winsorization. This shows that winsorization reduces the variability in outcomes for both small and large practices. It does not have a meaningful impact on the overall expected gain/loss (shown in the "Average" row of the table), as the decreased losses in "bad" years come at the price of reduced gains in "good" years.

FIGURE 5: APM RESULTS: TWO-SIDED RISK MODEL, WINSORIZATION

|  | Small Practice |  | Large Practice <br> Outcome Percentile |  |
| :--- | :---: | :---: | :---: | :---: |
| Without Winsorization | With Winsorization | Without Winsorization | With Winsorization |  |
| 25th | $4.0 \%$ | $3.4 \%$ | $1.6 \%$ | $1.3 \%$ |
| 50th | $0.2 \%$ | $0.0 \%$ | $0.1 \%$ | $(0.0 \%)$ |
| 75th | $(3.6 \%)$ | $(3.1 \%)$ | $(1.5 \%)$ | $(1.3 \%)$ |
| 90 th | $(6.7 \%)$ | $(5.7 \%)$ | $(2.8 \%)$ | $(2.5 \%)$ |
| 95 th | $(8.4 \%)$ | $(7.2 \%)$ | $(3.6 \%)$ | $(3.1 \%)$ |
| 97 th | $(9.6 \%)$ | $(8.2 \%)$ | $(4.2 \%)$ | $(3.4 \%)$ |
| 98th | $(10.4 \%)$ | $(8.8 \%)$ | $(4.6 \%)$ | $(3.7 \%)$ |
| 99th | $(11.8 \%)$ | $(9.8 \%)$ | $(5.2 \%)$ | $(4.3 \%)$ |
| Average | $0.3 \%$ | $0.2 \%$ | $0.1 \%$ | $0.0 \%$ |

Results are the gain / (loss) presented as a percentage of Medicare FFS costs incurred. This table reflects the non-hospital-affiliated scenario.

## Gain/loss limits

If a group experiences more than a few high-cost episodes or faces inadequate target payments overall, the outlier provisions will not provide sufficient risk mitigation. As a result, CMS included a gain/loss limit provision to limit groups' risk exposure. In a "bad" year, losses due to the OCM reconciliation are limited to 20\% of the target payment. Conversely, gains in a "good" year are capped at 20\% of the target as an offset.

## TARGET PRICE RISK

In addition to the risk of random variation in the FFS cost of individual episodes, providers under a bundled payment APM also bear the risk associated with the setting of the bundled payment amount, often referred to as the target price. In the event the target prices are less than the true expected FFS cost of each episode, the group's episode costs are more likely to exceed the target. This may occur due to errors in calculating the original benchmarks used to calculate the (potentially discounted) target price. However, it can also occur in the OCM and likely any similar programs where target price calculations include a discount from the expected FFS cost and a physician group is not able to achieve the assumed level of savings through medical management. In the table in Figure 6, we present a comparison of results for non-hospital-affiliated physician groups under three different pricing scenarios and twosided risk.

1. Unbiased, accurate: The target price is always equal to the average FFS cost of the respective episode. There is no mispricing risk. These columns are identical to the "with winsorization" columns in Figure 5.
2. Unbiased, inaccurate: When aggregated across all episode types, target prices are unbiased. Target prices for individual episode types are inaccurate up to $+/-8 \%$ of the true expected FFS cost by episode type.
3. Biased, inaccurate: The target price is understated on average, with additional variation of up to $+/-8 \%$ of the true expected FFS cost by episode type. For our analysis, we assumed an average understatement of 2.75\% for two-sided risk scenarios.

FIGURE 6: APM RESULTS: TWO-SIDED RISK MODEL, MISPRICING RISK SCENARIOS

|  | Small Practice, By Pricing Error |  |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: |
| Outcome Percentile | Unbiased, <br> Accurate | Unbiased, <br> Inaccurate | Biased, <br> Inaccurate | Unbiased, <br> Accurate | Unbiased, <br> Inaccurate | Biased, <br> Inaccurate |
| 25 th | $3.4 \%$ | $3.5 \%$ | $0.5 \%$ | $1.3 \%$ | $1.5 \%$ | $(1.2 \%)$ |
| 50th | $0.0 \%$ | $(0.0 \%)$ | $(2.7 \%)$ | $(0.0 \%)$ | $0.0 \%$ | $(2.6 \%)$ |
| 75th | $(3.1 \%)$ | $(3.2 \%)$ | $(5.7 \%)$ | $(1.3 \%)$ | $(1.4 \%)$ | $(4.1 \%)$ |
| 90th | $(5.7 \%)$ | $(5.8 \%)$ | $(8.3 \%)$ | $(2.5 \%)$ | $(2.7 \%)$ | $(5.3 \%)$ |
| 95th | $(7.2 \%)$ | $(7.4 \%)$ | $(9.8 \%)$ | $(3.1 \%)$ | $(3.5 \%)$ | $(6.1 \%)$ |
| 97 th | $(8.2 \%)$ | $(8.4 \%)$ | $(10.6 \%)$ | $(3.4 \%)$ | $(4.0 \%)$ | $(6.6 \%)$ |
| 98th | $(8.8 \%)$ | $(9.1 \%)$ | $(11.2 \%)$ | $(3.7 \%)$ | $(4.3 \%)$ | $(6.9 \%)$ |
| 99th | $(9.8 \%)$ | $(10.4 \%)$ | $(12.2 \%)$ | $(4.3 \%)$ | $(5.0 \%)$ | $(7.3 \%)$ |
| Average | $0.2 \%$ | $0.3 \%$ | $(2.5 \%)$ | $0.0 \%$ | $0.1 \%$ | $(2.6 \%)$ |

Results are the gain / (loss) presented as a percentage of Medicare FFS costs incurred. This table reflects the non-hospital-affiliated scenario and includes the effect of winsorization.

Figure 6 shows that, although inaccuracies in target prices for individual episode types increase the variability of results, they do not have a negative impact on expected results as long as they are not systematically understated. This is seen by comparing the "unbiased, inaccurate" (i.e., no systematic understatement) and "biased, inaccurate" (i.e., with a systematic understatement) columns with the "unbiased, accurate" column.

## PRACTICE SIZE

The results in Figure 6 also demonstrate the difference in the variability of outcomes between small and large practices, defined for our purposes as practices that accrue 250 and 1,500 episodes on an annual basis, respectively.

Not surprisingly, the large practices face less variation. This difference in variation is strictly due to the statistical phenomenon known as "the law of large numbers", as we are not reflecting any inherent differences in clinical or operational practice that might exist between practices of different size. Overall average gains and losses for both practice sizes can be significantly impacted by biased target prices.

## Section 4: Reinsurance overview

This section will briefly describe three potential forms of reinsurance coverage: specific, aggregate, and a less common version known as aggregating specific.

## SPECIFIC REINSURANCE

The most common type of reinsurance coverage purchased by risk-taking providers is "specific" or "individual" reinsurance. Specific reinsurance policies are triggered when an individual member's FFS costs (or an episode's FFS costs, for a bundled payment), exceed the attachment point, also referred to as the specific deductible. The reinsurer then reimburses all or a portion of the costs above the deductible. This type of reinsurance is considered the most insurable and easily underwritten risk from the reinsurer's perspective and is most effective when the principal risk is "shock" losses from very large claimants. It is less effective in mitigating mispricing risk.

See the table in Figure 7 for an example calculation of specific reinsurance.

FIGURE 7: SPECIFIC REINSURANCE EXAMPLE

| EPISODE | FFS COST | SPECIFIC DEDUCTIBLE | REINSURANCE <br> REIMBURSEMENT |
| :--- | :--- | :--- | :--- |
| A | $\$ 50,000$ | $\$ 25,000$ | $\$ 25,000$ |
| B | $\$ 10,000$ | $\$ 25,000$ | $\$ 0$ |
| C | $\$ 100,000$ | $\$ 25,000$ | $\$ 75,000$ |
| D | $\$ 5,000$ | $\$ 25,000$ | $\$ 0$ |
| Total | $\$ 165,000$ |  | $\$ 100,000$ |

## AGGREGATING SPECIFIC REINSURANCE

Aggregating specific reinsurance starts with a specific reinsurance policy but also includes a second layer, the aggregating specific deductible (ASD). After calculating the amount exceeding the specific deductible for each individual member (or episode), the amounts above the deductible are summed. This sum is then compared to the ASD. If the sum exceeds the ASD, the reinsurer reimburses the excess. The ASD may be used to reduce the likelihood of reimbursement and therefore the reinsurance premium, especially for large groups or for policies with relatively low deductibles. While it provides a level of protection against individual shock losses, it can also protect the provider against an unusually large number of expensive, but not catastrophically high, members or episodes.

See the table in Figure 8 for an example calculation of aggregating specific reinsurance.

| FIGURE 8: <br> EPISODE | AGGREGATING SPECIFIC REINSURANCE EXAMPLE |  |  |
| :--- | :--- | :--- | :--- |
| A | FFS COST | SPECIFIC DEDUCTIBLE | PRE-ASD REINSURANCE <br> REIMBURSEMENT |
| B | $\$ 50,000$ | $\$ 25,000$ | $\$ 25,000$ |
| C | $\$ 10,000$ | $\$ 25,000$ | $\$ 0$ |
| D | $\$ 100,000$ | $\$ 25,000$ | $\$ 75,000$ |
| Total - Pre-ASD | $\$ 5,000$ | $\$ 25,000$ | $\$ 0$ |
| Aggregating Specific Deductible | $\$ 165,000$ | $\$ 75,000$ | $\$ 100,000$ |

[^5]
## AGGREGATE ONLY REINSURANCE

Aggregate reinsurance reimburses groups when the total medical costs for the group exceed a certain threshold, usually defined as a proportion of expected medical costs and referred to as the aggregate corridor. While aggregate reinsurance more directly addresses a group's overall risk, it can be considered a less insurable risk, requires more careful and sophisticated underwriting, and can result in volatile loss ratios for the reinsurer. For these reasons, it may not be as widely available to providers as specific reinsurance coverage. However, it can be a very effective means of mitigating risk at a lower overall cost than specific coverage.

See the table in Figure 9 for an example calculation of aggregate reinsurance.

| FIGURE 9: | AGGREGATE STOP-LOSS EXAMPLE |  |
| :--- | :--- | :--- |
| EPISODE | FFS COST |  |
| A | $\$ 50,000$ | $\$ 25,000$ |
| B | $\$ 10,000$ | $\$ 25,000$ |
| C | $\$ 100,000$ | $\$ 25,000$ |
| D | $\$ 5,000$ | $\$ 25,000$ |
| Total | $\$ 165,000$ | $\$ 100,000$ |
| Aggregate Corridor |  | $105 \%$ of Target $(\$ 105,000)$ |
| Reimbursement |  | $\$ 60,000$ |

The $\$ 165,000$ in total episode FFS costs is compared to the attachment point of $\$ 105,000$ : The excess amount is $\$ 60,000$, which is the final reimbursement.

Note that the three types of reinsurance have been presented in order of least to most volatile from the reinsurer's perspective. Accordingly, the risk margin demanded by reinsurers typically follows the same pattern, with specific coverage premiums including a lower margin rate ${ }^{17}$ than ASD coverage, and aggregate-only coverage including the highest margin rate.

## KEY ISSUES FOR MEDICAL PROVIDERS AND REINSURERS

Traditional purchasers of reinsurance include insurance companies and health plans, but as alternative payment models (APMs) become more prevalent, the number and diversity of entities taking on healthcare risk is growing. Because these entities can be smaller (i.e., potentially subject to more random variation in costs) and less tolerant of risk, they are a prime market for reinsurance. However, reinsurance policies for non-insurers must account for the differences between traditional purchasers and these newer risk takers.

Generally the reinsurer will underwrite risk only where the purchaser has significant downside potential. For example, in the "shared savings" model in the OCM program, the physician group has only upside potential and can receive no less than Medicare FFS for services provided. A reinsurer is less likely to reinsure such an arrangement, because the group does not have the threat of losses to provide incentive for containing FFS costs.

A reinsurer will generally design the reinsurance contract to avoid reimbursing the provider for FFS costs that the provider is not otherwise responsible for. As an example, a reinsurer is unlikely to set a specific deductible higher than an outlier truncation, or winsorization, point embedded within the APM because the group is not at risk for FFS costs above that point. Similarly, on aggregate coverage, a reinsurer would not reimburse FFS costs above any builtin risk protection such as a stop-loss limit that is part of the APM.

Finally, because medical providers presumably have more control over FFS costs than traditional reinsurance purchasers, reinsurers may place additional limitations within the policy. Two fairly common limitations are assumptions of cost/reimbursement levels below typical payer reimbursement and imposition of a coinsurance whereby the provider is still responsible for a share of losses above the reinsurance deductible.

[^6]
## Section 5: Risk mitigation through reinsurance

This section illustrates the variability of results that a provider might expect under an APM as well as the impact different types of reinsurance can have on that variability. The results of our analysis also show how different characteristics of the physician group or the APM structure can affect both outcome variability and the effectiveness of reinsurance.

Please see Section 6 below for assumptions and methodology used in the APM modeling.
It is important to note that although OCM reconciliations are performed on a semiannual basis, we expect reinsurance carriers would most likely write coverage on an annual basis. Therefore, we modeled the reinsurance contracts and physician group gains/losses on an annual basis.

The attachment points of the various reinsurance types have been set as follows:

- Specific
- Attachment point for each cancer type is two times the target price
- Aggregating specific
- Specific attachment point for each cancer type is equal to the target price
- Aggregating specific deductible is $25 \%$ of the summed target price for all episodes
- Aggregate
- Aggregate attachment point is $105 \%$ of the sum of target price for all episodes

We have assumed specific or aggregating specific policies are constructed so that episodes costing more than the attachment point will be paid out even in "good" years where the group receives a performance-based payment (PBP) from CMS. This design feature not only provides a form of protection against losses, but also protects a group's gains against outlier episodes. Groups that are only concerned with mitigating losses may prefer an aggregate policy, which provides no reimbursements in "good" years, but offers a reduced cost of reinsurance as a result.

## RESULTS

In the table in Figure 10, the distribution of loss outcomes is shown without reinsurance coverage and in the presence of each reinsurance type when we assume unbiased, but inaccurate, target rates ${ }^{18}$ and winsorization consistent with the OCM program. Gains and losses are presented as a proportion of FFS Medicare episode costs. The calculation of gains and losses is limited to bundled payment episode spending. To the extent that the physician group sees nonMedicare patients, the payment base will be larger than shown and the risk of a Medicare-only program as a percentage of episode spending will be lower than shown.

Note that, in Figures 10 and 11, the gain/loss results for the reinsurance scenarios reflect an offset for the cost of the reinsurance premium. Therefore, in some cases, results in the presence of reinsurance are actually worse than the "no reinsurance" scenario.

[^7]FIGURE 10: APM RESULTS: TWO-SIDED RISK MODEL, IMPACT OF REINSURANCE

|  | SMALL PRACTICE, BY REINSURANCE TYPE |  |  |  | LARGE PRACTICE, BY REINSURANCE TYPE |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| OUTCOME PERCENTILE | NONE | SPECIFIC | AGG. SPEC. | AGGREGATE | NONE | SPECIFIC | AGG. SPEC. | AGGREGATE |
| 25th | 3.5\% | 1.1\% | (0.1\%) | 2.3\% | 1.5\% | (0.6\%) | (0.8\%) | 1.5\% |
| 50th | (0.0\%) | (2.0\%) | (1.8\%) | (1.1\%) | 0.0\% | (1.9\%) | (1.4\%) | 0.0\% |
| 75th | (3.2\%) | (4.6\%) | (3.2\%) | (4.2\%) | (1.4\%) | (3.1\%) | (2.1\%) | (1.5\%) |
| 90th | (5.8\%) | (7.0\%) | (4.4\%) | (5.4\%) | (2.7\%) | (4.2\%) | (2.6\%) | (2.8\%) |
| 95th | (7.4\%) | (8.3\%) | (5.1\%) | (5.5\%) | (3.5\%) | (4.8\%) | (2.9\%) | (3.5\%) |
| 97th | (8.4\%) | (9.3\%) | (5.6\%) | (5.6\%) | (4.0\%) | (5.3\%) | (3.1\%) | (4.0\%) |
| 98th | (9.1\%) | (9.9\%) | (5.9\%) | (5.6\%) | (4.3\%) | (5.6\%) | (3.3\%) | (4.4\%) |
| 99th | (10.4\%) | (10.8\%) | (6.4\%) | (5.7\%) | (5.0\%) | (6.1\%) | (3.5\%) | (4.5\%) |
| Average | 0.3\% | (1.7\%) | (1.5\%) | (0.4\%) | 0.1\% | (1.9\%) | (1.4\%) | 0.0\% |

Results are the gain / (loss) presented as a percentage of Medicare FFS costs incurred. This table reflects the non-hospital-affiliated scenario, includes the effect of winsorization, and reflects unbiased, inaccurate target payments.

While exact results will differ based on the characteristics of the covered APM and the terms of the reinsurance coverage, Figure 10 leads to conclusions that we expect would be generally true with an episode-based APM with characteristics similar to OCM.

- In the absence of any reinsurance, large physician groups will tend to experience smaller losses as a percentage of total episode spending in "bad" years than smaller practices.
- Aggregate coverage will provide more dependable coverage against the highest possible losses given that, by definition, it limits total losses.
- Specific coverage alone does not provide the desired protection against large overall losses. This is likely due, in part, to the presence of winsorization within the OCM parameters underlying Figure 10.
- The aggregating specific coverage is more effective than specific coverage in limiting the loss at the highest percentile outcomes, especially for small practices.
- Due to lower volumes of episodes, small practices generally experience more volatility than large practices. This makes an aggregate reinsurance payout more likely, resulting in a higher net cost of reinsurance coverage for small groups.
- While some of the coverage options offer risk protection in the event of a loss, this protection comes at a cost that reduces potential gains. For example, in Figure 10, the $25^{\text {th }}$ percentile outcome for a small practice is a gain of $3 \%$ in the absence of reinsurance. Reinsurance premiums would cut this gain down between $0 \%$ and $2 \%$, depending on the type of reinsurance coverage selected.

The table in Figure 11 is similar to Figure 10, but shows results under the assumption that target rates are biased, or understated, by $2.75 \%$.

FIGURE 11: IMPACT OF REINSURANCE ON RISK

|  | SMALL PRACTICE, BY REINSURANCE TYPE |  |  |  | LARGE PRACTICE, BY REINSURANCE TYPE |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| OUTCOME PERCENTILE | NONE | SPECIFIC | AGG. SPEC. | AGGREGATE | NONE | SPECIFIC | AGG. SPEC. | AGGREGATE |
| 25th | 0.5\% | (2.1\%) | (3.6\%) | (2.4\%) | (1.2\%) | (3.5\%) | (4.2\%) | (1.7\%) |
| 50th | (2.7\%) | (4.8\%) | (5.1\%) | (5.4\%) | (2.6\%) | (4.7\%) | (4.8\%) | (3.2\%) |
| 75th | (5.7\%) | (7.4\%) | (6.4\%) | (6.9\%) | (4.1\%) | (5.9\%) | (5.4\%) | (4.6\%) |
| 90th | (8.3\%) | (9.6\%) | (7.5\%) | (7.2\%) | (5.3\%) | (6.9\%) | (5.9\%) | (5.0\%) |
| 95th | (9.8\%) | (10.8\%) | (8.1\%) | (7.4\%) | (6.1\%) | (7.6\%) | (6.2\%) | (5.1\%) |
| 97th | (10.6\%) | (11.6\%) | (8.5\%) | (7.5\%) | (6.6\%) | (8.0\%) | (6.4\%) | (5.1\%) |
| 98th | (11.2\%) | (12.1\%) | (8.8\%) | (7.5\%) | (6.9\%) | (8.2\%) | (6.5\%) | (5.1\%) |
| 99th | (12.2\%) | (12.9\%) | (9.2\%) | (7.6\%) | (7.3\%) | (8.6\%) | (6.8\%) | (5.1\%) |
| Average | (2.5\%) | (4.7\%) | (4.9\%) | (4.2\%) | (2.6\%) | (4.7\%) | (4.8\%) | (2.9\%) |

Results are the gain / (loss) presented as a percentage of Medicare FFS costs incurred. This table reflects the non-hospital-affiliated scenario, includes the effect of winsorization, and reflects biased, inaccurate target payments.

Comparing Figure 11 to Figure 10 provides insight into what different types of reinsurance can and cannot do.

- Aggregate reinsurance provides the same protection against significant losses even when target rates are understated. The same is not true for specific or aggregating specific coverage.
- This illustrates a key reason that reinsurers require more data and a higher margin to underwrite aggregate coverage. With aggregate coverage, the reinsurer is taking on the risk of inaccurate target prices.
- This observation assumes the aggregate attachment points are set using target rates as a foundation. Reinsurers may set the attachment point using different values as the basis.
- No type of reinsurance will completely prevent understated target rates from reducing expected gains (or increasing expected losses) to providers.


## Section 6: Data and methodology

## MEDICARE RESEARCH IDENTIFIABLE FILE

The 100\% Medicare RIF claims files contain all Medicare paid FFS claims generated for all Medicare FFS beneficiaries. Information in the claims files includes diagnosis codes, procedure codes, diagnosis-related group (DRG) codes, site of service information, and beneficiary information, including age, eligibility status, and an indicator for Medicare Advantage enrollment.

## CMS OCM documentation

- OCM Initiating Cancer Therapies and Codes (OCM Initiating Cancer Therapies and Codes Effective 01.02.2018_v1.4_20180416.xIsx)
- OCM Cancer Type Mapping and Codes, which includes both ICD-9 and ICD-10 mapping (OCM Cancer Type Mapping and Codes Effective 07.02.17_20170501.xlsx)
- OCM Performance-Based Payment Methodology (OCM PBP Methodology Effective 07.02.2017_v5.1_20190103.pdf)
- OCM Prediction Model Code Lists (OCM Prediction Model Code Lists Effective 07.02.2017_20171227.xlsx)


## SUMMARY OF EPISODES

## Constructing episodes

1. We identified all Part B and Part D index chemotherapy claims (ICCs) for Medicare fee-for-service beneficiaries nationally between January 1, 2014, and June 30, 2017.
2. We defined an ICC as a Part B or Part D chemotherapy claim that did not occur within six months of another potential ICC (See Appendix B).
a. Beneficiaries must have been enrolled in Medicare FFS Parts $A$ and $B$ and not have been receiving eligibility through the end-stage renal disease (ESRD) benefit for six months following the potential index claim (or until death).
b. Beneficiaries must also have had at least one professional evaluation and management (E\&M) claim with a cancer diagnosis code in the six months following the ICC.
3. We flagged Part B ICCs for the presence of a cancer diagnosis code used in OCM (see Appendix C). Because Part D claims do not have diagnosis codes, Part D ICCs must have had professional or hospital outpatient claims with cancer diagnoses in the 59 days before or on the service date. We did not impose this requirement to Part D ICCs with service dates before March 1, 2014, because we do not have access to 2013 claims.
4. We then constructed episodes for each qualifying ICC using all available claims incurred in the six months including and following the ICC.
a. For Part A and B claims, we calculated episode spending from paid amounts on claims. For Part D claims, we calculated episode spending from $80 \%$ of the gross drug cost above the catastrophic threshold and low-income subsidies (these are the Part D spending components that CMS includes in OCM episode spending).
5. We trended episode spending amounts for 2014, 2015, and 2016 episodes to 2017 dollars by cancer types. We grouped all episodes with non-reconciliation-eligible cancer types together when trending.
6. After trending to 2017 dollars, we normalized episode spending within each hospital referral region (HRR) by cancer type. This was based on the ratio of average episode spending for each cancer type within an HRR to the national average episode spending for each cancer type. We grouped all episodes with non-reconciliation-eligible cancer types together when normalizing spending.

## Assigning cancer types

Following OCM, we assigned a cancer type to each episode based on the plurality of cancer diagnosis codes on professional E\&M claims that occur during each six-month episode. In the event of a tie, we applied the OCM tiebreaker logic by assigning the cancer type associated with:

1. The most recent visit in the episode
2. The cancer type that is reconciliation-eligible
3. The lowest last digit of the Taxpayer Identification Number (TIN)

See Appendices D and E for the cancer diagnosis codes. Additionally, we stratified bladder, breast, and prostate cancer episodes into high- and low-risk (low- and high-intensity for prostate, per CMS terminology) strata, based on drugs used in the episodes. See Appendices F, G, and H for the specific drugs used for this exercise.

## "OCM" ASSUMPTIONS

While we are using the OCM as a guide for the chemotherapy bundled program modeled in the analysis, we have not exactly adhered to its terms or structure, in order to simplify the analysis and make the results more universal for other chemotherapy bundled payments. Listed below are the key features of the bundled payments modeled:

- Winsorization of individual episode FFS costs at 5th and 95th percentiles.
- Both gains and losses are capped at $20 \%$ of the target.
- A benchmark discount of $2.75 \%$ (for two-sided risk) and $4.00 \%$ (for one-sided risk).
- Semiannual reconciliation of the PBP

The components of the OCM program we have disregarded include but are not limited to the novel therapies adjustment, the performance multiplier, the experience adjuster, and the MEOS payment.

Although OCM includes LIS status as a component of its target rate setting, this factor was not deemed separately important for our reinsurance modeling.

## SIMULATION OF POTENTIAL OUTCOMES

To model the risk facing physician groups under the APM, we built a simulation model to randomly generate outcome "years." The model develops approximate APM payments and reinsurance payouts in seven key steps, which are described below.

## Step 1: Calculate implied benchmark prices

For the purpose of this analysis, we assumed the "correct" benchmark price for a particular episode type was the average cost of all episodes of that type found in our data. This benchmark price was later used in the development of the assumed target price per episode, with adjustments dependent upon the scenario being tested.

## Step 2: Randomly generate target prices and episode counts

The overall episode count mean varies by practice size and the overall distribution by cancer type and setting is assumed to be consistent with the nationwide average from the $100 \%$ Medicare RIF data. For each iteration of the simulation, we generate random numbers from Poisson distributions developed using the nationwide average distribution of cancer types and settings to simulate the episode counts for each cancer type and setting.

For the scenarios where target prices vary from the calculated benchmark, we applied the following adjustments

- For scenarios where the target prices were assumed to be "inaccurate", we used a uniform distribution to randomly select a separate benchmark pricing error for each episode type.
- For scenarios incorporating "target bias", the target price was reduced by the bias percentage.


## Step 3: Estimate distribution of episode costs

FFS costs for each cancer type and setting are randomly pulled from the $100 \%$ Medicare RIF percentile set. To fully account for the variation of lower and upper data extremes, we also included the minimum and maximum observed episode costs as "shock" claims. These shocks are triggered in the bottom and top $x \%$ of simulated scenarios, respectively, where $x$ is chosen to reflect the variation in the distribution for each cancer type/setting. This simulation is performed twice to produce two six-month episode periods.

Step 4: Estimate the PBP in the absence of reinsurance
Winsorization, stop-gain, and stop-loss provisions are applied to each simulated episode based on the scenario's settings. For each six-month episode period, the total episode costs from Step 3 are compared to the calculated target payment from Step 2. The results are two implied payments to/from CMS.

## Step 5: Estimate reimbursements from and cost of specific coverage

The reimbursement for specific coverage is calculated on each individual episode that was simulated in Step 3:

- Episodes below the specific attachment point are not reimbursed.
- For claims above the specific attachment point, but below the winsorization threshold (the $95^{\text {th }}$ percentile FFS cost), costs above the specific attachment point are reimbursed at $100 \%$.
- For claims above the upper outlier threshold, costs above the upper outlier threshold are not reimbursed by the reinsurer because they are not included in CMS's PBP calculation. Therefore, the specific reimbursement for these claims is equal to the upper outlier threshold less the specific attachment point.

These reinsurance reimbursements were averaged across all "years". The cost of specific reinsurance was then calculated as the average reimbursement, divided by 0.75 . This implies that the gross margin retained by a reinsurer would be $25 \%$.

Step 6: Estimate reimbursements from and cost of ASD
Using the same simulated episode costs as Step 3, amounts in excess of the specific attachment point are aggregated. Note that the specific attachment points in this step are not the same as those used in Step 5. We have set the specific attachment points for the ASD equal to the target prices. The ASD is then calculated as $25 \%$ of the sum of the target price for all episodes combined. The reimbursement resulting from the excess coverage (specific coverage with ASD) is computed as the sum of the excess amounts less the calculated ASD.

These reinsurance reimbursements were averaged across all "years". The cost of aggregating specific reinsurance was then calculated as the average reimbursement, divided by 0.70 . This implies that the gross margin retained by a reinsurer would be $30 \%$. The slightly higher reinsurer margin compensates the reinsurer for the slightly higher volatility of financial results they would expect from aggregating specific coverage.

Step 7: Estimate reimbursements from and cost of aggregate coverage
The FFS cost for all episodes (post-winsorization, if applicable) is summed and compared to the aggregate attachment point ( $105 \%$ of the total target value). Any excess is reimbursable under aggregate coverage until the OCM stop-loss of $20 \%$ is triggered, at which point the aggregate reimbursement is capped.

These reinsurance reimbursements were averaged across all "years". The cost of aggregate reinsurance was then calculated as the average reimbursement, divided by 0.40 . This implies that the gross margin retained by a reinsurer would be $60 \%$. The higher reinsurer margin compensates the reinsurer for the much higher volatility of financial results they would expect from aggregate coverage. The difference in gross margins applied for specific and aggregate coverage is typical of the differences found in the reinsurance marketplace.

## MODELED SCENARIOS

Using our model, we tested several scenarios to understand risk under a wide array of circumstances. The results of these scenarios are described in part throughout the body of this report. We have included results for all scenarios in Appendix A to allow for comparison of the impact of reinsurance under different scenarios.

- Two models substantially similar to the OCM: shared savings (one-sided) and a full, two-sided risk arrangement.
- Three scenarios for accuracy of the OCM episode target price:
- The target price is unbiased and equal to the average FFS cost of such an episode
- The target price is unbiased, but inaccurate up to $+/-8 \%$ of the true expected FFS cost by episode type.
- The target price is understated on average, with additional variation of up to $+/-8 \%$ of the true expected FFS cost by episode type. The mean understatement is $4 \%$ for one-sided and $2.75 \%$ for two-sided models. ${ }^{19}$
- Two practice sizes: large (mean of 1,500 episodes annually) and small (mean of 250 episodes annually).
- Two practice types: hospital-affiliated and non-hospital-affiliated, because episode FFS costs vary by outpatient versus office setting
- Two outlier options: no winsorization and winsorization at $5^{\text {th }} / 95^{\text {th }}$ percentiles.


## CONSIDERATIONS

As described in the Data and Methodology section of this report, we made a number of adjustments to CMS's current OCM framework for the purposes of our modeling, for the sake of simplification and universality. Therefore, the results should not be considered directly applicable to the OCM program, and should not be relied upon as such.
We have modeled a distribution of cancer types that is based on that seen across the entire $100 \%$ Medicare RIF data set. If a provider group expected a distribution skewed heavily toward certain cancer types, it may face a very different risk profile than the results presented in this report.
We have not assumed any management savings above what is reflected in the raw data. To the extent a group implements management practices and achieves savings as a result, the risk profile will be affected.
The analysis was developed based on our expectation of viable reinsurance product designs. Actual coverages offered by reinsurers may vary in design and premium from those presented in this report.

[^8]
## Section 7: Conclusion

Based on our analysis, we believe reinsurance can be a viable means of limiting the risks providers accept through APMs such as CMS's OCM program. However, providers entering into APMs with the intention of using reinsurance agreements need to understand the implications. A non-exhaustive list of these important implications includes:

- Because reinsurance provides greater protection to smaller physician groups, it will be more expensive for smaller groups.
- Physician groups should expect that, on average, the purchase of reinsurance would have a net cost. There is a cost to be protected against risk.
- Aggregate reinsurance provides stronger protection than specific reinsurance against significant overall losses while generally being less costly. It is also much more likely to result in no reimbursement, but this should not be viewed as a drawback to the coverage.
- Aggregate reinsurance can provide some protection against poor APM design. However, this puts the reinsurer at greater risk, meaning it needs more information and a larger risk margin to provide the coverage.
- Aggregating specific coverage can be an effective alternative for limiting extreme losses, especially for smaller practices.
- No type of reinsurance will completely prevent understated target rates from reducing expected gains (or increasing expected losses) to providers.

Appendix A: All Results

| Table Number | Practice Size | Mispricing Scenario | Winsorization | Hospital Affiliation | Risk Model |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Small | Unbiased, Accurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 2 | Small | Unbiased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 3 | Small | Biased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 4 | Large | Unbiased, Accurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 5 | Large | Unbiased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 6 | Large | Biased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 7 | Small | Unbiased, Accurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 8 | Small | Unbiased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 9 | Small | Biased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 10 | Large | Unbiased, Accurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 11 | Large | Unbiased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 12 | Large | Biased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 13 | Small | Unbiased, Accurate | None | Hosp. Affiliated | One-Sided |
| 14 | Small | Unbiased, Inaccurate | None | Hosp. Affiliated | One-Sided |
| 15 | Small | Biased, Inaccurate | None | Hosp. Affiliated | One-Sided |
| 16 | Large | Unbiased, Accurate | None | Hosp. Affiliated | One-Sided |
| 17 | Large | Unbiased, Inaccurate | None | Hosp. Affiliated | One-Sided |
| 18 | Large | Biased, Inaccurate | None | Hosp. Affiliated | One-Sided |
| 19 | Small | Unbiased, Accurate | None | Hosp. Affiliated | Two-Sided |
| 20 | Small | Unbiased, Inaccurate | None | Hosp. Affiliated | Two-Sided |
| 21 | Small | Biased, Inaccurate | None | Hosp. Affiliated | Two-Sided |
| 22 | Large | Unbiased, Accurate | None | Hosp. Affiliated | Two-Sided |
| 23 | Large | Unbiased, Inaccurate | None | Hosp. Affiliated | Two-Sided |
| 24 | Large | Biased, Inaccurate | None | Hosp. Affiliated | Two-Sided |
| 25 | Small | Unbiased, Accurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 26 | Small | Unbiased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 27 | Small | Biased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 28 | Large | Unbiased, Accurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 29 | Large | Unbiased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 30 | Large | Biased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 31 | Small | Unbiased, Accurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 32 | Small | Unbiased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 33 | Small | Biased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 34 | Large | Unbiased, Accurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 35 | Large | Unbiased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 36 | Large | Biased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 37 | Small | Unbiased, Accurate | None | Non-Hosp. Affiliated | One-Sided |
| 38 | Small | Unbiased, Inaccurate | None | Non-Hosp. Affiliated | One-Sided |
| 39 | Small | Biased, Inaccurate | None | Non-Hosp. Affiliated | One-Sided |
| 40 | Large | Unbiased, Accurate | None | Non-Hosp. Affiliated | One-Sided |
| 41 | Large | Unbiased, Inaccurate | None | Non-Hosp. Affiliated | One-Sided |
| 42 | Large | Biased, Inaccurate | None | Non-Hosp. Affiliated | One-Sided |
| 43 | Small | Unbiased, Accurate | None | Non-Hosp. Affiliated | Two-Sided |
| 44 | Small | Unbiased, Inaccurate | None | Non-Hosp. Affiliated | Two-Sided |
| 45 | Small | Biased, Inaccurate | None | Non-Hosp. Affiliated | Two-Sided |
| 46 | Large | Unbiased, Accurate | None | Non-Hosp. Affiliated | Two-Sided |
| 47 | Large | Unbiased, Inaccurate | None | Non-Hosp. Affiliated | Two-Sided |
| 48 | Large | Biased, Inaccurate | None | Non-Hosp. Affiliated | Two-Sided |


| Table Number | Practice Size | Mispricing Scenario | Winsorization | Hospital Affiliation | Risk Model |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Small | Unbiased, Accurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 2 | Small | Unbiased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 3 | Small | Biased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 4 | Large | Unbiased, Accurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 5 | Large | Unbiased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |
| 6 | Large | Biased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | One-Sided |


| Table 1 - Distribution of Outcomes (\% of Med. FFS Costs) |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Outcome <br> Percentile | Without Reinsurance | Specific Reinsurance | Agg. Spec. Reinsurance | Aggregate Reinsurance |
| 25th | 4.2\% | n/a | n/a | n/a |
| 50th | 1.9\% | n/a | n/a | n/a |
| 75th | 0.0\% | n/a | n/a | n/a |
| 90th | 0.0\% | n/a | n/a | n/a |
| 95th | 0.0\% | n/a | n/a | n/a |
| 97th | 0.0\% | n/a | n/a | n/a |
| 98th | 0.0\% | n/a | n/a | n/a |
| 99th | 0.0\% | n/a | n/a | n/a |
| Average | 2.6\% | n/a | n/a | n/a |
| Standard Deviation | 2.8\% | n/a | n/a | n/a |

Table 2 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25 th | $4.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $1.9 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75 th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90 th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $2.7 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $2.9 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 3 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25 th | $1.7 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50 th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75 th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90 th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |  |
| Average | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |  |
| Standard Deviation | $1.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |


| Table Number | Practice Size | Mispricing Scenario | Winsorization | Hospital Affiliation | Risk Model |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 7 | Small | Unbiased, Accurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 8 | Small | Unbiased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 9 | Small | Biased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 10 | Large | Unbiased, Accurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 11 | Large | Unbiased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |
| 12 | Large | Biased, Inaccurate | 5th/95th Percentile | Hosp. Affiliated | Two-Sided |

Table 7 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $3.1 \%$ | $1.2 \%$ | $0.6 \%$ | $2.3 \%$ |
| 50th | $0.1 \%$ | $-1.6 \%$ | $-1.2 \%$ | $-0.7 \%$ |
| 75th | $-2.8 \%$ | $-4.1 \%$ | $-2.7 \%$ | $-3.6 \%$ |
| 90th | $-5.4 \%$ | $-6.3 \%$ | $-3.9 \%$ | $-5.2 \%$ |
| 95th | $-6.8 \%$ | $-7.6 \%$ | $-4.5 \%$ | $-5.3 \%$ |
| 97th | $-7.8 \%$ | $-8.4 \%$ | $-5.0 \%$ | $-5.4 \%$ |
| 98th | $-8.5 \%$ | $-9.0 \%$ | $-5.3 \%$ | $-5.4 \%$ |
| 99th | $-9.5 \%$ | $-10.0 \%$ | $-5.7 \%$ | $-5.4 \%$ |
| Average | $0.2 \%$ | $-1.4 \%$ | $-0.8 \%$ | $-0.3 \%$ |
| Standard Deviation | $4.4 \%$ | $3.9 \%$ | $2.7 \%$ | $3.9 \%$ |
|  |  |  |  |  |

Table 8 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $3.2 \%$ | $1.3 \%$ | $0.6 \%$ | $2.3 \%$ |
| 50th | $0.1 \%$ | $-1.6 \%$ | $-1.3 \%$ | $-0.8 \%$ |
| 75th | $-3.0 \%$ | $-4.2 \%$ | $-2.8 \%$ | $-3.8 \%$ |
| 90th | $-5.6 \%$ | $-6.5 \%$ | $-4.0 \%$ | $-5.3 \%$ |
| 95th | $-7.0 \%$ | $-7.8 \%$ | $-4.7 \%$ | $-5.4 \%$ |
| 97th | $-7.9 \%$ | $-8.6 \%$ | $-5.1 \%$ | $-5.4 \%$ |
| 98th | $-8.5 \%$ | $-9.2 \%$ | $-5.4 \%$ | $-5.5 \%$ |
| 99th | $-9.7 \%$ | $-10.0 \%$ | $-5.8 \%$ | $-5.5 \%$ |
| Average | $0.2 \%$ | $-1.4 \%$ | $-0.9 \%$ | $-0.4 \%$ |
| Standard Deviation | $4.6 \%$ | $4.0 \%$ | $2.8 \%$ | $4.0 \%$ |

Table 9 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $0.4 \%$ | $-1.8 \%$ | $-3.0 \%$ | $-2.1 \%$ |
| 50th | $-2.7 \%$ | $-4.4 \%$ | $-4.4 \%$ | $-5.1 \%$ |
| 75th | $-5.5 \%$ | $-6.8 \%$ | $-5.7 \%$ | $-6.6 \%$ |
| 90th | $-7.9 \%$ | $-9.0 \%$ | $-6.7 \%$ | $-6.9 \%$ |
| 95th | $-9.3 \%$ | $-10.2 \%$ | $-7.3 \%$ | $-7.0 \%$ |
| 97th | $-10.2 \%$ | $-10.9 \%$ | $-7.8 \%$ | $-7.1 \%$ |
| 98th | $-10.8 \%$ | $-11.5 \%$ | $-8.1 \%$ | $-7.2 \%$ |
| 99th | $-11.8 \%$ | $-12.2 \%$ | $-8.5 \%$ | $-7.2 \%$ |
| Average | $-2.4 \%$ | $-4.2 \%$ | $-4.2 \%$ | $-4.0 \%$ |
| Standard Deviation | $4.4 \%$ | $3.8 \%$ | $2.2 \%$ | $3.3 \%$ |

Table 10 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.2 \%$ | $-0.5 \%$ | $-0.2 \%$ | $1.2 \%$ |
| 50th | $0.0 \%$ | $-1.6 \%$ | $-0.8 \%$ | $0.0 \%$ |
| 75th | $-1.2 \%$ | $-2.6 \%$ | $-1.4 \%$ | $-1.2 \%$ |
| 90th | $-2.3 \%$ | $-3.6 \%$ | $-1.8 \%$ | $-2.3 \%$ |
| 95th | $-2.9 \%$ | $-4.1 \%$ | $-2.1 \%$ | $-2.9 \%$ |
| 97th | $-3.3 \%$ | $-4.5 \%$ | $-2.3 \%$ | $-3.3 \%$ |
| 98th | $-3.6 \%$ | $-4.8 \%$ | $-2.5 \%$ | $-3.6 \%$ |
| 99th | $-4.0 \%$ | $-5.1 \%$ | $-2.7 \%$ | $-4.0 \%$ |
| Average | $0.0 \%$ | $-1.6 \%$ | $-0.8 \%$ | $0.0 \%$ |
| Standard Deviation | $1.8 \%$ | $1.6 \%$ | $0.9 \%$ | $1.8 \%$ |

Table 11 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.4 \%$ | $-0.3 \%$ | $-0.2 \%$ | $1.4 \%$ |
| 50th | $0.0 \%$ | $-1.6 \%$ | $-0.9 \%$ | $0.0 \%$ |
| 75th | $-1.4 \%$ | $-2.8 \%$ | $-1.5 \%$ | $-1.4 \%$ |
| 90th | $-2.7 \%$ | $-3.9 \%$ | $-2.0 \%$ | $-2.7 \%$ |
| 95th | $-3.4 \%$ | $-4.5 \%$ | $-2.3 \%$ | $-3.4 \%$ |
| 97th | $-3.8 \%$ | $-4.9 \%$ | $-2.5 \%$ | $-3.8 \%$ |
| 98th | $-4.2 \%$ | $-5.2 \%$ | $-2.7 \%$ | $-4.2 \%$ |
| 99th | $-4.7 \%$ | $-5.7 \%$ | $-2.9 \%$ | $-4.5 \%$ |
| Average | $0.0 \%$ | $-1.6 \%$ | $-0.8 \%$ | $0.0 \%$ |
| Standard Deviation | $2.1 \%$ | $1.8 \%$ | $1.0 \%$ | $2.1 \%$ |


| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $-1.3 \%$ | $-3.2 \%$ | $-3.6 \%$ | $-1.7 \%$ |
| 50th | $-2.7 \%$ | $-4.4 \%$ | $-4.2 \%$ | $-3.1 \%$ |
| 75th | $-4.0 \%$ | $-5.6 \%$ | $-4.7 \%$ | $-4.5 \%$ |
| 90th | $-5.2 \%$ | $-6.5 \%$ | $-5.2 \%$ | $-5.0 \%$ |
| 95th | $-5.8 \%$ | $-7.1 \%$ | $-5.5 \%$ | $-5.0 \%$ |
| 97th | $-6.3 \%$ | $-7.5 \%$ | $-5.7 \%$ | $-5.0 \%$ |
| 98th | $-6.6 \%$ | $-7.8 \%$ | $-5.8 \%$ | $-5.0 \%$ |
| 99th | $-7.1 \%$ | $-8.2 \%$ | $-6.0 \%$ | $-5.1 \%$ |
| Average | $-2.6 \%$ | $-4.4 \%$ | $-4.2 \%$ | $-2.9 \%$ |
| Standard Deviation | $2.0 \%$ | $1.7 \%$ | $0.8 \%$ | $1.8 \%$ |


| Table Number | Practice Size | Mispricing Scenario | Winsorization | Hospital Affiliation | Risk Model |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 13 | Small | Unbiased, Accurate | None | Hosp. Affiliated | One-Sided |
| 14 | Small | Unbiased, Inaccurate | None | Hosp. Affiliated | One-Sided |
| 15 | Small | Biased, Inaccurate | None | Hosp. Affiliated | One-Sided |
| 16 | Large | Unbiased, Accurate | None | Hosp. Affiliated | One-Sided |
| 17 | Large | Unbiased, Inaccurate | None | Hosp. Affiliated | One-Sided |
| 18 | Large | Biased, Inaccurate | None | Hosp. Affiliated | One-Sided |

Table 13 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25 th | $4.9 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $2.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $3.1 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $3.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 14 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $5.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $2.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.1 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $3.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $3.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 15 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $2.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $0.1 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $1.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $2.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 16 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $2.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $1.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.1 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $1.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $1.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 17 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $2.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $1.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $1.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $1.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 18 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $0.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $0.5 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |


| Table Number | Practice Size | Mispricing Scenario | Winsorization | Hospital Affiliation | Risk Model |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 19 | Small | Unbiased, Accurate | None | Hosp. Affiliated | Two-Sided |
| 20 | Small | Unbiased, Inaccurate | None | Hosp. Affiliated | Two-Sided |
| 21 | Small | Biased, Inaccurate | None | Hosp. Affiliated | Two-Sided |
| 22 | Large | Unbiased, Accurate | None | Hosp. Affiliated | Two-Sided |
| 23 | Large | Unbiased, Inaccurate | None | Hosp. Affiliated | Two-Sided |
| 24 | Large | Biased, Inaccurate | None | Hosp. Affiliated | Two-Sided |

Table 19 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $3.9 \%$ | $0.3 \%$ | $0.0 \%$ | $2.5 \%$ |
| 50th | $0.2 \%$ | $-2.5 \%$ | $-1.8 \%$ | $-1.1 \%$ |
| 75th | $-3.2 \%$ | $-5.1 \%$ | $-3.3 \%$ | $-4.4 \%$ |
| 90th | $-6.4 \%$ | $-7.4 \%$ | $-4.5 \%$ | $-5.9 \%$ |
| 95th | $-8.0 \%$ | $-8.7 \%$ | $-5.3 \%$ | $-6.0 \%$ |
| 97th | $-9.1 \%$ | $-9.5 \%$ | $-5.7 \%$ | $-6.0 \%$ |
| 98th | $-9.9 \%$ | $-10.0 \%$ | $-6.0 \%$ | $-6.1 \%$ |
| 99th | $-11.0 \%$ | $-11.0 \%$ | $-6.6 \%$ | $-6.1 \%$ |
| Average | $0.4 \%$ | $-2.3 \%$ | $-1.4 \%$ | $-0.5 \%$ |
| Standard Deviation | $5.2 \%$ | $4.1 \%$ | $2.8 \%$ | $4.5 \%$ |

Table 20 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $3.8 \%$ | $0.3 \%$ | $0.0 \%$ | $2.3 \%$ |
| 50th | $0.3 \%$ | $-2.5 \%$ | $-1.8 \%$ | $-1.1 \%$ |
| 75th | $-3.3 \%$ | $-5.2 \%$ | $-3.4 \%$ | $-4.5 \%$ |
| 90th | $-6.5 \%$ | $-7.5 \%$ | $-4.6 \%$ | $-6.0 \%$ |
| 95th | $-8.3 \%$ | $-8.8 \%$ | $-5.4 \%$ | $-6.1 \%$ |
| 97th | $-9.4 \%$ | $-9.7 \%$ | $-5.8 \%$ | $-6.1 \%$ |
| 98th | $-10.1 \%$ | $-10.3 \%$ | $-6.1 \%$ | $-6.2 \%$ |
| 99th | $-11.3 \%$ | $-11.4 \%$ | $-6.6 \%$ | $-6.2 \%$ |
| Average | $0.4 \%$ | $-2.3 \%$ | $-1.5 \%$ | $-0.5 \%$ |
| Standard Deviation | $5.4 \%$ | $4.2 \%$ | $2.9 \%$ | $4.6 \%$ |

Table 21 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.0 \%$ | $-2.7 \%$ | $-3.7 \%$ | $-2.3 \%$ |
| 50th | $-2.6 \%$ | $-5.4 \%$ | $-5.1 \%$ | $-5.6 \%$ |
| 75th | $-6.1 \%$ | $-8.0 \%$ | $-6.5 \%$ | $-7.5 \%$ |
| 90th | $-8.9 \%$ | $-10.2 \%$ | $-7.7 \%$ | $-7.9 \%$ |
| 95th | $-10.6 \%$ | $-11.5 \%$ | $-8.4 \%$ | $-8.0 \%$ |
| 97th | $-11.6 \%$ | $-12.2 \%$ | $-8.8 \%$ | $-8.1 \%$ |
| 98th | $-12.2 \%$ | $-12.7 \%$ | $-9.0 \%$ | $-8.2 \%$ |
| 99th | $-13.2 \%$ | $-13.5 \%$ | $-9.6 \%$ | $-8.3 \%$ |
| Average | $-2.4 \%$ | $-5.3 \%$ | $-4.9 \%$ | $-4.4 \%$ |
| Standard Deviation | $5.2 \%$ | $4.0 \%$ | $2.5 \%$ | $3.7 \%$ |

Table 22 - Distribution of Outcomes (\% of Med. FFS Costs

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.5 \%$ | $-1.5 \%$ | $-0.9 \%$ | $1.5 \%$ |
| 50th | $0.0 \%$ | $-2.6 \%$ | $-1.5 \%$ | $0.0 \%$ |
| 75th | $-1.4 \%$ | $-3.7 \%$ | $-2.1 \%$ | $-1.5 \%$ |
| 90th | $-2.8 \%$ | $-4.6 \%$ | $-2.6 \%$ | $-2.8 \%$ |
| 95th | $-3.6 \%$ | $-5.2 \%$ | $-2.9 \%$ | $-3.7 \%$ |
| 97th | $-4.1 \%$ | $-5.6 \%$ | $-3.1 \%$ | $-4.2 \%$ |
| 98th | $-4.6 \%$ | $-5.8 \%$ | $-3.2 \%$ | $-4.6 \%$ |
| 99th | $-5.5 \%$ | $-6.1 \%$ | $-3.4 \%$ | $-4.8 \%$ |
| Average | $0.0 \%$ | $-2.5 \%$ | $-1.5 \%$ | $0.0 \%$ |
| Standard Deviation | $2.2 \%$ | $1.6 \%$ | $0.9 \%$ | $2.2 \%$ |

Table 23 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.7 \%$ | $-1.3 \%$ | $-0.8 \%$ | $1.6 \%$ |
| 50th | $0.0 \%$ | $-2.6 \%$ | $-1.5 \%$ | $-0.1 \%$ |
| 75th | $-1.6 \%$ | $-3.8 \%$ | $-2.1 \%$ | $-1.7 \%$ |
| 90th | $-3.0 \%$ | $-4.9 \%$ | $-2.7 \%$ | $-3.1 \%$ |
| 95th | $-4.0 \%$ | $-5.5 \%$ | $-3.0 \%$ | $-4.0 \%$ |
| 97th | $-4.5 \%$ | $-5.9 \%$ | $-3.2 \%$ | $-4.6 \%$ |
| 98th | $-5.0 \%$ | $-6.2 \%$ | $-3.4 \%$ | $-4.8 \%$ |
| 99th | $-5.8 \%$ | $-6.7 \%$ | $-3.6 \%$ | $-4.8 \%$ |
| Average | $0.0 \%$ | $-2.5 \%$ | $-1.4 \%$ | $0.0 \%$ |
| Standard Deviation | $2.5 \%$ | $1.9 \%$ | $1.0 \%$ | $2.4 \%$ |


| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $-1.2 \%$ | $-4.3 \%$ | $-4.5 \%$ | $-1.9 \%$ |
| 50th | $-2.8 \%$ | $-5.5 \%$ | $-5.1 \%$ | $-3.5 \%$ |
| 75th | $-4.3 \%$ | $-6.7 \%$ | $-5.6 \%$ | $-5.0 \%$ |
| 90th | $-5.7 \%$ | $-7.7 \%$ | $-6.2 \%$ | $-5.4 \%$ |
| 95th | $-6.6 \%$ | $-8.3 \%$ | $-6.5 \%$ | $-5.4 \%$ |
| 97th | $-7.2 \%$ | $-8.7 \%$ | $-6.7 \%$ | $-5.5 \%$ |
| 98th | $-7.6 \%$ | $-9.0 \%$ | $-6.8 \%$ | $-5.5 \%$ |
| 99th | $-8.4 \%$ | $-9.5 \%$ | $-7.0 \%$ | $-5.5 \%$ |
| Average | $-2.8 \%$ | $-5.5 \%$ | $-5.0 \%$ | $-3.2 \%$ |
| Standard Deviation | $2.4 \%$ | $1.8 \%$ | $0.9 \%$ | $2.0 \%$ |


| Table Number | Practice Size | Mispricing Scenario | Winsorization | Hospital Affiliation | Risk Model |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 25 | Small | Unbiased, Accurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 26 | Small | Unbiased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 27 | Small | Biased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 28 | Large | Unbiased, Accurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 29 | Large | Unbiased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |
| 30 | Large | Biased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | One-Sided |

Table 25 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25 th | $4.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50 th | $2.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75 th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |  |
| Standard Deviation | $3.8 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
|  | $3.0 \%$ |  |  |  |

Table 26 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $4.5 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50 th | $2.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $2.8 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $3.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 27 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.9 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $1.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $2.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 28 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.8 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $0.8 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $1.1 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $1.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 29 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.9 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $0.8 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $1.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $1.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 30 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $0.1 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $0.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |


| Table Number | Practice Size | Mispricing Scenario | Winsorization | Hospital Affiliation | Risk Model |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | Small | Unbiased, Accurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 32 | Small | Unbiased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 33 | Small | Biased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 34 | Large | Unbiased, Accurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 35 | Large | Unbiased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |
| 36 | Large | Biased, Inaccurate | 5th/95th Percentile | Non-Hosp. Affiliated | Two-Sided |

Table 31 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $3.4 \%$ | $1.0 \%$ | $-0.1 \%$ | $2.4 \%$ |
| 50th | $0.0 \%$ | $-1.9 \%$ | $-1.7 \%$ | $-0.9 \%$ |
| 75th | $-3.1 \%$ | $-4.6 \%$ | $-3.2 \%$ | $-4.0 \%$ |
| 90th | $-5.7 \%$ | $-6.9 \%$ | $-4.3 \%$ | $-5.3 \%$ |
| 95th | $-7.2 \%$ | $-8.1 \%$ | $-5.0 \%$ | $-5.5 \%$ |
| 97th | $-8.2 \%$ | $-8.9 \%$ | $-5.4 \%$ | $-5.5 \%$ |
| 98th | $-8.8 \%$ | $-9.5 \%$ | $-5.8 \%$ | $-5.5 \%$ |
| 99th | $-9.8 \%$ | $-10.4 \%$ | $-6.2 \%$ | $-5.6 \%$ |
| Average | $0.2 \%$ | $-1.7 \%$ | $-1.4 \%$ | $-0.4 \%$ |
| Standard Deviation | $4.7 \%$ | $4.1 \%$ | $2.5 \%$ | $4.2 \%$ |

Table 32 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $3.5 \%$ | $1.1 \%$ | $-0.1 \%$ | $2.3 \%$ |
| 50th | $0.0 \%$ | $-2.0 \%$ | $-1.8 \%$ | $-1.1 \%$ |
| 75th | $-3.2 \%$ | $-4.6 \%$ | $-3.2 \%$ | $-4.2 \%$ |
| 90th | $-5.8 \%$ | $-7.0 \%$ | $-4.4 \%$ | $-5.4 \%$ |
| 95th | $-7.4 \%$ | $-8.3 \%$ | $-5.1 \%$ | $-5.5 \%$ |
| 97th | $-8.4 \%$ | $-9.3 \%$ | $-5.6 \%$ | $-5.6 \%$ |
| 98th | $-9.1 \%$ | $-9.9 \%$ | $-5.9 \%$ | $-5.6 \%$ |
| 99th | $-10.4 \%$ | $-10.8 \%$ | $-6.4 \%$ | $-5.7 \%$ |
| Average | $0.3 \%$ | $-1.7 \%$ | $-1.5 \%$ | $-0.4 \%$ |
| Standard Deviation | $4.9 \%$ | $4.2 \%$ | $2.6 \%$ | $4.3 \%$ |

Table 33 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $0.5 \%$ | $-2.1 \%$ | $-3.6 \%$ | $-2.4 \%$ |
| 50th | $-2.7 \%$ | $-4.8 \%$ | $-5.1 \%$ | $-5.4 \%$ |
| 75th | $-5.7 \%$ | $-7.4 \%$ | $-6.4 \%$ | $-6.9 \%$ |
| 90th | $-8.3 \%$ | $-9.6 \%$ | $-7.5 \%$ | $-7.2 \%$ |
| 95th | $-9.8 \%$ | $-10.8 \%$ | $-8.1 \%$ | $-7.4 \%$ |
| 97th | $-10.6 \%$ | $-11.6 \%$ | $-8.5 \%$ | $-7.5 \%$ |
| 98th | $-11.2 \%$ | $-12.1 \%$ | $-8.8 \%$ | $-7.5 \%$ |
| 99th | $-12.2 \%$ | $-12.9 \%$ | $-9.2 \%$ | $-7.6 \%$ |
| Average | $-2.5 \%$ | $-4.7 \%$ | $-4.9 \%$ | $-4.2 \%$ |
| Standard Deviation | $4.7 \%$ | $3.9 \%$ | $2.1 \%$ | $3.4 \%$ |

Table 34 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.3 \%$ | $-0.7 \%$ | $-0.8 \%$ | $1.3 \%$ |
| 50th | $0.0 \%$ | $-1.9 \%$ | $-1.5 \%$ | $0.0 \%$ |
| 75th | $-1.3 \%$ | $-3.0 \%$ | $-2.1 \%$ | $-1.3 \%$ |
| 90th | $-2.5 \%$ | $-4.0 \%$ | $-2.5 \%$ | $-2.5 \%$ |
| 95th | $-3.1 \%$ | $-4.5 \%$ | $-2.8 \%$ | $-3.1 \%$ |
| 97th | $-3.4 \%$ | $-4.9 \%$ | $-3.0 \%$ | $-3.4 \%$ |
| 98th | $-3.7 \%$ | $-5.1 \%$ | $-3.1 \%$ | $-3.7 \%$ |
| 99th | $-4.3 \%$ | $-5.6 \%$ | $-3.4 \%$ | $-4.3 \%$ |
| Average | $0.0 \%$ | $-1.9 \%$ | $-1.4 \%$ | $0.0 \%$ |
| Standard Deviation | $1.9 \%$ | $1.7 \%$ | $0.9 \%$ | $1.9 \%$ |

Table 35 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.5 \%$ | $-0.6 \%$ | $-0.8 \%$ | $1.5 \%$ |
| 50th | $0.0 \%$ | $-1.9 \%$ | $-1.4 \%$ | $0.0 \%$ |
| 75th | $-1.4 \%$ | $-3.1 \%$ | $-2.1 \%$ | $-1.5 \%$ |
| 90th | $-2.7 \%$ | $-4.2 \%$ | $-2.6 \%$ | $-2.8 \%$ |
| 95th | $-3.5 \%$ | $-4.8 \%$ | $-2.9 \%$ | $-3.5 \%$ |
| 97th | $-4.0 \%$ | $-5.3 \%$ | $-3.1 \%$ | $-4.0 \%$ |
| 98th | $-4.3 \%$ | $-5.6 \%$ | $-3.3 \%$ | $-4.4 \%$ |
| 99th | $-5.0 \%$ | $-6.1 \%$ | $-3.5 \%$ | $-4.5 \%$ |
| Average | $0.1 \%$ | $-1.9 \%$ | $-1.4 \%$ | $0.0 \%$ |
| Standard Deviation | $2.2 \%$ | $1.9 \%$ | $1.0 \%$ | $2.2 \%$ |

Table 36 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $-1.2 \%$ | $-3.5 \%$ | $-4.2 \%$ | $-1.7 \%$ |
| 50th | $-2.6 \%$ | $-4.7 \%$ | $-4.8 \%$ | $-3.2 \%$ |
| 75th | $-4.1 \%$ | $-5.9 \%$ | $-5.4 \%$ | $-4.6 \%$ |
| 90th | $-5.3 \%$ | $-6.9 \%$ | $-5.9 \%$ | $-5.0 \%$ |
| 95th | $-6.1 \%$ | $-7.6 \%$ | $-6.2 \%$ | $-5.1 \%$ |
| 97th | $-6.6 \%$ | $-8.0 \%$ | $-6.4 \%$ | $-5.1 \%$ |
| 98th | $-6.9 \%$ | $-8.2 \%$ | $-6.5 \%$ | $-5.1 \%$ |
| 99th | $-7.3 \%$ | $-8.6 \%$ | $-6.8 \%$ | $-5.1 \%$ |
| Average | $-2.6 \%$ | $-4.7 \%$ | $-4.8 \%$ | $-2.9 \%$ |
| Standard Deviation | $2.1 \%$ | $1.8 \%$ | $0.9 \%$ | $1.8 \%$ |


| Table Number | Practice Size | Mispricing Scenario | Winsorization | Hospital Affiliation | Risk Model |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 37 | Small | Unbiased, Accurate | None | Non-Hosp. Affiliated | One-Sided |
| 38 | Small | Unbiased, Inaccurate | None | Non-Hosp. Affiliated | One-Sided |
| 39 | Small | Biased, Inaccurate | None | Non-Hosp. Affiliated | One-Sided |
| 40 | Large | Unbiased, Accurate | None | Non-Hosp. Affiliated | One-Sided |
| 41 | Large | Unbiased, Inaccurate | None | Non-Hosp. Affiliated | One-Sided |
| 42 | Large | Biased, Inaccurate | None | Non-Hosp. Affiliated | One-Sided |

Table 37 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25 th | $5.1 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50 th | $2.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75 th | $0.1 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $3.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $3.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 38 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $5.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $2.5 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $3.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $3.5 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 39 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $2.6 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $0.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $1.6 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $2.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 40 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25 th | $2.1 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $1.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $1.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $1.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 41 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $2.3 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $1.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $1.4 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $1.5 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |

Table 42 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 50th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 75th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 90th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 95th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 97th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 98th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| 99th | $0.0 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Average | $0.2 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |
| Standard Deviation | $0.5 \%$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ | $\mathrm{n} / \mathrm{a}$ |


| Table Number | Practice Size | Mispricing Scenario | Winsorization | Hospital Affiliation | Risk Model |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 43 | Small | Unbiased, Accurate | None | Non-Hosp. Affiliated | Two-Sided |
| 44 | Small | Unbiased, Inaccurate | None | Non-Hosp. Affiliated | Two-Sided |
| 45 | Small | Biased, Inaccurate | None | Non-Hosp. Affiliated | Two-Sided |
| 46 | Large | Unbiased, Accurate | None | Non-Hosp. Affiliated | Two-Sided |
| 47 | Large | Unbiased, Inaccurate | None | Non-Hosp. Affiliated | Two-Sided |
| 48 | Large | Biased, Inaccurate | None | Non-Hosp. Affiliated | Two-Sided |

Table 43 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $4.0 \%$ | $0.0 \%$ | $-0.8 \%$ | $2.4 \%$ |
| 50th | $0.2 \%$ | $-2.8 \%$ | $-2.5 \%$ | $-1.3 \%$ |
| 75th | $-3.6 \%$ | $-5.6 \%$ | $-4.0 \%$ | $-4.9 \%$ |
| 90th | $-6.7 \%$ | $-8.0 \%$ | $-5.2 \%$ | $-6.1 \%$ |
| 95th | $-8.4 \%$ | $-9.3 \%$ | $-5.9 \%$ | $-6.2 \%$ |
| 97th | $-9.6 \%$ | $-10.2 \%$ | $-6.4 \%$ | $-6.2 \%$ |
| 98th | $-10.4 \%$ | $-10.6 \%$ | $-6.7 \%$ | $-6.3 \%$ |
| 99th | $-11.8 \%$ | $-11.6 \%$ | $-7.2 \%$ | $-6.3 \%$ |
| Average | $0.3 \%$ | $-2.7 \%$ | $-2.2 \%$ | $-0.6 \%$ |
| Standard Deviation | $5.6 \%$ | $4.2 \%$ | $2.5 \%$ | $4.7 \%$ |

Table 44 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $4.1 \%$ | $0.0 \%$ | $-0.6 \%$ | $2.4 \%$ |
| 50th | $0.3 \%$ | $-2.9 \%$ | $-2.4 \%$ | $-1.4 \%$ |
| 75th | $-3.5 \%$ | $-5.7 \%$ | $-3.9 \%$ | $-4.9 \%$ |
| 90th | $-6.9 \%$ | $-8.1 \%$ | $-5.2 \%$ | $-6.2 \%$ |
| 95th | $-8.8 \%$ | $-9.5 \%$ | $-6.0 \%$ | $-6.3 \%$ |
| 97th | $-9.9 \%$ | $-10.3 \%$ | $-6.4 \%$ | $-6.3 \%$ |
| 98th | $-10.7 \%$ | $-11.0 \%$ | $-6.8 \%$ | $-6.4 \%$ |
| 99th | $-11.8 \%$ | $-11.9 \%$ | $-7.3 \%$ | $-6.4 \%$ |
| Average | $0.4 \%$ | $-2.7 \%$ | $-2.1 \%$ | $-0.7 \%$ |
| Standard Deviation | $5.7 \%$ | $4.3 \%$ | $2.6 \%$ | $4.8 \%$ |

Table 45 - Distribution of Outcomes (\% of Med. FFS Costs)

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.2 \%$ | $-3.1 \%$ | $-4.3 \%$ | $-2.5 \%$ |
| 50th | $-2.7 \%$ | $-5.9 \%$ | $-5.8 \%$ | $-5.9 \%$ |
| 75th | $-6.2 \%$ | $-8.5 \%$ | $-7.2 \%$ | $-7.8 \%$ |
| 90th | $-9.3 \%$ | $-10.7 \%$ | $-8.4 \%$ | $-8.1 \%$ |
| 95th | $-10.9 \%$ | $-12.0 \%$ | $-9.0 \%$ | $-8.3 \%$ |
| 97th | $-11.9 \%$ | $-12.7 \%$ | $-9.5 \%$ | $-8.4 \%$ |
| 98th | $-12.6 \%$ | $-13.3 \%$ | $-9.9 \%$ | $-8.5 \%$ |
| 99th | $-13.7 \%$ | $-14.2 \%$ | $-10.4 \%$ | $-8.6 \%$ |
| Average | $-2.4 \%$ | $-5.7 \%$ | $-5.6 \%$ | $-4.6 \%$ |
| Standard Deviation | $5.4 \%$ | $4.0 \%$ | $2.3 \%$ | $3.8 \%$ |

Table 46 - Distribution of Outcomes (\% of Med. FFS Costs

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.6 \%$ | $-1.7 \%$ | $-1.5 \%$ | $1.6 \%$ |
| 50th | $0.1 \%$ | $-2.9 \%$ | $-2.1 \%$ | $0.0 \%$ |
| 75th | $-1.5 \%$ | $-4.0 \%$ | $-2.7 \%$ | $-1.5 \%$ |
| 90th | $-2.8 \%$ | $-5.0 \%$ | $-3.3 \%$ | $-2.8 \%$ |
| 95th | $-3.6 \%$ | $-5.5 \%$ | $-3.6 \%$ | $-3.7 \%$ |
| 97th | $-4.2 \%$ | $-5.9 \%$ | $-3.7 \%$ | $-4.2 \%$ |
| 98th | $-4.6 \%$ | $-6.2 \%$ | $-3.9 \%$ | $-4.6 \%$ |
| 99th | $-5.2 \%$ | $-6.6 \%$ | $-4.1 \%$ | $-4.8 \%$ |
| Average | $0.1 \%$ | $-2.8 \%$ | $-2.1 \%$ | $0.1 \%$ |
| Standard Deviation | $2.3 \%$ | $1.7 \%$ | $0.9 \%$ | $2.3 \%$ |

Table 47 - Distribution of Outcomes (\% of Med. FFS Costs

| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $1.7 \%$ | $-1.7 \%$ | $-1.6 \%$ | $1.7 \%$ |
| 50th | $0.0 \%$ | $-3.0 \%$ | $-2.3 \%$ | $-0.1 \%$ |
| 75th | $-1.7 \%$ | $-4.3 \%$ | $-2.9 \%$ | $-1.8 \%$ |
| 90th | $-3.3 \%$ | $-5.4 \%$ | $-3.5 \%$ | $-3.4 \%$ |
| 95th | $-4.2 \%$ | $-6.1 \%$ | $-3.9 \%$ | $-4.3 \%$ |
| 97th | $-4.9 \%$ | $-6.5 \%$ | $-4.1 \%$ | $-4.7 \%$ |
| 98th | $-5.2 \%$ | $-6.8 \%$ | $-4.2 \%$ | $-4.8 \%$ |
| 99th | $-5.9 \%$ | $-7.2 \%$ | $-4.4 \%$ | $-4.8 \%$ |
| Average | $0.0 \%$ | $-2.9 \%$ | $-2.2 \%$ | $0.0 \%$ |
| Standard Deviation | $2.6 \%$ | $1.9 \%$ | $1.0 \%$ | $2.5 \%$ |


| Outcome <br> Percentile | Without <br> Reinsurance | Specific <br> Reinsurance | Agg. Spec. <br> Reinsurance | Aggregate <br> Reinsurance |
| :--- | :---: | :---: | :---: | :---: |
| 25th | $-1.1 \%$ | $-4.7 \%$ | $-5.1 \%$ | $-1.9 \%$ |
| 50th | $-2.8 \%$ | $-5.9 \%$ | $-5.8 \%$ | $-3.5 \%$ |
| 75th | $-4.4 \%$ | $-7.1 \%$ | $-6.4 \%$ | $-5.2 \%$ |
| 90th | $-5.9 \%$ | $-8.2 \%$ | $-7.0 \%$ | $-5.5 \%$ |
| 95th | $-6.8 \%$ | $-8.8 \%$ | $-7.3 \%$ | $-5.5 \%$ |
| 97th | $-7.4 \%$ | $-9.2 \%$ | $-7.5 \%$ | $-5.5 \%$ |
| 98th | $-7.8 \%$ | $-9.5 \%$ | $-7.7 \%$ | $-5.5 \%$ |
| 99th | $-8.5 \%$ | $-10.0 \%$ | $-7.9 \%$ | $-5.5 \%$ |
| Average | $-2.7 \%$ | $-5.9 \%$ | $-5.8 \%$ | $-3.2 \%$ |
| Standard Deviation | $2.5 \%$ | $1.8 \%$ | $0.9 \%$ | $2.0 \%$ |

## Appendix B: Episode-Initiating HCPCS Codes

| HCPCS | Generic Drug Name |
| :--- | :--- |
| C9131 | ADO-TRASTUZUMAB EMTANSINE |
| J9354 | ADO-TRASTUZUMAB EMTANSINE |
| J9015 | ALDESLEUKIN |
| J0202 | ALEMTUZUMAB |
| J9010 | ALEMTUZUMAB |
| Q9979 | ALEMTUZUMAB |
| J9999 | ANTINEO, NOC |
| J8999 | ANTINEO, NOC |
| J7504 | ANTITHYMOCYTE GLOBULIN, EQUINE |
| J7511 | ANTITHYMOCYTE GLOBULIN, RABBIT |
| J9017 | ARSENIC TRIOXIDE |
| J9020 | ASPARAGINASE |
| C9289 | ASPARAGINASE ERWINIA |
| J9019 | ASPARAGINASE ERWINIA |
| C9483 | ATEZOLIZUMAB |
| J9022 | ATEZOLIZUMAB |
| J9023 | AVELUMAB |
| C9491 | AVELUMAB |
| J9025 | AZACITIDINE |
| J9031 | BCG (INTRAVESICAL) PER INSTILLATION |
| C9442 | BELINOSTAT |
| J9032 | BELINOSTAT |
| J9033 | BENDAMUSTINE |
| J9034 | BENDAMUSTINE |
| J9035 | BEVACIZUMAB |
| J9040 | BLEOMYCIN SULFATE |
| C9449 | BLINATUMOMAB |
| J9039 | BLINATUMOMAB |
| J9041 | BORTEZOMIB |
| C9287 | BRENTUXIMAB VEDOTIN |
| J9042 | BRENTUXIMAB VEDOTIN |
| J0594 | BUSULFAN |
| J8510 | BUSULFAN |
| WW020 | BUSULFAN |
| J9043 | CABAZITAXEL |
| J8520 | CAPECITABINE |
| J8521 | CAPECITABINE |
| WW089 | CAPECITABINE |
| WW090 | CAPECITABINE |
| WW091 | CAPECITABINE |
| WW093 | CAPECITABINE |
| WW094 | CAPECITABINE |
| WW096 | CAPECITABINE |
| J9045 | CARBOPLATIN |
| C9295 | CARFILZOMIB |
| J9047 | CARFILZOMIB |
| J9050 | CARMUSTINE |
| J90653 | CETUXIMAB |
| C9065 | CISPLATIN |
| CLADRATIN |  |
| CYCLOPHBINE |  |


| HCPCS | Generic Drug Name |
| :---: | :---: |
| J9070 | CYCLOPHOSPHAMIDE |
| J9080 | CYCLOPHOSPHAMIDE |
| J9090 | CYCLOPHOSPHAMIDE |
| J9091 | CYCLOPHOSPHAMIDE |
| J9092 | CYCLOPHOSPHAMIDE |
| J9093 | CYCLOPHOSPHAMIDE |
| J9094 | CYCLOPHOSPHAMIDE |
| J9095 | CYCLOPHOSPHAMIDE |
| J9096 | CYCLOPHOSPHAMIDE |
| J9097 | CYCLOPHOSPHAMIDE |
| J9100 | CYTARABINE |
| J9098 | CYTARABINE, LIPOSOMAL |
| J9130 | DACARBAZINE |
| J9140 | DACARBAZINE |
| J9120 | DACTINOMYCIN |
| J9145 | DARATUMUMAB |
| C9476 | DARATUMUMAB |
| J9150 | DAUNORUBICIN |
| J9151 | DAUNORUBICIN, LIPOSOMAL |
| C9024 | DAUNORUBICIN AND CYTARABINE |
| J0894 | DECITABINE |
| J9155 | DEGARELIX |
| J9160 | DENILEUKIN DIFTITOX |
| J9170 | DOCETAXEL |
| J9171 | DOCETAXEL |
| J9000 | DOXORUBICIN |
| J9001 | DOXORUBICIN, LIPOSOMAL |
| J9002 | DOXORUBICIN, LIPOSOMAL |
| Q2049 | DOXORUBICIN, LIPOSOMAL |
| Q2048 | DOXORUBICIN, LIPOSOMAL |
| Q2050 | DOXORUBICIN, LIPOSOMAL |
| C9492 | DURVALUMAB |
| J9176 | ELOTUZUMAB |
| C9477 | ELOTUZUMAB |
| J9178 | EPIRUBICIN |
| J9179 | ERIBULIN |
| J8560 | ETOPOSIDE |
| J9181 | ETOPOSIDE |
| WW030 | ETOPOSIDE |
| WW031 | ETOPOSIDE |
| WW032 | ETOPOSIDE |
| J9182 | ETOPOSIDE |
| J9200 | FLOXURIDINE |
| J9185 | FLUDARABINE |
| J8562 | FLUDARABINE, ORAL |
| J9190 | FLUOROURACIL |
| J9395 | FULVESTRANT |
| J8565 | GEFITINIB |
| J9201 | GEMCITABINE |
| J9300 | GEMTUZUMAB OZOGAMICIN |
| J9203 | GEMTUZUMAB OZOGAMICIN |
| J9202 | GOSERELIN |
| J1675 | HISTRELIN |


| HCPCS | Generic Drug Name |
| :--- | :--- |
| J9225 | HISTRELIN |
| A9543 | IBRITUMOMAB |
| J9211 | IDARUBICIN |
| J9208 | IFOSFAMIDE |
| C9028 | INOTUZUMAB OZOGAMICIN |
| J9216 | INTERFERON, GAMMA 1-B |
| J9228 | IPILIMUMAB |
| J9206 | IRINOTECAN |
| C9474 | IRINOTECAN, LIPOSOMAL |
| J9205 | IRINOTECAN, LIPOSOMAL |
| J9207 | IXABEPILONE |
| J1930 | LANREOTIDE |
| J1950 | LEUPROLIDE |
| J9217 | LEUPROLIDE |
| J9218 | LEUPROLIDE |
| J9219 | LEUPROLIDE |
| J9230 | MECHLORETHAMINE |
| J8600 | MELPHALAN |
| J9245 | MELPHALAN |
| WW080 | MELPHALAN |
| WW081 | MELPHALAN |
| J9280 | MITOMYCIN |
| J9290 | MITOMYCIN |
| J9291 | MITOMYCIN |
| J9293 | MITOXANTRONE |
| J9295 | NECITUMUMAB |
| C9475 | NECITUMUMAB |
| J9261 | NELARABINE |
| C9453 | NIVOLUMAB |
| J9299 | NIVOLUMAB |
| C9021 | OBINUTUZUMAB |
| J9301 | OBINUTUZUMAB |
| $J 2353$ | OCTREOTIDE |
| J9302 | OFATUMUMAB |
| $J 9285 ~$ | OLARATUMAB |
| C9485 | OLARATUMAB |
| C9297 | OMACETAXINE |
| J9262 | OMACETAXINE |
| J9263 | OXALIPLATIN |
| J9265 | PACLITAXEL |
| $J 9267$ | PACLITAXEL |
| J9264 | PACLITAXEL, PROTEIN-BOUND |
| PANITUMUMAB |  |
| PEGASPARGASE |  |
| PEMBROLIZUMAB |  |
| PEMETREXED |  |


| HCPCS | Generic Drug Name |
| :--- | :--- |
| J9268 | PENTOSTATIN |
| C9292 | PERTUZUMAB |
| J9306 | PERTUZUMAB |
| J9307 | PRALATREXATE |
| C9025 | RAMUCIRUMAB |
| J9308 | RAMUCIRUMAB |
| J9310 | RITUXIMAB |
| J9315 | ROMIDEPSIN |
| C9455 | SILTUXIMAB |
| J2860 | SILTUXIMAB |
| Q2043 | SIPULEUCEL-T |
| J9320 | STREPTOZOCIN |
| J9325 | TALIMOGENE LAHERPAREPVEC |
| C9472 | TALIMOGENE LAHERPAREPVEC |
| J8700 | TEMOZOLOMIDE |
| J9328 | TEMOZOLOMIDE |
| WW002 | TEMOZOLOMIDE |
| WW003 | TEMOZOLOMIDE |
| WW004 | TEMOZOLOMIDE |
| WW005 | TEMOZOLOMIDE |
| WW006 | TEMOZOLOMIDE |
| WW007 | TEMOZOLOMIDE |
| WW008 | TEMOZOLOMIDE |
| WW009 | TEMOZOLOMIDE |
| J9330 | TEMSIROLIMUS |
| Q2017 | TENIPOSIDE |
| J9340 | THIOTEPA |
| J8705 | TOPOTECAN |
| J9350 | TOPOTECAN |
| $J 9351$ | TOPOTECAN |
| WW140 | TOPOTECAN |
| A9545 | TOSITUMOMAB |
| J9352 | TRABECTEDIN |
| C9480 | TRABECTEDIN |
| $J 9355 ~$ | TRASTUZUMAB |
| C9016 | TRIPTORELIN |
| J3315 | TRIPTORELIN |
| J9357 | VALRUBICIN |
| $J 9360 ~$ | VINBLASTINE |
| J9370 | VINCRISTINE |
| J9375 | VINCRISTINE |
| J9380 | VINCRISTINE |
| J9371 | VINCRISTINE, LIPOSOMAL |
| C9390 | VINORELBINE |
| J9400 | ZIV-AFLIBERCEPT |
|  | ZIV-AFLIBERCEPT |

## Appendix C: Episode-Initiating NDC Codes

| NDC Code | Generic Drug Name |
| :--- | :--- |
| 578940150 | ABIRATERONE |
| 578940184 | ABIRATERONE |
| 578940195 | ABIRATERONE |
| 502420087 | ADO-TRASTUZUMAB EMTANSINE |
| 502420088 | ADO-TRASTUZUMAB EMTANSINE |
| 005970137 | AFATINIB |
| 005970138 | AFATINIB |
| 005970141 | AFATINIB |
| 000024483 | ABEMACICLIB |
| 000024815 | ABEMACICLIB |
| 000025337 | ABEMACICLIB |
| 000026216 | ABEMACICLIB |
| 003100512 | ACALABRUTINIB |
| 000780495 | ALDESLEUKIN |
| 170890380 | ALDESLEUKIN |
| 654830116 | ALDESLEUKIN |
| 548685596 | ALDESLEUKIN |
| 502420130 | ALECTINIB |
| 584680200 | ALEMTUZUMAB |
| 584680357 | ALEMTUZUMAB |
| 504190357 | ALEMTUZUMAB |
| 628560001 | ALTRETAMINE |
| 000540164 | ANASTROZOLE |
| 000937536 | ANASTROZOLE |
| 001790068 | ANASTROZOLE |
| 003100201 | ANASTROZOLE |
| 003786034 | ANASTROZOLE |
| 007815356 | ANASTROZOLE |
| 009046195 | ANASTROZOLE |
| 009046229 | ANASTROZOLE |
| 165710421 | ANASTROZOLE |
| 167290035 | ANASTROZOLE |
| 216950990 | ANASTROZOLE |
| 420430180 | ANASTROZOLE |
| 422540161 | ANASTROZOLE |
| 430630383 | ANASTROZOLE |
| 510790323 | ANASTROZOLE |
| 516550638 | ANASTROZOLE |
| 519910620 | ANASTROZOLE |
| 545696198 | ANASTROZOLE |
| 500901193 | ANASTROZOLE |
| 500901918 | ANASTROZOLE |
| 500902005 | ANASTROZOLE |
| 500902118 | ANASTROZOLE |
| 500902453 | ANASTROZOLE |
| 548685000 | ANASTROZOLE |
| 548686130 | ANASTROZOLE |
| 551110647 | ANASTROZOLE |
| 602580866 | ANASTROZOLE |
| 604290286 | ANASTROZOLE |
| 605052985 | ANASTROZOLE |
| 606870112 | ANASTROZOLE |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 607630376 | ANASTROZOLE |
| 621750710 | ANASTROZOLE |
| 627560250 | ANASTROZOLE |
| 631870080 | ANASTROZOLE |
| 633230129 | ANASTROZOLE |
| 636295269 | ANASTROZOLE |
| 636720015 | ANASTROZOLE |
| 658410743 | ANASTROZOLE |
| 663360533 | ANASTROZOLE |
| 664350415 | ANASTROZOLE |
| 678770171 | ANASTROZOLE |
| 680010155 | ANASTROZOLE |
| 680840448 | ANASTROZOLE |
| 683820209 | ANASTROZOLE |
| 691890035 | ANASTROZOLE |
| 620330376 | ANASTROZOLE |
| 422910105 | ANASTROZOLE |
| 001151261 | ANASTROZOLE |
| 638500010 | ANASTROZOLE |
| 163640035 | ANASTROZOLE |
| 687886774 | ANASTROZOLE |
| 680711682 | ANASTROZOLE |
| 584680080 | ANTI-THYMOCYTE GLOBULIN, RABBIT |
| 002200522 | ARSENIC TRIOXIDE |
| 101911989 | ARSENIC TRIOXIDE |
| 549730605 | ARSENIC TRIOXIDE |
| 549732905 | ARSENIC TRIOXIDE |
| 621064878 | ARSENIC TRIOXIDE |
| 634590600 | ARSENIC TRIOXIDE |
| 684280033 | ARSENIC TRIOXIDE |
| 684280083 | ARSENIC TRIOXIDE |
| 684280225 | ARSENIC TRIOXIDE |
| 764721132 | ARSENIC TRIOXIDE |
| 611260517 | ARSENIC TRIOXIDE |
| 579020249 | ASPARAGINASE |
| 673860411 | ASPARAGINASE |
| 502420917 | ATEZOLIZUMAB |
| 440873535 | AVELUMAB |
| 000690145 | AXITINIB |
| 000690151 | AXITINIB |
| 635390026 | AXITINIB |
| 635390044 | AXITINIB |
| 538692323 | AXITINIB |
| 538690262 | AXITINIB |
| 005912897 | AZACITIDINE |
| 007813253 | AZACITIDINE |
| 007819253 | AZACITIDINE |
| 435980305 | AZACITIDINE |
| 435980465 | AZACITIDINE |
| 595720102 | AZACITIDINE |
| 633230771 | AZACITIDINE |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 637590003 | AZACITIDINE |
| 646790096 | AZACITIDINE |
| 674570254 | AZACITIDINE |
| 690970346 | AZACITIDINE |
| 690970359 | AZACITIDINE |
| 139250523 | AZACITIDINE |
| 519910797 | AZACITIDINE |
| 680010313 | AZACITIDINE |
| 000520602 | BCG (BACILLUS CALMETTEGUERIN) LIVE VAX, INTRAVESICAL |
| 492810880 | BCG (BACILLUS CALMETTEGUERIN) LIVE VAX, INTRAVESICAL |
| 681520108 | BELINOSTAT |
| 634590348 | BENDAMUSTINE |
| 634590395 | BENDAMUSTINE |
| 634590396 | BENDAMUSTINE |
| 634590390 | BENDAMUSTINE |
| 634590391 | BENDAMUSTINE |
| 502420060 | BEVACIZUMAB |
| 502420061 | BEVACIZUMAB |
| 001875525 | BEXAROTENE |
| 001875526 | BEXAROTENE |
| 003786955 | BEXAROTENE |
| 422920007 | BEXAROTENE |
| 628560602 | BEXAROTENE |
| 628560604 | BEXAROTENE |
| 686820003 | BEXAROTENE |
| 000930220 | BICALUTAMIDE |
| 003100705 | BICALUTAMIDE |
| 003787017 | BICALUTAMIDE |
| 007815409 | BICALUTAMIDE |
| 009046019 | BICALUTAMIDE |
| 167140571 | BICALUTAMIDE |
| 167290023 | BICALUTAMIDE |
| 416160485 | BICALUTAMIDE |
| 510790692 | BICALUTAMIDE |
| 519910560 | BICALUTAMIDE |
| 521250709 | BICALUTAMIDE |
| 548684503 | BICALUTAMIDE |
| 548686133 | BICALUTAMIDE |
| 604290226 | BICALUTAMIDE |
| 605052642 | BICALUTAMIDE |
| 636720005 | BICALUTAMIDE |
| 658410613 | BICALUTAMIDE |
| 672530191 | BICALUTAMIDE |
| 680840374 | BICALUTAMIDE |
| 680840612 | BICALUTAMIDE |
| 683820224 | BICALUTAMIDE |
| 621750132 | BICALUTAMIDE |
| 163640023 | BICALUTAMIDE |
| 163640091 | BICALUTAMIDE |
| 605053542 | BICALUTAMIDE |
| 422910168 | BICALUTAMIDE |
| 473350485 | BICALUTAMIDE |
| 604290177 | BICALUTAMIDE |
| 636295321 | BICALUTAMIDE |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 691890298 | BICALUTAMIDE |
| 007033154 | BLEOMYCIN |
| 007033155 | BLEOMYCIN |
| 553900005 | BLEOMYCIN |
| 553900006 | BLEOMYCIN |
| 617030323 | BLEOMYCIN |
| 617030332 | BLEOMYCIN |
| 633230136 | BLEOMYCIN |
| 633230137 | BLEOMYCIN |
| 701211567 | BLEOMYCIN |
| 555130160 | BLINATUMOMAB |
| 630200049 | BORTEZOMIB |
| 000690135 | BOSUTINIB |
| 000690193 | BOSUTINIB |
| 635390117 | BOSUTINIB |
| 000690136 | BOSUTINIB |
| 511440050 | BRENTUXIMAB VEDOTIN |
| 001730713 | BUSULFAN |
| 005170920 | BUSULFAN |
| 591480047 | BUSULFAN |
| 591480070 | BUSULFAN |
| 763880713 | BUSULFAN |
| 250210241 | BUSULFAN |
| 518170170 | BUSULFAN |
| 163640424 | BUSULFAN |
| 000245824 | CABAZITAXEL |
| 423880013 | CABOZANTINIB |
| 423880011 | CABOZANTINIB |
| 423880012 | CABOZANTINIB |
| 423880023 | CABOZANTINIB |
| 423880024 | CABOZANTINIB |
| 423880025 | CABOZANTINIB |
| 000041100 | CAPECITABINE |
| 000041101 | CAPECITABINE |
| 000540271 | CAPECITABINE |
| 000540272 | CAPECITABINE |
| 000937473 | CAPECITABINE |
| 000937474 | CAPECITABINE |
| 001790149 | CAPECITABINE |
| 001790195 | CAPECITABINE |
| 001790229 | CAPECITABINE |
| 003782511 | CAPECITABINE |
| 003782512 | CAPECITABINE |
| 167140467 | CAPECITABINE |
| 167140468 | CAPECITABINE |
| 167290072 | CAPECITABINE |
| 167290073 | CAPECITABINE |
| 422910167 | CAPECITABINE |
| 422910190 | CAPECITABINE |
| 422910191 | CAPECITABINE |
| 510790510 | CAPECITABINE |
| 538080411 | CAPECITABINE |
| 548684143 | CAPECITABINE |
| 548685260 | CAPECITABINE |
| 606870149 | CAPECITABINE |
| 637593000 | CAPECITABINE |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 637593001 | CAPECITABINE |
| 649800276 | CAPECITABINE |
| 649800277 | CAPECITABINE |
| 651620843 | CAPECITABINE |
| 651620844 | CAPECITABINE |
| 163640072 | CAPECITABINE |
| 163640073 | CAPECITABINE |
| 597650072 | CAPECITABINE |
| 597650073 | CAPECITABINE |
| 007033249 | CARBOPLATIN |
| 007034239 | CARBOPLATIN |
| 007034244 | CARBOPLATIN |
| 007034246 | CARBOPLATIN |
| 007034248 | CARBOPLATIN |
| 250210202 | CARBOPLATIN |
| 473350150 | CARBOPLATIN |
| 473350151 | CARBOPLATIN |
| 473350284 | CARBOPLATIN |
| 473350300 | CARBOPLATIN |
| 553900150 | CARBOPLATIN |
| 553900151 | CARBOPLATIN |
| 553900152 | CARBOPLATIN |
| 553900153 | CARBOPLATIN |
| 553900154 | CARBOPLATIN |
| 553900155 | CARBOPLATIN |
| 553900156 | CARBOPLATIN |
| 572770105 | CARBOPLATIN |
| 572770106 | CARBOPLATIN |
| 572770107 | CARBOPLATIN |
| 617030339 | CARBOPLATIN |
| 617030360 | CARBOPLATIN |
| 633230172 | CARBOPLATIN |
| 667580047 | CARBOPLATIN |
| 674570491 | CARBOPLATIN |
| 674570492 | CARBOPLATIN |
| 674570493 | CARBOPLATIN |
| 674570494 | CARBOPLATIN |
| 674570608 | CARBOPLATIN |
| 680830190 | CARBOPLATIN |
| 680830191 | CARBOPLATIN |
| 680830192 | CARBOPLATIN |
| 680830193 | CARBOPLATIN |
| 000153213 | CARBOPLATIN |
| 000153214 | CARBOPLATIN |
| 000153215 | CARBOPLATIN |
| 000153210 | CARBOPLATIN |
| 000153211 | CARBOPLATIN |
| 000153212 | CARBOPLATIN |
| 000153216 | CARBOPLATIN |
| 416160151 | CARBOPLATIN |
| 416160300 | CARBOPLATIN |
| 416160284 | CARBOPLATIN |
| 501110965 | CARBOPLATIN |
| 501110966 | CARBOPLATIN |
| 501110967 | CARBOPLATIN |
| 416160150 | CARBOPLATIN |


| NDC Code | Generic Drug Name |
| :--- | :--- |
| 473510001 | CARBOPLATIN |
| 540870339 | CARBOPLATIN |
| 167290295 | CARBOPLATIN |
| 597650295 | CARBOPLATIN |
| 507420445 | CARBOPLATIN |
| 50740446 | CARBOPLATIN |
| 507420447 | CARBOPLATIN |
| 507420448 | CARBOPLATIN |
| 400330202 | CARBOPLATIN |
| 712880100 | CARBOPLATIN |
| 760750101 | CARFILZOMIB |
| 760750102 | CARFILZOMIB |
| 000153012 | CARMUSTINE |
| 231550261 | CARMUSTINE |
| 243380050 | CARMUSTIIE |
| 62850177 | CARMUSTINE |
| 000780640 | CERITINIB |
| 667330948 | CETUXIMAB |
| 667330958 | CETUXIMAB |
| 708350004 | CETUXIMAB |
| 70850003 | CETUIMAB |
| 001730635 | CHLORAMBUCIL |
| 763880635 | CHLORAMBUCIL |
| 548681126 | CHLORAMBUCIL |
| 000153072 | CISPLATIN |
| 000630081 | CISPLATIN |
| 000690084 | CISPLATIN |
| 007035747 | CISPLATIN |
| 007035748 | CISPLATIN |
| 167290288 | CISPLATIN |
| 445670509 | CISPLATIN |
| 445670510 | CISPLATIN |
| 445670511 | CISPLATIN |
| 477810609 | CISPLATIN |
| 477810610 | CISPLATIN |
| 55390099 | CISPLATIN |
| 553900112 | CISPLATIN |
| 553900187 | CISPLATIN |
| 553900414 | CISPLATIN |
| 611260003 | CISPLATIN |
| 611260004 | CISPLATIN |
| 633230103 | CISPLATIN |
| 674570424 | CISPLATIN |
| 674570425 | CISPLATIN |
| 680010283 | CISPLATIN |
| 680830162 | CISPLATIN |
| 680830163 | CISPLATIN |
| 708600206 | CISPLATIN |
| 473510004 | CISPLATIN |
| 427910100 | CISPLATIN |
| 42790101 | CISPLATIN |
| 611260509 | CISPLATIN |
| 611260510 | CISPLATIN |
| 597650288 | CISPLATIN |
| 611260511 | CISPLATIN |
| 000690086 | CLADRIBINE |


| NDC Code | Generic Drug Name |
| :--- | :--- |
| 000690201 | CLADRIBIIE |
| 47350017 | CLADIBINE |
| 553900115 | CLADRIBINE |
| 553900124 | CLADRIBINE |
| 596760201 | CLADRIBINE |
| 633230140 | CLADRIBIIE |
| 67450450 | CLADIBINE |
| 674570451 | CLADRIBINE |
| 473510024 | CLADRIBINE |
| 000245860 | CLOFARABINE |
| 584680100 | CLOFARABINE |
| 63320572 | CLOFARABINE |
| 009551746 | CLOFARABINE |
| 000245917 | CLOFARABINE |
| 502420717 | COBIMETINIB |
| 504190385 | COPANLISIB |
| 000698140 | CRIZOTIIIB |
| 000698141 | CRIZOTINIB |
| 538692230 | CRIZOTINIB |
| 538692231 | CRIZOTINIB |
| 000540382 | CYCLOPHOSPHAMIDE |
| 00050383 | CYCLOPHOSPHAMIDE |
| 007813233 | CYCLOPHOSPHAMIDE |
| 007813244 | CYCLOPHOSPHAMIDE |
| 007813255 | CYCLOPHOSPHAMIDE |
| 100199935 | CYCLOPHOSPHAMIE |
| 100190936 | CYCLOPHOSPHAMIDE |
| 100190937 | CYCLOPHOSPHAMIDE |
| 100190938 | CYCLOPHOSPHAMIDE |
| 100190939 | CYCLOPHOSPHAMIDE |
| 100190942 | CYCLOPHOSPHAMIE |
| 100190943 | CYCLOPHOSPHAMIDE |
| 100190944 | CYCLOPHOSPHAMIDE |
| 100190945 | CYCLOPHOSPHAMIDE |
| 100190955 | CYCLOPHOSPHAMIDE |
| 100190956 | CYCLOPHOSPHAMIE |
| 100990957 | CYCLOPHOSPHAMIDE |
| 100190988 | CYCLOPHOSPHAMIDE |
| 100190989 | CYCLOPHOSPHAMIDE |
| 100190990 | CYCLOPHOSPHAMIDE |
| 548685005 | CYCLOPHOSPHAMIE |
| 548685218 | CYCLOPHOSPHAMIDE |
| 691890382 | CYCLOPHOSPHAMIDE |
| 691890383 | CYCLOPHOSPHAMIDE |
| 000150502 | CYCLOPHOSPHAMIDE |
| 000150505 | CYCLOPHOSPHAMDE |
| 000150506 | CYCLOPHOSPHAMIDE |
| 000150503 | CYCLOPHOSPHAMIDE |
| 000150504 | CYCLOPHOSPHAMIDE |
| 000544129 | CYCLOPHOSPHAMIDE |
| 00054130 | CYCLOPHOSPHAMDE |
| 578843071 | CYCLOPHOSPHAMIDE |
| 578843072 | CYCLOPHOSPHAMIDE |
| 578843073 | CYCLOPHOSPHAMIDE |
| 000690152 | CYTARABINE |
| 000690153 | CYTARABINE |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 000690154 | CYTARABINE |
| 000690155 | CYTARABINE |
| 553900131 | CYTARABINE |
| 553900132 | CYTARABINE |
| 553900133 | CYTARABINE |
| 553900134 | CYTARABINE |
| 553900806 | CYTARABINE |
| 553900807 | CYTARABINE |
| 553900808 | CYTARABINE |
| 553900809 | CYTARABINE |
| 617030303 | CYTARABINE |
| 617030304 | CYTARABINE |
| 617030305 | CYTARABINE |
| 617030319 | CYTARABINE |
| 633230120 | CYTARABINE |
| 674570452 | CYTARABINE |
| 674570454 | CYTARABINE |
| 674570455 | CYTARABINE |
| 674570615 | CYTARABINE |
| 473510027 | CYTARABINE |
| 473510026 | CYTARABINE |
| 473510025 | CYTARABINE |
| 473510029 | CYTARABINE |
| 540870305 | CYTARABINE |
| 540870319 | CYTARABINE |
| 510230319 | CYTARABINE |
| 510230305 | CYTARABINE |
| 510230303 | CYTARABINE |
| 510230304 | CYTARABINE |
| 576650331 | CYTARABINE, LIPOSOMAL |
| 000780681 | DABRAFENIB |
| 000780682 | DABRAFENIB |
| 001730846 | DABRAFENIB |
| 001730847 | DABRAFENIB |
| 007035075 | DACARBAZINE |
| 553900090 | DACARBAZINE |
| 553900339 | DACARBAZINE |
| 617030327 | DACARBAZINE |
| 633230127 | DACARBAZINE |
| 633230128 | DACARBAZINE |
| 540870327 | DACARBAZINE |
| 510230327 | DACARBAZINE |
| 552920811 | DACTINOMYCIN |
| 553900337 | DACTINOMYCIN |
| 673860811 | DACTINOMYCIN |
| 005170950 | DACTINOMYCIN |
| 686250811 | DACTINOMYCIN |
| 533990811 | DACTINOMYCIN |
| 578940502 | DARATUMUMAB |
| 621950210 | DARATUMUMAB |
| 621950200 | DARATUMUMAB |
| 000030524 | DASATINIB |
| 000030527 | DASATINIB |
| 000030528 | DASATINIB |
| 000030852 | DASATINIB |
| 000030855 | DASATINIB |


| NDC Code | Generic Drug Name |
| :--- | :--- |
| 000030857 | DASATINIB |
| 54865759 | DASATINIB |
| 605053628 | DASATINIB |
| 605053629 | DASATINIB |
| 605053630 | DASATINIB |
| 605053631 | DASATINIB |
| 001860527 | DASATINIB |
| 001860528 | DASATINIB |
| 001860524 | DASATINIB |
| 001860855 | DASATINIB |
| 00186852 | DASATINIB |
| 001860857 | DASATINIB |
| 426580007 | DAUNORUBICIN |
| 007035233 | DAUNORUBICIN |
| 553900108 | DAUNORUBICIN |
| 553900142 | DAUNORUBIIN |
| 55390281 | DAUNORUBICIN |
| 553900805 | DAUNORUBICIN |
| 108850001 | DAUNORUBICIN, LIPOSOMAL |
| 687270745 | DAUNORUBICIN and CYTARABINE |
| 007813139 | DECITABIIIE |
| 167290224 | DECITABINE |
| 427370110 | DECITABINE |
| 435980348 | DECITABINE |
| 435980427 | DECITABINE |
| 47335361 | DECITABIIE |
| 55110556 | DECITABINE |
| 591480046 | DECITABINE |
| 628560600 | DECITABINE |
| 690970285 | DECITABINE |
| 597650224 | DECITABIIE |
| 67450316 | DECITABINE |
| 555668301 | DEGARELIX |
| 555668303 | DEGARELIX |
| 555668401 | DEGARELIX |
| 55568403 | DEGARELX |
| 628560603 | DENILEUKIN DIFTITOX |
| 663020014 | DINUTUXIMAB |
| 000699141 | DOCETAXEL |
| 000699142 | DOCETAXEL |
| 000699144 | DOCETAXEL |
| 000758001 | DOCETAXEL |
| 000758003 | DOCETAXEL |
| 000758004 | DOCETAXEL |
| 000758005 | DOCETAXEL |
| 004090201 | DOCETAXEL |
| 004990366 | DOCETAXEL |
| 004090367 | DOCETAXEL |
| 004090368 | DOCETAXEL |
| 004090369 | DOCETAXEL |
| 007035720 | DOCETAXEL |
| 007035730 | DOCETAXEL |
| 009551020 | DOCETAXEL |
| 009551021 | DOCETAXEL |
| 009551022 | DOCETAXEL |
| 167140465 | DOCETAXEL |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 167140500 | DOCETAXEL |
| 167290120 | DOCETAXEL |
| 167290228 | DOCETAXEL |
| 167290231 | DOCETAXEL |
| 167290267 | DOCETAXEL |
| 250210222 | DOCETAXEL |
| 398222120 | DOCETAXEL |
| 398222180 | DOCETAXEL |
| 398222200 | DOCETAXEL |
| 423670121 | DOCETAXEL |
| 435980258 | DOCETAXEL |
| 435980259 | DOCETAXEL |
| 459630734 | DOCETAXEL |
| 459630765 | DOCETAXEL |
| 459630781 | DOCETAXEL |
| 459630790 | DOCETAXEL |
| 473350285 | DOCETAXEL |
| 473350286 | DOCETAXEL |
| 578843021 | DOCETAXEL |
| 637390932 | DOCETAXEL |
| 637390971 | DOCETAXEL |
| 667580050 | DOCETAXEL |
| 667580950 | DOCETAXEL |
| 510230366 | DOCETAXEL |
| 510230367 | DOCETAXEL |
| 510230368 | DOCETAXEL |
| 435980611 | DOCETAXEL |
| 435980610 | DOCETAXEL |
| 125168003 | DOCETAXEL |
| 181110013 | DOCETAXEL |
| 163640231 | DOCETAXEL |
| 163640267 | DOCETAXEL |
| 597650231 | DOCETAXEL |
| 597650267 | DOCETAXEL |
| 125168004 | DOCETAXEL |
| 128540803 | DOCETAXEL |
| 128540804 | DOCETAXEL |
| 128540805 | DOCETAXEL |
| 653925000 | DOCETAXEL |
| 578843041 | DOCETAXEL |
| 578843042 | DOCETAXEL |
| 578843043 | DOCETAXEL |
| 000690170 | DOXORUBICIN |
| 000690171 | DOXORUBICIN |
| 000693030 | DOXORUBICIN |
| 000693031 | DOXORUBICIN |
| 000693032 | DOXORUBICIN |
| 000693033 | DOXORUBICIN |
| 000693034 | DOXORUBICIN |
| 000694004 | DOXORUBICIN |
| 000694015 | DOXORUBICIN |
| 000694026 | DOXORUBICIN |
| 000694030 | DOXORUBICIN |
| 000694031 | DOXORUBICIN |
| 000694032 | DOXORUBICIN |
| 000694033 | DOXORUBICIN |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 000694034 | DOXORUBICIN |
| 000694037 | DOXORUBICIN |
| 001439547 | DOXORUBICIN |
| 001439548 | DOXORUBICIN |
| 001439549 | DOXORUBICIN |
| 004090124 | DOXORUBICIN |
| 007035040 | DOXORUBICIN |
| 007035043 | DOXORUBICIN |
| 007035046 | DOXORUBICIN |
| 167140742 | DOXORUBICIN |
| 167140856 | DOXORUBICIN |
| 435980283 | DOXORUBICIN |
| 435980541 | DOXORUBICIN |
| 250210207 | DOXORUBICIN |
| 459630733 | DOXORUBICIN |
| 627560826 | DOXORUBICIN |
| 627560827 | DOXORUBICIN |
| 633230101 | DOXORUBICIN |
| 633230883 | DOXORUBICIN |
| 674570393 | DOXORUBICIN |
| 674570394 | DOXORUBICIN |
| 674570395 | DOXORUBICIN |
| 674570396 | DOXORUBICIN |
| 674570436 | DOXORUBICIN |
| 674570478 | DOXORUBICIN |
| 680830248 | DOXORUBICIN |
| 680830249 | DOXORUBICIN |
| 680830250 | DOXORUBICIN |
| 001439546 | DOXORUBICIN |
| 531500314 | DOXORUBICIN |
| 531500315 | DOXORUBICIN |
| 531500317 | DOXORUBICIN |
| 531500320 | DOXORUBICIN |
| 553900231 | DOXORUBICIN |
| 553900232 | DOXORUBICIN |
| 553900233 | DOXORUBICIN |
| 553900235 | DOXORUBICIN |
| 553900236 | DOXORUBICIN |
| 553900237 | DOXORUBICIN |
| 553900238 | DOXORUBICIN |
| 553900241 | DOXORUBICIN |
| 553900242 | DOXORUBICIN |
| 553900243 | DOXORUBICIN |
| 553900245 | DOXORUBICIN |
| 553900246 | DOXORUBICIN |
| 553900247 | DOXORUBICIN |
| 553900248 | DOXORUBICIN |
| 596760966 | DOXORUBICIN |
| 701211218 | DOXORUBICIN |
| 701211219 | DOXORUBICIN |
| 473350049 | DOXORUBICIN, LIPOSOMAL |
| 473350050 | DOXORUBICIN, LIPOSOMAL |
| 473350082 | DOXORUBICIN, LIPOSOMAL |
| 473350083 | DOXORUBICIN, LIPOSOMAL |
| 596760960 | DOXORUBICIN, LIPOSOMAL |
| 000032291 | ELOTUZUMAB |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 000034522 | ELOTUZUMAB |
| 005902291 | ELOTUZUMAB |
| 005904522 | ELOTUZUMAB |
| 595720705 | ENASIDENIB |
| 595720710 | ENASIDENIB |
| 004690125 | ENZALUTAMIDE |
| 000095091 | EPIRUBICIN |
| 000095093 | EPIRUBICIN |
| 001151675 | EPIRUBICIN |
| 007033067 | EPIRUBICIN |
| 001439202 | EPIRUBICIN |
| 001439203 | EPIRUBICIN |
| 007033069 | EPIRUBICIN |
| 250210203 | EPIRUBICIN |
| 459630608 | EPIRUBICIN |
| 531040211 | EPIRUBICIN |
| 531500247 | EPIRUBICIN |
| 531500250 | EPIRUBICIN |
| 553900207 | EPIRUBICIN |
| 553900208 | EPIRUBICIN |
| 597625091 | EPIRUBICIN |
| 597625093 | EPIRUBICIN |
| 599230701 | EPIRUBICIN |
| 617030347 | EPIRUBICIN |
| 617030348 | EPIRUBICIN |
| 617030359 | EPIRUBICIN |
| 667580042 | EPIRUBICIN |
| 674570357 | EPIRUBICIN |
| 674570358 | EPIRUBICIN |
| 000097224 | EQUINE THYMOCYTE IMMUNE GLOBULIN |
| 628560389 | ERIBULIN |
| 502420062 | ERLOTINIB |
| 502420063 | ERLOTINIB |
| 502420064 | ERLOTINIB |
| 548685290 | ERLOTINIB |
| 548685447 | ERLOTINIB |
| 548685474 | ERLOTINIB |
| 691890063 | ERLOTINIB |
| 000130132 | ESTRAMUSTINE |
| 000153404 | ETOPOSIDE |
| 001439510 | ETOPOSIDE |
| 001439511 | ETOPOSIDE |
| 001439512 | ETOPOSIDE |
| 003783266 | ETOPOSIDE |
| 007035653 | ETOPOSIDE |
| 007035656 | ETOPOSIDE |
| 007035657 | ETOPOSIDE |
| 167290114 | ETOPOSIDE |
| 167290262 | ETOPOSIDE |
| 426050031 | ETOPOSIDE |
| 426050032 | ETOPOSIDE |
| 426050033 | ETOPOSIDE |
| 553900291 | ETOPOSIDE |
| 553900292 | ETOPOSIDE |
| 553900293 | ETOPOSIDE |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 553900491 | ETOPOSIDE |
| 553900492 | ETOPOSIDE |
| 553900493 | ETOPOSIDE |
| 633230104 | ETOPOSIDE |
| 680010265 | ETOPOSIDE |
| 000153084 | ETOPOSIDE |
| 000153061 | ETOPOSIDE |
| 000153062 | ETOPOSIDE |
| 000153091 | ETOPOSIDE |
| 000153095 | ETOPOSIDE |
| 163640114 | ETOPOSIDE |
| 000780566 | EVEROLIMUS |
| 000780567 | EVEROLIMUS |
| 000780594 | EVEROLIMUS |
| 000780620 | EVEROLIMUS |
| 000780626 | EVEROLIMUS |
| 000780627 | EVEROLIMUS |
| 000780628 | EVEROLIMUS |
| 000097663 | EXEMESTANE |
| 000540080 | EXEMESTANE |
| 003785001 | EXEMESTANE |
| 477810108 | EXEMESTANE |
| 548685261 | EXEMESTANE |
| 597622858 | EXEMESTANE |
| 606870132 | EXEMESTANE |
| 108297663 | EXEMESTANE |
| 108292858 | EXEMESTANE |
| 008320595 | EXEMESTANE |
| 553900135 | FLOXURIDINE |
| 633230145 | FLOXURIDINE |
| 617030331 | FLOXURIDINE |
| 000245820 | FLUDARABINE |
| 000699321 | FLUDARABINE |
| 007034852 | FLUDARABINE |
| 007035854 | FLUDARABINE |
| 250210205 | FLUDARABINE |
| 250210237 | FLUDARABINE |
| 250210242 | FLUDARABINE |
| 459630609 | FLUDARABINE |
| 459630621 | FLUDARABINE |
| 617030344 | FLUDARABINE |
| 633230192 | FLUDARABINE |
| 633230196 | FLUDARABINE |
| 667580046 | FLUDARABINE |
| 674570238 | FLUDARABINE |
| 674570268 | FLUDARABINE |
| 674570495 | FLUDARABINE |
| 000690169 | FLUOROURACIL |
| 000690173 | FLUOROURACIL |
| 000690174 | FLUOROURACIL |
| 000690176 | FLUOROURACIL |
| 007033015 | FLUOROURACIL |
| 007033018 | FLUOROURACIL |
| 007033019 | FLUOROURACIL |
| 101390063 | FLUOROURACIL |
| 167290276 | FLUOROURACIL |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 250210215 | FLUOROURACIL |
| 435470258 | FLUOROURACIL |
| 435470259 | FLUOROURACIL |
| 633230117 | FLUOROURACIL |
| 667580044 | FLUOROURACIL |
| 667580054 | FLUOROURACIL |
| 680010266 | FLUOROURACIL |
| 473510033 | FLUOROURACIL |
| 163640276 | FLUOROURACIL |
| 597650276 | FLUOROURACIL |
| 400330215 | FLUOROURACIL |
| 681520106 | FLUOROURACIL |
| 680830269 | FLUOROURACIL |
| 680830270 | FLUOROURACIL |
| 001724960 | FLUTAMIDE |
| 005912466 | FLUTAMIDE |
| 498840753 | FLUTAMIDE |
| 604290272 | FLUTAMIDE |
| 690970915 | FLUTAMIDE |
| 001851125 | FLUTAMIDE |
| 000850525 | FLUTAMIDE |
| 555670150 | FLUTAMIDE |
| 005550870 | FLUTAMIDE |
| 548684628 | FLUTAMIDE |
| 003100720 | FULVESTRANT |
| 621950072 | FULVESTRANT |
| 003100482 | GEFITINIB |
| 000027501 | GEMCITABINE |
| 007035775 | GEMCITABINE |
| 007035778 | GEMCITABINE |
| 007813282 | GEMCITABINE |
| 007813283 | GEMCITABINE |
| 167290092 | GEMCITABINE |
| 167290117 | GEMCITABINE |
| 167290118 | GEMCITABINE |
| 231550213 | GEMCITABINE |
| 231550214 | GEMCITABINE |
| 231550483 | GEMCITABINE |
| 231550484 | GEMCITABINE |
| 231550528 | GEMCITABINE |
| 231550529 | GEMCITABINE |
| 250210208 | GEMCITABINE |
| 250210209 | GEMCITABINE |
| 250210234 | GEMCITABINE |
| 250210235 | GEMCITABINE |
| 422360001 | GEMCITABINE |
| 422360002 | GEMCITABINE |
| 459630612 | GEMCITABINE |
| 459630619 | GEMCITABINE |
| 459630623 | GEMCITABINE |
| 459630624 | GEMCITABINE |
| 459630636 | GEMCITABINE |
| 473350153 | GEMCITABINE |
| 473350154 | GEMCITABINE |
| 551110686 | GEMCITABINE |
| 551110687 | GEMCITABINE |


| NDC Code | Generic Drug Name |
| :--- | :--- |
| 553900391 | GEMCITABINE |
| 578844001 | GEMCITABINE |
| 633230102 | GEMCITABINE |
| 633230125 | GEMCITABINE |
| 633230126 | GEMCITABINE |
| 67450462 | GEMCIABINE |
| 674570463 | GEMCITABINE |
| 674570464 | GEMCITABINE |
| 680830148 | GEMCITABINE |
| 680830149 | GEMCITABINE |
| 00007502 | GEMCIABINE |
| 000693857 | GEMCITABINE |
| 000693858 | GEMCITABINE |
| 000693859 | GEMCITABINE |
| 004090181 | GEMCITABINE |
| 004000182 | GEMCIABINE |
| 004090183 | GEMCITABINE |
| 004090185 | GEMCITABINE |
| 004090186 | GEMCITABINE |
| 004090187 | GEMCITABINE |
| 005913562 | GEMCIABINE |
| 005913563 | GEMCITABINE |
| 459630620 | GEMCITABINE |
| 578844002 | GEMCITABINE |
| 680010282 | GEMCIABINE |
| 69090313 | GEMCITABINE |
| 690970314 | GEMCITABINE |
| 708600205 | GEMCITABINE |
| 708600204 | GEMCITABINE |
| 000084510 | GEMTUZUMAB OZOGAMICIN |
| 003100950 | GOSERELIN |
| 003100951 | GOSERELIN |
| 679790500 | HISTRELIN |
| 681520103 | IBRITUMOMAB TIUXETAN |
| 579620140 | IBRUTINIB |
| 000132576 | IDARUBICIN |
| 000132586 | IDARUBICIN |
| 000132596 | IDARUBICIN |
| 001439217 | IDARUBICIN |
| 001439218 | IDARUBICIN |
| 001499219 | IDARUBIIIN |
| 007034154 | IDARUBICIN |
| 007034155 | IDARUBICIN |
| 007034156 | IDARUBICIN |
| 53150336 | IDARUBICCI |
| 531500386 | IDARUBICIN |
| 531500411 | IDARUBICIN |
| 633230194 | IDARUBICIN |
| 667580055 | IDARUBICIN |
| 619581701 | IDELALISIB |
| 619581702 | IDELALISIB |
| 000694495 | IFOSFAMIDE |
| 000694496 | IFOSFAMIDE |
| 003383991 | IFOSFAMIDE |
| 003383993 | IFOSFAMIDE |
| 007033427 | IFOSFAMIDE |


| NDC Code | Generic Drug Name |
| :--- | :--- |
| 007033429 | IFOSFAMIDE |
| 007034100 | IFOSFAMIDE |
| 007034106 | IFOSFAMIDE |
| 007034116 | IFOSFAMIDE |
| 100190925 | IFOSFAMIDE |
| 100190926 | IFOSFAMIDE |
| 553900047 | IFOSFAMIDE |
| 553900048 | IFOSFAMIDE |
| 633230142 | IFOSFAMIDE |
| 633230174 | IFOSFAMIDE |
| 67450429 | IFOSFAMIDE |
| 674570443 | IFOSFAMIDE |
| 674570609 | IFOSFAMIDE |
| 000150556 | IFOSFAMIDE |
| 000150557 | IFOSFAMIDE |
| 47350032 | IFOSFAMIDE |
| 426050026 | IFOSFAMIDE |
| 426050025 | IFOSFAMIDE |
| 001439531 | IFOSFAMIDE |
| 001439530 | IFOSFAMIDE |
| 003782245 | IMATINIB |
| 003782246 | IMATINIB |
| 000780401 | IMATINIB |
| 000780438 | IMATINIB |
| 000780649 | IMATINB |
| 000937629 | IMATIIIB |
| 000937630 | IMATINIB |
| 422910351 | IMATINIB |
| 422910352 | IMATINIB |
| 473350472 | IMATINB |
| 47350475 | IMATINIB |
| 502680426 | IMATINIB |
| 502680427 | IMATINIB |
| 548685289 | IMATINIB |
| 548685427 | IMATINB |
| 604290925 | IMATINIB |
| 604290926 | IMATINIB |
| 605052900 | IMATINIB |
| 605052901 | IMATINIB |
| 606870192 | IMATINB |
| 60680203 | IMATINIB |
| 668280030 | IMATINIB |
| 691890403 | IMATINIB |
| 000080100 | INOTUZUMAB OZOGAMICIN |
| 170890378 | INTERFERON, GAMMA 1-B |
| 422380111 | INTERFERON, GAMMA 1-B |
| 759870111 | INTERFERON, GAMMA 1-B |
| 641160011 | INTERFERON, GAMMA 1-B |
| 000032327 | IPILIMUMAB |
| 000032328 | IPIIMUMAB |
| 00592327 | IPLIMUMAB |
| 005902328 | IPILIMUMAB |
| 669142327 | IPILIMUMAB |
| 669142328 | IPILIMUMAB |
| 000091111 | IRINOTECAN |
| 000097529 | IRINOTECAN |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 001439701 | IRINOTECAN |
| 001439702 | IRINOTECAN |
| 167140725 | IRINOTECAN |
| 167140726 | IRINOTECAN |
| 231550179 | IRINOTECAN |
| 250210214 | IRINOTECAN |
| 473350937 | IRINOTECAN |
| 473350953 | IRINOTECAN |
| 531040151 | IRINOTECAN |
| 578843001 | IRINOTECAN |
| 578843002 | IRINOTECAN |
| 001439583 | IRINOTECAN |
| 007034432 | IRINOTECAN |
| 007034434 | IRINOTECAN |
| 150540043 | IRINOTECAN |
| 250210230 | IRINOTECAN |
| 459630614 | IRINOTECAN |
| 507420401 | IRINOTECAN |
| 507420402 | IRINOTECAN |
| 599230702 | IRINOTECAN |
| 617030349 | IRINOTECAN |
| 633230193 | IRINOTECAN |
| 667580048 | IRINOTECAN |
| 680010284 | IRINOTECAN |
| 691710398 | IRINOTECAN, LIPOSOMAL |
| 000151910 | IXABEPILONE |
| 000151911 | IXABEPILONE |
| 700201910 | IXABEPILONE |
| 700201911 | IXABEPILONE |
| 630200078 | IXAZOMIB |
| 630200079 | IXAZOMIB |
| 630200080 | IXAZOMIB |
| 150540060 | LANREOTIDE |
| 150540090 | LANREOTIDE |
| 150540120 | LANREOTIDE |
| 150541060 | LANREOTIDE |
| 150541090 | LANREOTIDE |
| 150541120 | LANREOTIDE |
| 000780671 | LAPATINIB |
| 001730752 | LAPATINIB |
| 595720402 | LENALIDOMIDE |
| 595720405 | LENALIDOMIDE |
| 595720410 | LENALIDOMIDE |
| 595720415 | LENALIDOMIDE |
| 595720420 | LENALIDOMIDE |
| 595720425 | LENALIDOMIDE |
| 628560708 | LENVATINIB |
| 628560710 | LENVATINIB |
| 628560714 | LENVATINIB |
| 628560718 | LENVATINIB |
| 628560720 | LENVATINIB |
| 628560724 | LENVATINIB |
| 000540269 | LETROZOLE |
| 000780249 | LETROZOLE |
| 000937620 | LETROZOLE |
| 003782071 | LETROZOLE |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 006034180 | LETROZOLE |
| 167290034 | LETROZOLE |
| 245350801 | LETROZOLE |
| 247240030 | LETROZOLE |
| 422540243 | LETROZOLE |
| 519910759 | LETROZOLE |
| 548684151 | LETROZOLE |
| 548686252 | LETROZOLE |
| 551110646 | LETROZOLE |
| 578842021 | LETROZOLE |
| 605053255 | LETROZOLE |
| 621750888 | LETROZOLE |
| 627560511 | LETROZOLE |
| 633230772 | LETROZOLE |
| 658410744 | LETROZOLE |
| 683820363 | LETROZOLE |
| 422910373 | LETROZOLE |
| 638500025 | LETROZOLE |
| 163640034 | LETROZOLE |
| 004807620 | LETROZOLE |
| 621470237 | LETROZOLE |
| 691897620 | LETROZOLE |
| 001790169 | LETROZOLE |
| 005271712 | LETROZOLE |
| 422910374 | LETROZOLE |
| 680840803 | LETROZOLE |
| 000780909 | LETROZOLE and RIBOCICLIB |
| 000780916 | LETROZOLE and RIBOCICLIB |
| 000780923 | LETROZOLE and RIBOCICLIB |
| 000240222 | LEUPROLIDE |
| 000240605 | LEUPROLIDE |
| 000240610 | LEUPROLIDE |
| 000240793 | LEUPROLIDE |
| 000742108 | LEUPROLIDE |
| 000742282 | LEUPROLIDE |
| 000742440 | LEUPROLIDE |
| 000743346 | LEUPROLIDE |
| 000743473 | LEUPROLIDE |
| 000743641 | LEUPROLIDE |
| 000743642 | LEUPROLIDE |
| 000743663 | LEUPROLIDE |
| 000743683 | LEUPROLIDE |
| 000743779 | LEUPROLIDE |
| 000749694 | LEUPROLIDE |
| 001857400 | LEUPROLIDE |
| 007034014 | LEUPROLIDE |
| 007814003 | LEUPROLIDE |
| 473350936 | LEUPROLIDE |
| 416160936 | LEUPROLIDE |
| 521250736 | LEUPROLIDE |
| 629350222 | LEUPROLIDE |
| 629350223 | LEUPROLIDE |
| 629350302 | LEUPROLIDE |
| 629350303 | LEUPROLIDE |
| 629350452 | LEUPROLIDE |
| 629350453 | LEUPROLIDE |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 629350752 | LEUPROLIDE |
| 629350753 | LEUPROLIDE |
| 000153030 | LOMUSTINE |
| 000153031 | LOMUSTINE |
| 581813030 | LOMUSTINE |
| 581813031 | LOMUSTINE |
| 581813032 | LOMUSTINE |
| 581813040 | LOMUSTINE |
| 581813041 | LOMUSTINE |
| 581813042 | LOMUSTINE |
| 581813043 | LOMUSTINE |
| 000153032 | LOMUSTINE |
| 424270002 | MECHLORETHAMINE |
| 552920911 | MECHLORETHAMINE |
| 662150016 | MECHLORETHAMINE |
| 101390321 | MELPHALAN |
| 250210221 | MELPHALAN |
| 420230149 | MELPHALAN |
| 459630686 | MELPHALAN |
| 477810200 | MELPHALAN |
| 526090001 | MELPHALAN |
| 526093001 | MELPHALAN |
| 674570195 | MELPHALAN |
| 674570215 | MELPHALAN |
| 674570579 | MELPHALAN |
| 681520109 | MELPHALAN |
| 595720302 | MELPHALAN |
| 001730045 | MELPHALAN |
| 548684339 | MELPHALAN |
| 167290108 | MITOMYCIN |
| 167290115 | MITOMYCIN |
| 167290116 | MITOMYCIN |
| 167290246 | MITOMYCIN |
| 167290247 | MITOMYCIN |
| 167290248 | MITOMYCIN |
| 497710002 | MITOMYCIN |
| 553900251 | MITOMYCIN |
| 553900252 | MITOMYCIN |
| 553900253 | MITOMYCIN |
| 553900451 | MITOMYCIN |
| 553900452 | MITOMYCIN |
| 553900453 | MITOMYCIN |
| 694480001 | MITOMYCIN |
| 694480002 | MITOMYCIN |
| 694480003 | MITOMYCIN |
| 000153001 | MITOMYCIN |
| 000153002 | MITOMYCIN |
| 000153059 | MITOMYCIN |
| 163640116 | MITOMYCIN |
| 163640108 | MITOMYCIN |
| 163640115 | MITOMYCIN |
| 597650116 | MITOMYCIN |
| 597650108 | MITOMYCIN |
| 597650115 | MITOMYCIN |
| 000153080 | MITOTANE |
| 611260103 | MITOTANE |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 000690080 | MITOXANTRONE |
| 007034680 | MITOXANTRONE |
| 007034686 | MITOXANTRONE |
| 553900085 | MITOXANTRONE |
| 617030343 | MITOXANTRONE |
| 633230132 | MITOXANTRONE |
| 007034685 | MITOXANTRONE |
| 553900083 | MITOXANTRONE |
| 553900084 | MITOXANTRONE |
| 000027716 | NECITUMUMAB |
| 000074401 | NELARABINE |
| 000780683 | NELARABINE |
| 633790011 | NELARABINE |
| 704370240 | NERATINIB |
| 000780526 | NILOTINIB |
| 000780592 | NILOTINIB |
| 000881111 | NILUTAMIDE |
| 249870111 | NILUTAMIDE |
| 592120111 | NILUTAMIDE |
| 625590173 | NILUTAMIDE |
| 696560103 | NIRAPARIB |
| 000033772 | NIVOLUMAB |
| 000033774 | NIVOLUMAB |
| 005903772 | NIVOLUMAB |
| 005903774 | NIVOLUMAB |
| 621950611 | NIVOLUMAB |
| 621950610 | NIVOLUMAB |
| 502420070 | OBINUTUZUMAB |
| 000780646 | OCTREOTIDE |
| 000780647 | OCTREOTIDE |
| 000780648 | OCTREOTIDE |
| 000780811 | OCTREOTIDE |
| 000780818 | OCTREOTIDE |
| 000780825 | OCTREOTIDE |
| 000780669 | OFATUMUMAB |
| 000780690 | OFATUMUMAB |
| 001730821 | OFATUMUMAB |
| 001730808 | OFATUMUMAB |
| 633790023 | OFATUMUMAB |
| 003100657 | OLAPARIB |
| 003100668 | OLAPARIB |
| 003100679 | OLAPARIB |
| 634590177 | OMACETAXINE |
| 003101349 | OSIMERTINIB |
| 003101350 | OSIMERTINIB |
| 000240590 | OXALIPLATIN |
| 000240591 | OXALIPLATIN |
| 000690067 | OXALIPLATIN |
| 000690070 | OXALIPLATIN |
| 000690074 | OXALIPLATIN |
| 000691010 | OXALIPLATIN |
| 007033985 | OXALIPLATIN |
| 007033986 | OXALIPLATIN |
| 007813315 | OXALIPLATIN |
| 007813317 | OXALIPLATIN |
| 007819315 | OXALIPLATIN |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 007819317 | OXALIPLATIN |
| 009551725 | OXALIPLATIN |
| 009551727 | OXALIPLATIN |
| 009551731 | OXALIPLATIN |
| 009551733 | OXALIPLATIN |
| 125160592 | OXALIPLATIN |
| 250210211 | OXALIPLATIN |
| 250210212 | OXALIPLATIN |
| 250210233 | OXALIPLATIN |
| 459630611 | OXALIPLATIN |
| 473350046 | OXALIPLATIN |
| 473350047 | OXALIPLATIN |
| 473350176 | OXALIPLATIN |
| 473350178 | OXALIPLATIN |
| 572770001 | OXALIPLATIN |
| 572770002 | OXALIPLATIN |
| 605056132 | OXALIPLATIN |
| 617030361 | OXALIPLATIN |
| 617030362 | OXALIPLATIN |
| 617030363 | OXALIPLATIN |
| 633230211 | OXALIPLATIN |
| 633230212 | OXALIPLATIN |
| 633230650 | OXALIPLATIN |
| 633230750 | OXALIPLATIN |
| 671840508 | OXALIPLATIN |
| 671840509 | OXALIPLATIN |
| 671840510 | OXALIPLATIN |
| 674570442 | OXALIPLATIN |
| 674570468 | OXALIPLATIN |
| 674570469 | OXALIPLATIN |
| 674570476 | OXALIPLATIN |
| 680830176 | OXALIPLATIN |
| 680830177 | OXALIPLATIN |
| 680830314 | OXALIPLATIN |
| 633230175 | OXALIPLATIN |
| 633230176 | OXALIPLATIN |
| 667580053 | OXALIPLATIN |
| 000240597 | OXALIPLATIN |
| 000240596 | OXALIPLATIN |
| 473510006 | OXALIPLATIN |
| 181110005 | OXALIPLATIN |
| 181110011 | OXALIPLATIN |
| 473510057 | OXALIPLATIN |
| 473510007 | OXALIPLATIN |
| 578843051 | OXALIPLATIN |
| 578843052 | OXALIPLATIN |
| 128540549 | OXALIPLATIN |
| 128540551 | OXALIPLATIN |
| 671840502 | OXALIPLATIN |
| 671840501 | OXALIPLATIN |
| 680830271 | OXALIPLATIN |
| 680830272 | OXALIPLATIN |
| 540870363 | OXALIPLATIN |
| 416160176 | OXALIPLATIN |
| 416160178 | OXALIPLATIN |
| 167290332 | OXALIPLATIN |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 597650332 | OXALIPLATIN |
| 708600201 | OXALIPLATIN |
| 519910922 | OXALIPLATIN |
| 519910923 | OXALIPLATIN |
| 680830170 | OXALIPLATIN |
| 680830171 | OXALIPLATIN |
| 005171910 | OXALIPLATIN |
| 005171920 | OXALIPLATIN |
| 690970274 | OXALIPLATIN |
| 690970353 | OXALIPLATIN |
| 712880101 | OXALIPLATIN |
| 690970572 | OXALIPLATIN |
| 690970594 | OXALIPLATIN |
| 519910218 | OXALIPLATIN |
| 519910219 | OXALIPLATIN |
| 167140727 | OXALIPLATIN |
| 167140728 | OXALIPLATIN |
| 477810591 | OXALIPLATIN |
| 477810592 | OXALIPLATIN |
| 000690076 | PACLITAXEL |
| 000690078 | PACLITAXEL |
| 000690079 | PACLITAXEL |
| 007034764 | PACLITAXEL |
| 007034766 | PACLITAXEL |
| 007034767 | PACLITAXEL |
| 007034768 | PACLITAXEL |
| 250210213 | PACLITAXEL |
| 445670504 | PACLITAXEL |
| 445670505 | PACLITAXEL |
| 445670506 | PACLITAXEL |
| 459630613 | PACLITAXEL |
| 473510009 | PACLITAXEL |
| 553900114 | PACLITAXEL |
| 553900304 | PACLITAXEL |
| 553900314 | PACLITAXEL |
| 617030342 | PACLITAXEL |
| 633230763 | PACLITAXEL |
| 667580043 | PACLITAXEL |
| 674570434 | PACLITAXEL |
| 674570449 | PACLITAXEL |
| 674570471 | PACLITAXEL |
| 680830178 | PACLITAXEL |
| 680830179 | PACLITAXEL |
| 680830180 | PACLITAXEL |
| 708600200 | PACLITAXEL |
| 000153475 | PACLITAXEL |
| 000153476 | PACLITAXEL |
| 000153479 | PACLITAXEL |
| 001723754 | PACLITAXEL |
| 181110007 | PACLITAXEL |
| 528180001 | PACLITAXEL |
| 611260514 | PACLITAXEL |
| 611260515 | PACLITAXEL |
| 611260516 | PACLITAXEL |
| 528180002 | PACLITAXEL |
| 000444953 | PACLITAXEL |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 540870342 | PACLITAXEL |
| 519910936 | PACLITAXEL |
| 519910937 | PACLITAXEL |
| 519910938 | PACLITAXEL |
| 688170134 | PACLITAXEL, PROTEIN-BOUND |
| 000690187 | PALBOCICLIB |
| 000690188 | PALBOCICLIB |
| 000690189 | PALBOCICLIB |
| 635390189 | PALBOCICLIB |
| 538690187 | PALBOCICLIB |
| 538690188 | PALBOCICLIB |
| 538690189 | PALBOCICLIB |
| 555130954 | PANITUMUMAB |
| 555130955 | PANITUMUMAB |
| 555130956 | PANITUMUMAB |
| 000780650 | PANOBINOSTAT |
| 000780651 | PANOBINOSTAT |
| 000780652 | PANOBINOSTAT |
| 000780670 | PAZOPANIB |
| 001730804 | PAZOPANIB |
| 009443810 | PEGASPARGASE |
| 544820301 | PEGASPARGASE |
| 000063026 | PEMBROLIZUMAB |
| 000063029 | PEMBROLIZUMAB |
| 000027623 | PEMETREXED |
| 000027640 | PEMETREXED |
| 004090801 | PENTOSTATIN |
| 553900244 | PENTOSTATIN |
| 502420145 | PERTUZUMAB |
| 595720501 | POMALIDOMIDE |
| 595720502 | POMALIDOMIDE |
| 595720503 | POMALIDOMIDE |
| 595720504 | POMALIDOMIDE |
| 761890533 | PONATINIB |
| 761890534 | PONATINIB |
| 761890535 | PONATINIB |
| 488180001 | PRALATREXATE |
| 544820053 | PROCARBAZINE |
| 000027669 | RAMUCIRUMAB |
| 000027678 | RAMUCIRUMAB |
| 504190171 | REGORAFENIB |
| 000780860 | RIBOCICLIB |
| 000780867 | RIBOCICLIB |
| 000780874 | RIBOCICLIB |
| 502420051 | RITUXIMAB |
| 502420053 | RITUXIMAB |
| 502420108 | RITUXIMAB and HYALURONIDASE |
| 502420109 | RITUXIMAB and HYALURONIDASE |
| 460260983 | ROMIDEPSIN |
| 595720983 | ROMIDEPSIN |
| 595720984 | ROMIDEPSIN |
| 696600201 | RUCAPARIB |
| 696600202 | RUCAPARIB |
| 696600203 | RUCAPARIB |
| 508810005 | RUXOLITINIB |
| 508810010 | RUXOLITINIB |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 508810015 | RUXOLITINIB |
| 508810020 | RUXOLITINIB |
| 508810025 | RUXOLITINIB |
| 578940420 | SILTUXIMAB |
| 578940421 | SILTUXIMAB |
| 302378900 | SIPULEUCEL-T |
| 000780645 | SONIDEGIB |
| 504190488 | SORAFENIB |
| 007034636 | STREPTOZOCIN |
| 000690550 | SUNITINIB |
| 000690770 | SUNITINIB |
| 000690830 | SUNITINIB |
| 000690980 | SUNITINIB |
| 555130078 | TALIMOGENE LAHERPAREPVEC |
| 555130079 | TALIMOGENE LAHERPAREPVEC |
| 000930784 | TAMOXIFEN |
| 001790224 | TAMOXIFEN |
| 001791952 | TAMOXIFEN |
| 003780144 | TAMOXIFEN |
| 003780274 | TAMOXIFEN |
| 005912233 | TAMOXIFEN |
| 005912472 | TAMOXIFEN |
| 005912473 | TAMOXIFEN |
| 136320123 | TAMOXIFEN |
| 548683004 | TAMOXIFEN |
| 548684287 | TAMOXIFEN |
| 636294413 | TAMOXIFEN |
| 637390269 | TAMOXIFEN |
| 680840924 | TAMOXIFEN |
| 680840935 | TAMOXIFEN |
| 000930782 | TAMOXIFEN |
| 518620446 | TAMOXIFEN |
| 518620447 | TAMOXIFEN |
| 518620449 | TAMOXIFEN |
| 518620450 | TAMOXIFEN |
| 604290909 | TAMOXIFEN |
| 604290910 | TAMOXIFEN |
| 000540320 | TEMOZOLOMIDE |
| 000540321 | TEMOZOLOMIDE |
| 000540322 | TEMOZOLOMIDE |
| 000540323 | TEMOZOLOMIDE |
| 000540324 | TEMOZOLOMIDE |
| 000540325 | TEMOZOLOMIDE |
| 000851366 | TEMOZOLOMIDE |
| 000851381 | TEMOZOLOMIDE |
| 000851417 | TEMOZOLOMIDE |
| 000851425 | TEMOZOLOMIDE |
| 000851430 | TEMOZOLOMIDE |
| 000851519 | TEMOZOLOMIDE |
| 000853004 | TEMOZOLOMIDE |
| 000937599 | TEMOZOLOMIDE |
| 000937600 | TEMOZOLOMIDE |
| 000937601 | TEMOZOLOMIDE |
| 000937602 | TEMOZOLOMIDE |
| 000937638 | TEMOZOLOMIDE |
| 000937639 | TEMOZOLOMIDE |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 003785260 | TEMOZOLOMIDE |
| 003785261 | TEMOZOLOMIDE |
| 003785262 | TEMOZOLOMIDE |
| 003785263 | TEMOZOLOMIDE |
| 003785264 | TEMOZOLOMIDE |
| 003785265 | TEMOZOLOMIDE |
| 005271777 | TEMOZOLOMIDE |
| 005271778 | TEMOZOLOMIDE |
| 005271779 | TEMOZOLOMIDE |
| 005271780 | TEMOZOLOMIDE |
| 005271781 | TEMOZOLOMIDE |
| 005271782 | TEMOZOLOMIDE |
| 007812691 | TEMOZOLOMIDE |
| 007812692 | TEMOZOLOMIDE |
| 007812693 | TEMOZOLOMIDE |
| 007812694 | TEMOZOLOMIDE |
| 007812695 | TEMOZOLOMIDE |
| 007812696 | TEMOZOLOMIDE |
| 167290048 | TEMOZOLOMIDE |
| 167290049 | TEMOZOLOMIDE |
| 167290050 | TEMOZOLOMIDE |
| 167290051 | TEMOZOLOMIDE |
| 167290129 | TEMOZOLOMIDE |
| 167290130 | TEMOZOLOMIDE |
| 400510604 | TEMOZOLOMIDE |
| 400510605 | TEMOZOLOMIDE |
| 400510606 | TEMOZOLOMIDE |
| 400510607 | TEMOZOLOMIDE |
| 400510608 | TEMOZOLOMIDE |
| 400510609 | TEMOZOLOMIDE |
| 439750252 | TEMOZOLOMIDE |
| 439750253 | TEMOZOLOMIDE |
| 439750254 | TEMOZOLOMIDE |
| 439750255 | TEMOZOLOMIDE |
| 439750256 | TEMOZOLOMIDE |
| 439750257 | TEMOZOLOMIDE |
| 473350890 | TEMOZOLOMIDE |
| 473350891 | TEMOZOLOMIDE |
| 473350892 | TEMOZOLOMIDE |
| 473350893 | TEMOZOLOMIDE |
| 473350929 | TEMOZOLOMIDE |
| 473350930 | TEMOZOLOMIDE |
| 502680761 | TEMOZOLOMIDE |
| 502680762 | TEMOZOLOMIDE |
| 502680763 | TEMOZOLOMIDE |
| 518620083 | TEMOZOLOMIDE |
| 518620084 | TEMOZOLOMIDE |
| 518620085 | TEMOZOLOMIDE |
| 518620086 | TEMOZOLOMIDE |
| 518620087 | TEMOZOLOMIDE |
| 518620088 | TEMOZOLOMIDE |
| 548684142 | TEMOZOLOMIDE |
| 548685348 | TEMOZOLOMIDE |
| 548685350 | TEMOZOLOMIDE |
| 548685354 | TEMOZOLOMIDE |
| 548685980 | TEMOZOLOMIDE |


| NDC Code | Generic Drug Name |
| :--- | :--- |
| 621750240 | TEMOZOLOMIE |
| 621750241 | TEMOZOLOMIDE |
| 621750242 | TEMOZOLOMIDE |
| 621750243 | TEMOZOLOMIDE |
| 621750244 | TEMOZOLOMIDE |
| 621750245 | TEMOZOLOMIE |
| 64140501 | TEMOZOLOMIDE |
| 641440502 | TEMOZOLOMIDE |
| 641440503 | TEMOZOLOMIDE |
| 641440504 | TEMOZOLOMIDE |
| 64140505 | TEMOZOLOMIE |
| 641440506 | TEMOZOLOMIDE |
| 649800333 | TEMOZOLOMIDE |
| 649800334 | TEMOZOLOMIDE |
| 649800335 | TEMOZOLOMIDE |
| 649800336 | TEMOZOLOMIE |
| 649800337 | TEMOZOLOMIDE |
| 649800338 | TEMOZOLOMIDE |
| 651620801 | TEMOZOLOMIDE |
| 651620802 | TEMOZOLOMIDE |
| 65160803 | TEMOZOLOMDE |
| 651620804 | TEMOZOLOMIDE |
| 651620805 | TEMOZOLOMIDE |
| 651620806 | TEMOZOLOMIDE |
| 691897638 | TEMOZOLOMIDE |
| 67870537 | TEMOZOLOMDE |
| 678770538 | TEMOZOLOMIDE |
| 678770539 | TEMOZOLOMIDE |
| 678770540 | TEMOZOLOMIDE |
| 678770541 | TEMOZOLOMIDE |
| 67870542 | TEMOZOLOMDE |
| 683820751 | TEMOZOLOMIDE |
| 683820752 | TEMOZOLOMIDE |
| 683820753 | TEMOZOLOMIDE |
| 683820754 | TEMOZOLOMIDE |
| 68380755 | TEMOZOLOMDE |
| 683820756 | TEMOZOLOMIDE |
| 427370101 | TEMOZOLOMIDE |
| 427370102 | TEMOZOLOMIDE |
| 427370103 | TEMOZOLOMIDE |
| 42730104 | TEMOZOLOMDE |
| 427370105 | TEMOZOLOMIDE |
| 427370106 | TEMOZOLOMIDE |
| 163640048 | TEMOZOLOMIDE |
| 163640049 | TEMOZOLOMIDE |
| 16360050 | TEMOZOLOMDE |
| 163640129 | TEMOZOLOMIDE |
| 163640130 | TEMOZOLOMIDE |
| 163640051 | TEMOZOLOMIDE |
| 707711095 | TEMOZOLOMIDE |
| 707711096 | TEMOZOLOMDE |
| 707711097 | TEMOZOLOMIDE |
| 707711092 | TEMOZOLOMIDE |
| 707711093 | TEMOZOLOMIDE |
| 000081179 | TEMOZOLOMIDE |
| TEMSIROLIMUS |  |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 000153075 | TENIPOSIDE |
| 445670507 | TENIPOSIDE |
| 611260507 | TENIPOSIDE |
| 595720205 | THALIDOMIDE |
| 595720210 | THALIDOMIDE |
| 595720215 | THALIDOMIDE |
| 595720220 | THALIDOMIDE |
| 001730880 | THIOGUANINE |
| 763880880 | THIOGUANINE |
| 001439565 | THIOTEPA |
| 539640001 | THIOTEPA |
| 539640002 | THIOTEPA |
| 553900030 | THIOTEPA |
| 701211630 | THIOTEPA |
| 701211631 | THIOTEPA |
| 426050015 | THIOTEPA |
| 250210246 | THIOTEPA |
| 167290243 | TOPOTECAN |
| 163640243 | TOPOTECAN |
| 000074201 | TOPOTECAN |
| 000074205 | TOPOTECAN |
| 000074207 | TOPOTECAN |
| 000690075 | TOPOTECAN |
| 000780672 | TOPOTECAN |
| 000780673 | TOPOTECAN |
| 000780674 | TOPOTECAN |
| 004090302 | TOPOTECAN |
| 007034714 | TOPOTECAN |
| 167290151 | TOPOTECAN |
| 250210206 | TOPOTECAN |
| 250210236 | TOPOTECAN |
| 250210824 | TOPOTECAN |
| 459630615 | TOPOTECAN |
| 507420404 | TOPOTECAN |
| 553900370 | TOPOTECAN |
| 627560023 | TOPOTECAN |
| 633230762 | TOPOTECAN |
| 664350410 | TOPOTECAN |
| 667580051 | TOPOTECAN |
| 674570474 | TOPOTECAN |
| 113990005 | TOREMIFENE |
| 427470327 | TOREMIFENE |
| 000073260 | TOSITUMOMAB |
| 000073261 | TOSITUMOMAB |
| 000073262 | TOSITUMOMAB |
| 596760610 | TRABECTEDIN |
| 000780666 | TRAMETINIB |
| 000780668 | TRAMETINIB |
| 001730848 | TRAMETINIB |
| 001730849 | TRAMETINIB |
| 502420333 | TRASTUZUMAB |
| 502420134 | TRASTUZUMAB |
| 502420132 | TRASTUZUMAB |
| 648421020 | TRIFLURIDINE/ TIPIRACIL |
| 648421025 | TRIFLURIDINE/ TIPIRACIL |
| 000235902 | TRIPTORELIN |


| NDC Code | Generic Drug Name |
| :---: | :---: |
| 000235904 | TRIPTORELIN |
| 000235906 | TRIPTORELIN |
| 525440154 | TRIPTORELIN |
| 525440156 | TRIPTORELIN |
| 525440092 | TRIPTORELIN |
| 525440153 | TRIPTORELIN |
| 525440188 | TRIPTORELIN |
| 525440189 | TRIPTORELIN |
| 243380150 | TRIPTORELIN |
| 679790001 | VALRUBICIN |
| 436240001 | VALRUBICIN |
| 003107810 | VANDETANIB |
| 003107820 | VANDETANIB |
| 003107830 | VANDETANIB |
| 003107840 | VANDETANIB |
| 584687820 | VANDETANIB |
| 584687840 | VANDETANIB |
| 502420090 | VEMURAFENIB |
| 000740561 | VENETOCLAX |
| 000740566 | VENETOCLAX |
| 000740576 | VENETOCLAX |
| 000740579 | VENETOCLAX |
| 553900091 | VINBLASTINE |
| 633230278 | VINBLASTINE |
| 007034402 | VINCRISTINE |
| 007034412 | VINCRISTINE |
| 617030309 | VINCRISTINE |
| 205360322 | VINCRISTINE, LIPOSOMAL |
| 000080045 | VINORELBINE |
| 000690099 | VINORELBINE |
| 000690103 | VINORELBINE |
| 000690205 | VINORELBINE |
| 007034182 | VINORELBINE |
| 007034183 | VINORELBINE |
| 250210204 | VINORELBINE |
| 459630607 | VINORELBINE |
| 553900069 | VINORELBINE |
| 553900070 | VINORELBINE |
| 578843003 | VINORELBINE |
| 617030341 | VINORELBINE |
| 643700210 | VINORELBINE |
| 643700250 | VINORELBINE |
| 643700532 | VINORELBINE |
| 667580045 | VINORELBINE |
| 674570431 | VINORELBINE |
| 674570479 | VINORELBINE |
| 674570481 | VINORELBINE |
| 674570482 | VINORELBINE |
| 502420140 | VISMODEGIB |
| 000060568 | VORINOSTAT |
| 000245840 | ZIV-AFLIBERCEPT |
| 000245841 | ZIV-AFLIBERCEPT |

## Appendix D: Cancer Mapping - ICD-9 Codes

| Cancer Type | Recon Eligible | $\begin{aligned} & \text { ICD-9 } \\ & \text { Code } \end{aligned}$ | Cancer Type | Recon Eligible | $\begin{aligned} & \text { ICD-9 } \\ & \text { Code } \end{aligned}$ |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Acute Leukemia | Yes | 204.0x | Chronic myelomonocytic leukemia | No | 206.1x |
|  |  | 205.00 | CNS Tumor | Yes | 191.xx |
|  |  | 205.01 |  |  | 192.0x |
|  |  | 205.02 |  |  | 192.1x |
|  |  | 205.3x |  |  | 192.2x |
|  |  | 206.0x |  |  | 192.3x |
|  |  | 207.0x |  |  | 192.8x |
|  |  | 207.2x |  |  | 192.9x |
|  |  | 208.0x | Endocrine Tumor | Yes | 209.30 |
| Acute panmyelosis with myelofibrosis | No | no |  |  | 193.xx |
|  |  | codes |  |  | 194.0x |
| Anal Cancer | Yes | 154.2x |  |  | 194.1x |
|  |  | 154.3x |  |  | 194.3x |
|  |  | 154.8x |  |  | 194.4x |
| Atypical chronic myeloid leukemia, BCR/ABL negative | No | 205.2x |  |  | 194.5x |
| Bladder Cancer | Yes | 188.xx |  |  | 194.8x |
|  |  | 189.1x |  |  | 194.9x |
|  |  | 189.2x |  |  | 209.0x |
|  |  | 189.3x |  |  | 209.1x |
|  |  | 189.4x |  |  | 209.2x |
|  |  | 189.8x |  |  |  |
|  |  | $189.9 x$ | thrombocythemia | No | 238.71 |
| Breast Cancer | Yes | 174.xx | Female GU Cancer other than Ovary | Yes | 179.xx |
|  |  | 175.xx |  |  | 180.xx |
| Carcinoma in situ of breast | No | 233.0x |  |  | 182.xx |
| Carcinoma in situ of cervix uteri | No | 233.1x |  |  | 184.0x |
| Carcinoma in situ of middle ear and respiratory system | No | 231.xx |  |  | 184.1 x 184.2 x |
| Carcinoma in situ of oral cavity, esophagus and stomach | No | 230.0x |  |  | 184.3 x |
|  |  | $\begin{aligned} & 230.1 x \\ & 230.2 x \end{aligned}$ |  |  | 184.4 x |
|  |  |  | Gastro/Esophageal Cancer | Yes | 150.xx |
| Carcinoma in situ of other and unspecified digestive organs | No | $\begin{aligned} & 230.3 x \\ & 230.4 x \end{aligned}$ | Gastro/Esophageal Cancer | Yes | 151.xx |
|  |  | 230.4 x | Head and Neck Cancer | Yes | 140.xx |
|  |  | 230.5x |  |  | 141.0x |
|  |  | 230.6x |  |  | 141.1x |
|  |  | 230.7x |  |  | 141.2x |
|  |  | 230.9x |  |  | 141.3x |
| Carcinoma in situ of other and unspecified genital organs | No | 233.2x |  |  | 141.5 x |
|  |  | 233.3x |  |  | 141.6x |
|  |  | 233.4x |  |  | 141.8x |
|  |  | 233.5x |  |  | 141.9x |
|  |  | 233.6x |  |  | 142.0x |
| Carcinoma in situ of other and unspecified sites | No | 233.7x |  |  | 142.1x |
|  |  | $233.9 x$ |  |  | 142.2x |
|  |  | 234.xx |  |  | 142.8x |
| Carcinoma in situ of skin | No | 232.xx |  |  | 142.9 x |
| Chronic Leukemia | Yes | $\begin{aligned} & 204.1 x \\ & 205.1 x \end{aligned}$ |  |  | 143.xx |
| Chronic leukemia of unspecified cell type | No | 208.1x |  |  | 144.xx 145.0x |


| Cancer Type | Recon Eligible | ICD-9 Code | Cancer Type | Recon Eligible | ICD-9 Code |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Head and Neck Cancer (con't) | Yes | 145.1x |  |  | 162.8x |
|  |  | 145.2x | Lung Cancer (con't) | Yes | 162.9x |
|  |  | 145.3x |  |  | 165.xx |
|  |  | 145.4x | Lymphoid Leukemia, unspecified | No | 204.9x |
|  |  | 145.5x | Lymphoma | Yes | 202.80 |
|  |  | 145.6x |  |  | 202.81 |
|  |  | 145.8x |  |  | 202.82 |
|  |  | 145.9x |  |  | 202.83 |
|  |  | 146.0x |  |  | 202.84 |
|  |  | 146.1x |  |  | 202.85 |
|  |  | 146.2x |  |  | 202.86 |
|  |  | 146.3x |  |  | 202.87 |
|  |  | 146.4x |  |  | 202.88 |
|  |  | 146.5x |  |  | 203.80 |
|  |  | 146.6x |  |  | 203.82 |
|  |  | 146.7x |  |  | 200.0x |
|  |  | 146.8x |  |  | 200.1x |
|  |  | 146.9x |  |  | 200.2x |
|  |  | 147.xx |  |  | 200.3x |
|  |  | 148.0x |  |  | 200.4x |
|  |  | 148.1x |  |  | 200.5x |
|  |  | 148.2x |  |  | 200.6x |
|  |  | 148.3x |  |  | 200.7x |
|  |  | 148.8x |  |  | 200.8x |
|  |  | 148.9x |  |  | 201.xx |
|  |  | 149.xx |  |  | 202.0x |
|  |  | 160.0x |  |  | 202.1x |
|  |  | 160.1x |  |  | 202.2x |
|  |  | 160.2x |  |  | 202.4x |
|  |  | 160.3x |  |  | 202.7x |
|  |  | 160.4x |  |  | 273.3x |
|  |  | 160.5x | Malignant Melanoma | Yes | 172.xx |
|  |  | 160.8x | Malignant neoplasm of abdomen | No | 195.2x |
|  |  | 160.9x | Malignant neoplasm of bone and articular cartilage of limbs | No | 170.4x |
|  |  | 161.xx |  |  | 170.5x |
|  |  | 162.0x |  |  | 170.7x |
|  |  | 190.xx |  |  | 170.8x |
|  |  | 195.0x | Malignant neoplasm of bone and articular cartilage of other and unspecified sites | No | 170.0x |
| Juvenile myelomonocytic leukemia | No | no codes |  |  | 170.1 x 170.2 x |
| Kaposi's sarcoma | No | 176.xx |  |  | 170.3x |
| Kidney Cancer | Yes | 189.0x |  |  | 170.6x |
| Leukemia, unspecified | No | 208.2x |  |  | 170.9x |
|  |  | 208.8x | Malignant neoplasm of heart, mediastinum and pleura | No | 163.xx |
|  |  | 208.9x |  |  | 164.1x |
| Liver Cancer | Yes | 155.xx |  |  | 164.2x |
|  |  | 156.0x |  |  | 164.3x |
|  |  | 156.1x |  |  | 164.8x |
|  |  | 156.2x |  |  | 164.9x |
|  |  | 156.8x | Malignant neoplasm of lower limb | No | 195.5x |
|  |  | 156.9x | Malignant neoplasm of other and | No | 159.xx |
|  | Yes | 162.2x | ill-defined digestive organs | No | 159.xx |
| Lung Cancer |  | 162.3x | Malignant neoplasm of other and unspecified female genital organs | No | 183.2x |
|  |  | 162.4 x |  |  | 183.3x |
|  |  | 162.5x |  |  | 183.4x |


| Cancer Type | Recon Eligible | ICD-9 <br> Code |
| :---: | :---: | :---: |
|  |  | 183.5x |
|  |  | 183.8x |
|  |  | 183.9x |
|  |  | 184.8x |
|  |  | 184.9x |
| Malignant neoplasm of other specified ill-defined sites | No | 195.8x |
| Malignant neoplasm of pelvis | No | 195.3x |
|  |  | 187.1x |
|  |  | 187.2x |
|  |  | 187.3x |
|  |  | 187.4x |
| Malignant neoplasm of penis, other, and unspecific male organs | No | 187.5x |
| other, and unspecific male organs |  | 187.6x |
|  |  | 187.7x |
|  |  | 187.8x |
|  |  | 187.9x |
|  |  | 171.0x |
|  |  | 171.2x |
|  |  | 171.3x |
| Malignant neoplasm of peripheral |  | 171.4x |
| nerves, autonomic nervous system, and other and connective soft | No | 171.5x |
| tissue |  | 171.6x |
|  |  | 171.7x |
|  |  | 171.8x |
|  |  | 171.9x |
| Malignant neoplasm of placenta | No | 181.xx |
| Malignant neoplasm of retroperitoneum and peritoneum | No | 158.xx |
| Malignant neoplasm of testis | No | 186.xx |
| Malignant neoplasm of thorax | No | 195.1x |
| Malignant neoplasm of thymus | No | 164.0x |
| Malignant neoplasm of upper limb | No | 195.4x |
| Malignant neoplasm without specification of site | No | 199.xx |
|  |  | 238.72 |
| MDS | Yes | 238.73 |
| MDS | Yes | 238.74 |
|  |  | 238.75 |
| Melanoma in situ | No | no |
| Melanoma in situ |  | codes |
|  |  | 209.31 |
|  |  | 209.32 |
| Merkel cell carcinoma | No | 209.33 |
| Merkel cell carcinoma | No | 209.34 |
|  |  | 209.35 |
|  |  | 209.36 |
|  |  | 206.2x |
| Monocytic Leukemia, unspecified | No | 206.9x |
|  |  | 203.81 |
| Multiple Myeloma | Yes | 203.0x |
|  |  | 203.1x |
| Myelofibrosis | No | 289.83 |
| Myeloid leukemia, unspecified | No | 205.9x |
| Osteomyelofibrosis | No | 238.76 |


| Cancer Type | Recon Eligible | ICD-9 Code |
| :---: | :---: | :---: |
|  |  | 289.89 |
| Other and unspecified malignant neoplasm of skin | No | 173.xx |
| Other and unspecified malignant |  | 202.3x |
| neoplasms of lymphoid, | No | 202.5x |
| hematopoietic and related tissue |  | 202.6x |
|  |  | 202.9x |
|  | No | 204.2x |
| Other lymphoid leukemia | No | 204.8x |
| Other monocytic leukemia | No | 206.8x |
| Other myeloid leukemia | No | 205.8x |
| Other specified leukemias | No | 207.8x |
| Ovarian Cancer | Yes | 183.0x |
| Pancreatic Cancer | Yes | 157.xx |
|  |  | 207.10 |
| Polycythemia vera | No | 207.11 |
| Polycythemia vera | No | 207.12 |
|  |  | 238.4x |
| Prostate Cancer | Yes | 185.xx |
| Secondary and unspecified malignant neoplasm of lymph nodes | No | 196.xx |
| Secondary malignant neoplasm of other and unspecified sites | No | 198.xx |
| Secondary malignant neoplasm of respiratory and digestive organs | No | 197.xx |
| Secondary neuroendocrine tumors | No | 209.7x |
| Small Intestine / Colorectal Cancer | Yes | 152.xx |
|  |  | 153.xx |
|  |  | 154.0x |
|  |  | 154.1x |

## Appendix E: Cancer Mapping - ICD-10 Code



| Cancer Type | Recon Eligible | $\begin{aligned} & \text { ICD-10 } \\ & \text { Code } \end{aligned}$ |
| :---: | :---: | :---: |
| Malignant neoplasm of bone and articular cartilage of other and unspecified sites | No | C41.xx |
| Malignant neoplasm of heart, mediastinum and pleura | No | C38.xx |
| Malignant neoplasm of lower limb | No | C76.5x |
| Malignant neoplasm of other and ill-defined digestive organs | No | C26.xx |
| Malignant neoplasm of other and unspecified female genital organs | No | C57.xx |
| Malignant neoplasm of other specified ill-defined sites | No | C76.8x |
| Malignant neoplasm of pelvis | No | C76.3x |
| Malignant neoplasm of penis, other, and unspecific male organs | No | $\begin{aligned} & \hline \text { C60.xx } \\ & \text { C63.xx } \end{aligned}$ |
| Malignant neoplasm of peripheral nerves, autonomic nervous system, and other and connective soft tissue | No | C47.xx C49.xx |
| Malignant neoplasm of placenta | No | C58.xx |
| Malignant neoplasm of retroperitoneum and peritoneum | No | C48.xx |
| Malignant neoplasm of testis | No | C62.xx |
| Malignant neoplasm of thorax | No | C76.1x |
| Malignant neoplasm of thymus | No | C37.xx |
| Malignant neoplasm of upper limb | No | C76.4x |
| Malignant neoplasm without specification of site | No | C80.xx |
| MDS | Yes | $\begin{aligned} & \hline \text { C94.6x } \\ & \text { D46.xx } \end{aligned}$ |
| Melanoma in situ | No | D03.xx |
| Merkel cell carcinoma | No | C4A. xx |
| Monocytic Leukemia, unspecified | No | C93.9x |
| Multiple Myeloma | Yes | C90.xx |
| Myelofibrosis | No | D75.81 |
| Myeloid leukemia, unspecified | No | C92.9x |
| Osteomyelofibrosis | No | D47.4x |
| Other and unspecified malignant neoplasm of skin | No | C44.xx |
| Other and unspecified malignant neoplasms of lymphoid, hematopoietic and related tissue | No | C96.xx |
| Other lymphoid leukemia | No | C91.zx |
| Other monocytic leukemia | No | C93.zx |
| Other myeloid leukemia | No | C92.zx |
| Other specified leukemias | No | C94.8x |
| Ovarian Cancer | Yes | C56.xx |
| Pancreatic Cancer | Yes | C25.xx |
| Polycythemia vera | No | D45.xx |
| Prostate Cancer | Yes | C61.xx |
| Secondary and unspecified malignant neoplasm of lymph nodes | No | C77.xx |
| Secondary malignant neoplasm of other and unspecified sites | No | C79.xx |
| Secondary malignant neoplasm of respiratory and digestive organs | No | C78.xx |


| Cancer Type | Recon <br> Eligible | ICD-10 <br> Code |
| :--- | :--- | :--- |
| Secondary neuroendocrine tumors | No | C7B.xx |
|  |  | C17.xx |
| Small Intestine / Colorectal Cancer | Yes | C18.xx |
|  |  | C19.xx |
|  |  | C20.xx |

## Appendix F: Castration-Sensitive Prostate Cancer Drug Codes

| Code Type | Code | Generic Drug Name |
| :---: | :---: | :---: |
| HCPCS | J9155 | DEGARELIX |
| HCPCS | J9202 | GOSERELIN |
| HCPCS | J1675 | HISTRELIN |
| HCPCS | J9225 | HISTRELIN |
| HCPCS | J1950 | LEUPROLIDE |
| HCPCS | J9217 | LEUPROLIDE |
| HCPCS | J9218 | LEUPROLIDE |
| HCPCS | J9219 | LEUPROLIDE |
| HCPCS | C9016 | TRIPTORELIN |
| HCPCS | J3315 | TRIPTORELIN |
| NDC | 000930220 | BICALUTAMIDE |
| NDC | 003100705 | BICALUTAMIDE |
| NDC | 003787017 | BICALUTAMIDE |
| NDC | 007815409 | BICALUTAMIDE |
| NDC | 009046019 | BICALUTAMIDE |
| NDC | 167140571 | BICALUTAMIDE |
| NDC | 167290023 | BICALUTAMIDE |
| NDC | 416160485 | BICALUTAMIDE |
| NDC | 510790692 | BICALUTAMIDE |
| NDC | 519910560 | BICALUTAMIDE |
| NDC | 521250709 | BICALUTAMIDE |
| NDC | 548684503 | BICALUTAMIDE |
| NDC | 548686133 | BICALUTAMIDE |
| NDC | 604290226 | BICALUTAMIDE |
| NDC | 605052642 | BICALUTAMIDE |
| NDC | 636720005 | BICALUTAMIDE |
| NDC | 658410613 | BICALUTAMIDE |
| NDC | 672530191 | BICALUTAMIDE |
| NDC | 680840374 | BICALUTAMIDE |
| NDC | 680840612 | BICALUTAMIDE |
| NDC | 683820224 | BICALUTAMIDE |
| NDC | 621750132 | BICALUTAMIDE |
| NDC | 163640023 | BICALUTAMIDE |
| NDC | 163640091 | BICALUTAMIDE |
| NDC | 605053542 | BICALUTAMIDE |
| NDC | 422910168 | BICALUTAMIDE |
| NDC | 473350485 | BICALUTAMIDE |
| NDC | 604290177 | BICALUTAMIDE |
| NDC | 636295321 | BICALUTAMIDE |
| NDC | 691890298 | BICALUTAMIDE |
| NDC | 555668301 | DEGARELIX |
| NDC | 555668303 | DEGARELIX |
| NDC | 555668401 | DEGARELIX |
| NDC | 555668403 | DEGARELIX |
| NDC | 001724960 | FLUTAMIDE |
| NDC | 005912466 | FLUTAMIDE |
| NDC | 498840753 | FLUTAMIDE |
| NDC | 604290272 | FLUTAMIDE |
| NDC | 690970915 | FLUTAMIDE |
| NDC | 001851125 | FLUTAMIDE |
| NDC | 000850525 | FLUTAMIDE |

## Appendix G: Low-Risk Bladder Cancer Drug Codes

| Code Type | Code | Generic Drug Name |
| :--- | :--- | :--- |
| HCPCS | J9031 | BCG (INTRAVESICAL) PER INSTILLATION |
| HCPCS | J9280 | MITOMYCIN |
| HCPCS | J9290 | MITOMYCIN |
| HCPCS | J9291 | MITOMYCIN |
| NDC | 000520602 | BCG (BACILLUS CALMETTE-GUERIN) LIVE VAX, intravesical |
| NDC | 492810880 | BCG LIVE VAX, intravesical |
| NDC | 167290108 | MITOMYCIN |
| NDC | 167290115 | MITOMYCIN |
| NDC | 167290116 | MITOMYCIN |
| NDC | 167290246 | MITOMYCIN |
| NDC | 167290247 | MITOMYCIN |
| NDC | 167290248 | MITOMYCIN |
| NDC | 497710002 | MITOMYCIN |
| NDC | 553900251 | MITOMYCIN |
| NDC | 553900252 | MITOMYCIN |
| NDC | 553900253 | MITOMYCIN |
| NDC | 553900451 | MITOMYCIN |
| NDC | 553900452 | MITOMYCIN |
| NDC | 553900453 | MITOMYCIN |
| NDC | 694480001 | MITOMYCIN |
| NDC | 694480002 | MITOMYCIN |
| NDC | 694480003 | MITOMYCIN |
| NDC | 000153001 | MITOMYCIN |
| NDC | 000153002 | MITOMYCIN |
| NDC | 000153059 | MITOMYCIN |
| NDC | 163640116 | MITOMYCIN |
| NDC | 163640108 | MITOMYCIN |
| NDC | 163640115 | MITOMYCIN |
| NDC | 597650116 | MITOMYCIN |
| NDC | 597650108 | MITOMYCIN |
| NDC | 597650115 | MITOMYCIN |

## Appendix H: Low-Risk Breast Cancer NDC Codes

| NDC Code | Generic Drug Name |
| :---: | :---: |
| 000540164 | ANASTROZOLE |
| 000937536 | ANASTROZOLE |
| 001790068 | ANASTROZOLE |
| 003100201 | ANASTROZOLE |
| 003786034 | ANASTROZOLE |
| 007815356 | ANASTROZOLE |
| 009046195 | ANASTROZOLE |
| 009046229 | ANASTROZOLE |
| 165710421 | ANASTROZOLE |
| 167290035 | ANASTROZOLE |
| 216950990 | ANASTROZOLE |
| 420430180 | ANASTROZOLE |
| 422540161 | ANASTROZOLE |
| 430630383 | ANASTROZOLE |
| 510790323 | ANASTROZOLE |
| 516550638 | ANASTROZOLE |
| 519910620 | ANASTROZOLE |
| 545696198 | ANASTROZOLE |
| 500901193 | ANASTROZOLE |
| 500901918 | ANASTROZOLE |
| 500902005 | ANASTROZOLE |
| 500902118 | ANASTROZOLE |
| 500902453 | ANASTROZOLE |
| 548685000 | ANASTROZOLE |
| 548686130 | ANASTROZOLE |
| 551110647 | ANASTROZOLE |
| 602580866 | ANASTROZOLE |
| 604290286 | ANASTROZOLE |
| 605052985 | ANASTROZOLE |
| 606870112 | ANASTROZOLE |
| 607630376 | ANASTROZOLE |
| 621750710 | ANASTROZOLE |
| 627560250 | ANASTROZOLE |
| 631870080 | ANASTROZOLE |
| 633230129 | ANASTROZOLE |
| 636295269 | ANASTROZOLE |
| 636720015 | ANASTROZOLE |
| 658410743 | ANASTROZOLE |
| 663360533 | ANASTROZOLE |


| NDC Code | Generic Drug <br> Name |
| :--- | :--- |
| 664350415 | ANASTROZOLE |
| 678770171 | ANASTROZOLE |
| 680010155 | ANASTROZOLE |
| 680840448 | ANASTROZOLE |
| 683820209 | ANASTROZOLE |
| 691890035 | ANASTROZOLE |
| 620330376 | ANASTROZOLE |
| 422910105 | ANASTROZOLE |
| 001151261 | ANASTROZOLE |
| 638500010 | ANASTROZOLE |
| 163640035 | ANASTROZOLE |
| 687886774 | ANASTROZOLE |
| 680711682 | ANASTROZOLE |
| 000097663 | EXEMESTANE |
| 000540080 | EXEMESTANE |
| 003785001 | EXEMESTANE |
| 477810108 | EXEMESTANE |
| 548685261 | EXEMESTANE |
| 597622858 | EXEMESTANE |
| 606870132 | EXEMESTANE |
| 108297663 | EXEMESTANE |
| 108292858 | EXEMESTANE |
| 008320595 | EXEMESTANE |
| 000540269 | LETROZOLE |
| 000780249 | LETROZOLE |
| 000937620 | LETROZOLE |
| 003782071 | LETROZOLE |
| 006034180 | LETROZOLE |
| 167290034 | LETROZOLE |
| 245350801 | LETROZOLE |
| 247240030 | LETROZOLE |
| 422540243 | LETROZOLE |
| 519910759 | LETROZOLE |
| 548684151 | LETROZOLE |
| 548686252 | LETROZOLE |
| 551110646 | LETROZOLE |
| 578842021 | LETROZOLE |
| 605053255 | LETROZOLE |
| 621750888 | LETROZOLE |
| 063 |  |


| NDC Code | Generic Drug <br> Name |
| :--- | :--- |
| 627560511 | LETROZOLE |
| 633230772 | LETROZOLE |
| 658410744 | LETROZOLE |
| 683820363 | LETROZOLE |
| 422910373 | LETROZOLE |
| 638500025 | LETROZOLE |
| 163640034 | LETROZOLE |
| 004807620 | LETROZOLE |
| 621470237 | LETROZOLE |
| 691897620 | LETROZOLE |
| 001790169 | LETROZOLE |
| 005271712 | LETROZOLE |
| 422910374 | LETROZOLE |
| 680840803 | LETROZOLE |
| 000930784 | TAMOXIFEN |
| 001790224 | TAMOXIFEN |
| 001791952 | TAMOXIFEN |
| 003780144 | TAMOXIFEN |
| 003780274 | TAMOXIFEN |
| 005912233 | TAMOXIFEN |
| 005912472 | TAMOXIFEN |
| 005912473 | TAMOXIFEN |
| 136320123 | TAMOXIFEN |
| 548683004 | TAMOXIFEN |
| 548684287 | TAMOXIFEN |
| 636294413 | TAMOXIFEN |
| 637390269 | TAMOXIFEN |
| 680840924 | TAMOXIFEN |
| 680840935 | TAMOXIFEN |
| 000930782 | TAMOXIFEN |
| 518620446 | TAMOXIFEN |
| 518620447 | TAMOXIFEN |
| 518620449 | TAMOXIFEN |
| 518620450 | TAMOXIFEN |
| 604290909 | TAMOXIFEN |
| 604290910 | TAMOXIFEN |
|  |  |
|  |  |
| 6 |  |

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Milliman is among the world's largest providers of actuarial and related products and services. The firm has consulting practices in life insurance and financial services, property \& casualty insurance, healthcare, and employee benefits. Founded in 1947, Milliman is an independent firm with offices in major cities around the globe.
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[^0]:    ${ }^{1}$ In most states, "reinsurance" purchased by physician groups is not reinsurance, but "stop-loss insurance." For purposes of this report, this technicality will be ignored and risk protection policies purchased by providers are referred to as "reinsurance."
    2 Throughout this paper, "medical cost" (or "FFS cost") is defined as claim cost from the perspective of a claims payer, whether an employer, an insurer, or CMS. It is not meant to reflect the direct cost incurred by medical providers to provide care.
    ${ }^{3}$ The assumption that required medical savings incorporated in the target rate calculation are a reasonable approximation of the expected achieved savings will be referred to throughout the report as the "unbiased" scenario.

[^1]:    4 "Winsorization" applies a limit to extreme values. For example, winsorization at $\$ 100,000$ would mean all values exceeding $\$ 100,000$ would be treated as though they were exactly $\$ 100,000$.

[^2]:    ${ }^{5}$ CMS. Oncology Care Model. Retrieved March 6, 2019, from https://innovation.cms.gov/initiatives/oncology-care/.
    ${ }^{6}$ CMS (February 2019). Oncology Care Model Overview. Retrieved March 6, 2019, from https://innovation.cms.gov/files/slides/ocm-overview-slides.pdf.
    ${ }^{7}$ CMS, Oncology Care Model Overview, ibid.
    ${ }^{8}$ American Cancer Society Cancer Action Network. The Costs of Cancer: Addressing Patient Costs. Retrieved March 6, 2019, from https://www.fightcancer.org/sites/default/files/Costs\%20of\%20Cancer\%20-\%20Final\%20Web.pdf.
    ${ }^{9}$ CMS, Oncology Care Model Overview, op cit.
    ${ }^{10}$ CMS (December 17, 2018). OCM Performance-Based Payment Methodology. Retrieved March 6, 2019, from
    https://innovation.cms.gov/Files/x/ocm-pp3beyond-pymmeth.pdf.
    ${ }^{11}$ CMS, OCM Performance-Based Payment Methodology, ibid.

[^3]:    ${ }^{12}$ CMS, Oncology Care Model Overview, op cit.
    ${ }^{13}$ CMS, Oncology Care Model Overview, ibid.
    ${ }^{14}$ CMS, Oncology Care Model Overview, ibid.
    ${ }^{15}$ CMS. Quality Payment Program. Advanced Alternative Payment Models. Retrieved March 6, 2019, from https://qpp.cms.gov/apms/advanced-apms.

[^4]:    ${ }^{16}$ The $X^{\text {th }}$ percentile represents the gain a given physician group will exceed $X \%$ of the time. Alternatively, the group will have losses greater than the $X^{\text {h }}$ percentile $(100--X) \%$ of the time. For example, according to Figure 3, a small non-hospital-affiliated practice would achieve a gain of $5.1 \%$ or more $25 \%$ of the time. This is not necessarily equivalent to saying that a particular physician group is in the $X^{\text {th }}$ percentile of all physicians, although the two may be correlated with one another.

[^5]:    The $\$ 100,000$ in total specific reimbursement is compared to the ASD of $\$ 75,000$ : The excess amount is $\$ 25,000$, which is the final reimbursement.

[^6]:    17 Defined as (100\% - expected reimbursements as a percentage of premium).

[^7]:    18 See Section 3 for description.

[^8]:    19 The mean understatement is intended to represent a physician group that is not able to achieve any meaningful medical savings, but is still subject to the discount incorporated in the reconciliation calculation.

