# MACRA Implementation: A Review of the Quality Payment Program Final Rule



#### Ashby Wolfe, MD, MPP, MPH

Chief Medical Officer, Region IX Centers for Medicare and Medicaid Services



Presentation to the California Medical Association November 30, 2016

Quality Payment Program

#### Disclaimer

This presentation was prepared as a tool to assist providers and is not intended to grant rights or impose obligations. Although every reasonable effort has been made to assure the accuracy of the information within these pages, the ultimate responsibility for the correct submission of claims and response to any remittance advice lies with the provider of services.

This publication is a general summary that explains certain aspects of the Medicare Program, but is not a legal document. The official Medicare Program provisions are contained in the relevant laws, regulations, and rulings. Medicare policy changes frequently, and links to the source documents have been provided within the document for your reference

The Centers for Medicare & Medicaid Services (CMS) employees, agents, and staff make no representation, warranty, or guarantee that this compilation of Medicare information is error-free and will bear no responsibility or liability for the results or consequences of the use of this guide.

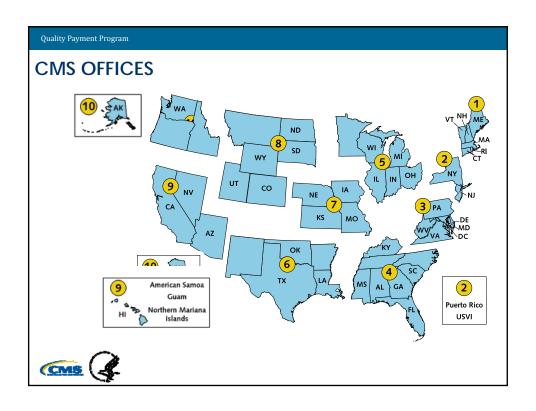


## **Objectives**

- Overview of CMS Priorities
  - Shifting from Volume to Value-Based payments
  - Program alignment and streamlining
- Health System Transformation: MACRA 2015
  - Review of the Medicare Access and CHIP Reauthorization Act
  - The Quality Payment Program Final Rule
- Key updates and resources
  - Options for participation in 2017



Opportunities for technical support





## Better. Smarter. Healthier.

So we will continue to work across sectors and across the aisle for the goals we share: <u>better care, smarter spending, and healthier people</u>

## Better Care, Smarter Spending, Healthier People

#### **Focus Areas**

#### Description

#### Incentives

- Promote value-based payment systems
  - Test new alternative payment models
  - Increase linkage of Medicaid, Medicare FFS, and other payments to value
- Bring proven payment models to scale

## Care Delivery

- Encourage the integration and coordination of services
- Improve population health
- Promote patient engagement through shared decision making

#### Information

- Create transparency on cost and quality information
- Bring electronic health information to the point of care for meaningful use

Source: Burwell SM. Setting Value-Based Payment Goals – HHS Efforts to Improve U.S. Health Care. NEJM 2015 Jan 26; published online

Quality Payment Program

## CMS Health Equity Plan for Medicare



**Priority 1:** Expand the Collection, Reporting, and Analysis of **Standardized Data** 



Priority 4: Increase the Ability of the Health Care Workforce to Meet the Needs of Vulnerable Populations



Priority 2: Evaluate
Disparities Impacts and
Integrate Equity Solutions
Across CMS Programs



Priority 5: Improve
Communication &
Language Access for
Individuals with LEP &
Persons with Disabilities



Priority 3: Develop and
Disseminate Promising
Approaches to Reduce Health
Disparities



Priority 6: Increase Physical Accessibility of Health Care Facilities





Focus Areas	Ongoing work of 1	The CMS Innovation Center
Pay Providers	Test and expand alternative payment models  Accountable Care Pioneer ACO Model Medicare Shared Savings Program (housed in Center for Medicare) Advance Payment ACO Model Comprehensive ERSD Care Initiative Next Generation ACO Primary Care Transformation Comprehensive Primary Care Initiative (CPC) Multi-Payer Advanced Primary Care Practice (MAPCP) Demonstration Federally Qualified Health Center (FQHC) Advanced Primary Care Practice Demonstration Independence at Home Demonstration Graduate Nurse Education Demonstration Home Health Value Based Purchasing (proposed)	Bundled payment models Bundled Payment for Care Improvement Models 1-4 Oncology Care Model Comprehensive Care for Joint Replacement (proposed) Initiatives Focused on the Medicaid population Medicaid Imergency Psychiatric Demonstration Medicaid Incentives for Prevention of Chronic Diseases Strong Start Initiative Medicaid Innovation Accelerator Program Dual Eligible (Medicare-Medicaid Enrollees) Financial Alignment Initiative Initiative to Reduce Avoidable Hospitalizations among Nursing Facility Residents Other Medicare Care Choices Medicare Advantage Value-Based Insurance Design model Medicare Advantage Value-Based Insurance Design model  Medicare Advantage Value-Based Insurance Design Medicare Value-Based Insurance Design Medicare Value-Based Insurance Value-Based Insurance Value-Based Insurance Value-Based Insurance Value
Deliver Care Distribute	Support providers and states to improve the delivery of co  Learning and Diffusion  Partnership for Patients  Transforming Clinical Practice  Community-Based Care Transitions  Health Care Innovation Awards  Increase information available for effective informed deci	State Innovation Models Initiative SIM Round 1 SIM Round 2 Maryland All-Payer Model Million Hearts Cardiovascular Risk Reduction Model

## **Collaboration with National Partners Measure Alignment Efforts**

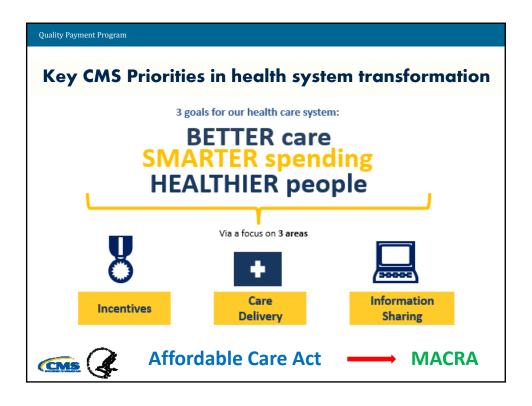
- CMS Quality Measure Development Plan
  - Highlight known measurement gaps and develop strategy to address these
  - Promote harmonization and alignment across programs, care settings, and payers
  - Assist in prioritizing development and refinement of measures
  - Public Comment period closed March 1st, final report published May 2nd
- Core Measures Sets released February 16<sup>th</sup>
  - ACOs, Patient Centered Medical Homes (PCMH), and Primary Care
  - Cardiology

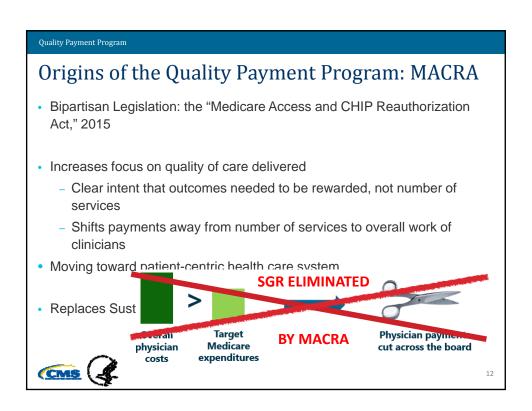
https://www.cms.gov/Medicare/Quality-Initiatives-

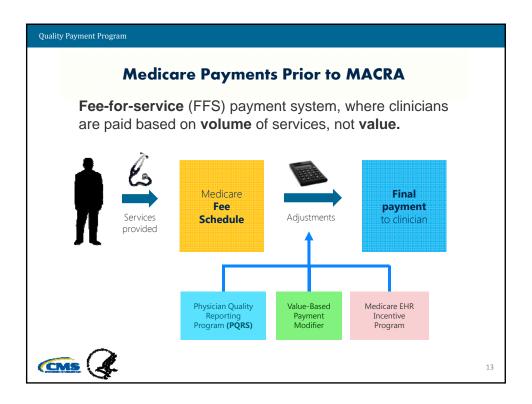
- Patient-Assessment-Instruments/QualityMeasures/Core-- HIV and Hepatitis C Measures.html
- Medical Oncology

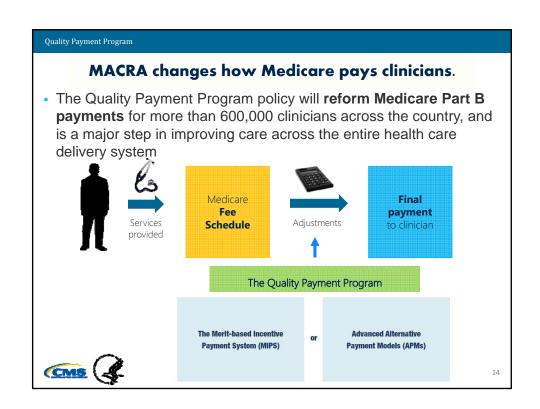
Gastroenterology

- Obstetrics and Gynecology
- Orthopedics

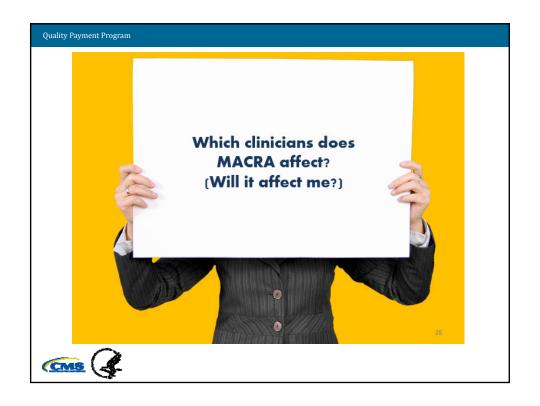










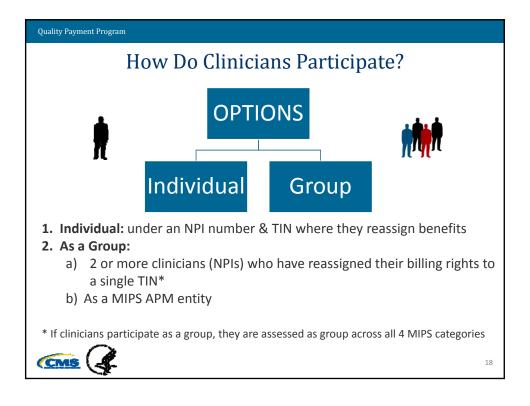


## Who participates in the Quality Payment Program?

- Medicare Part B eligible clinicians who:
  - Bill more \$30,000 a year in Medicare charges AND
  - Provide care for more than 100 Medicare Part B patients in a given year
- Eligible clinicians:

Physicians
Physician Assistants
Nurse Practitioners
Clinical Nurse Specialists
Certified Registered Nurse Anesthetists





## When Will Clinicians Learn If They Are Eligible?

#### December 2016

January 2017

CMS begins to contact clinicians

NPI Lookup Tool available on Quality Payment Program Online Portal

#### In the meantime:

- Review your Quality and Resource Use Report (QRUR)
  - https://portal.cms.gov



Update your Provider Information (NPI, PECOS, etc.)

19

The Quality Payment Program

OUALITY
PAYMENT
PROGRAM
diriction of from - particripating in an innovative payment model.

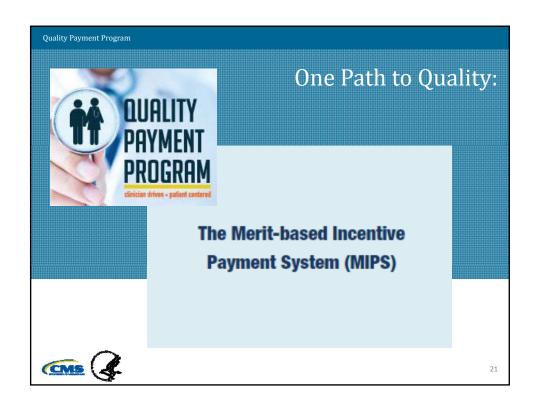
The Quality Payment Program has two tracks you can choose from:

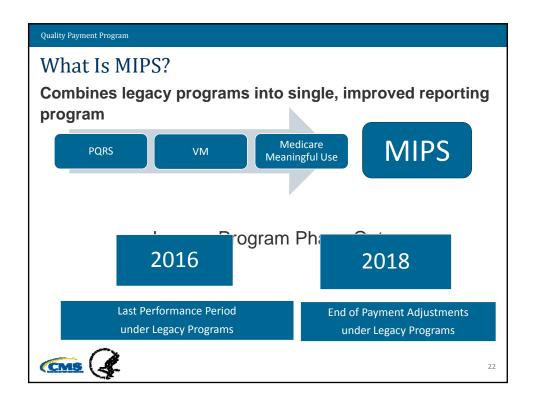
The Quality Payment Program has two tracks you can choose from:

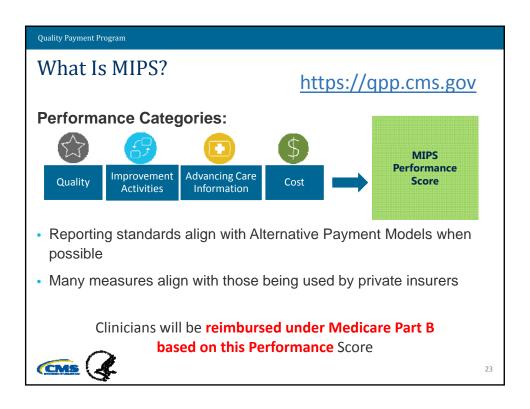
The Quality Payment Program has two tracks you can choose from:

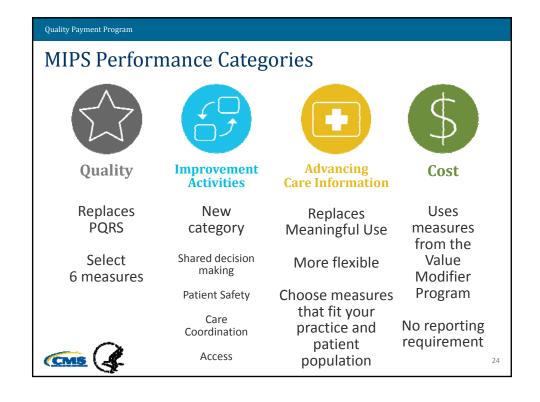
The Merit-based Incentive Payment System (MIPS)

If you decide to take part in an Advanced APM, you may earn a Medicare incentive payment for participating in an innovative payment model.



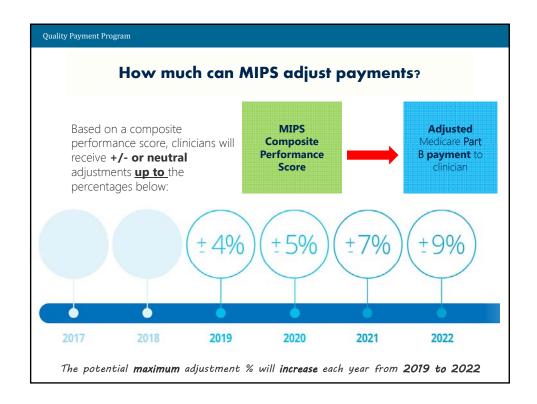


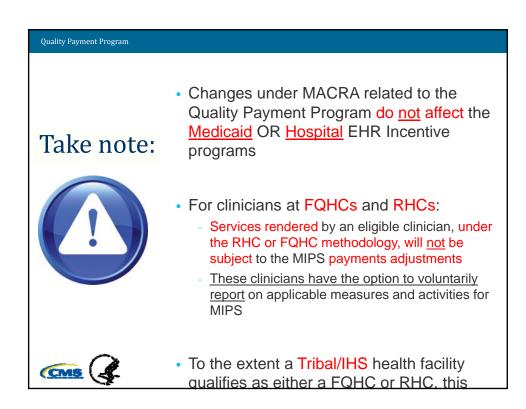




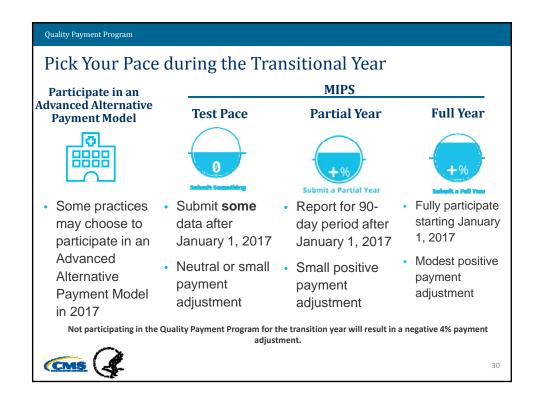


Quality Payment Program MIPS Performance Category: Quality -Reporting **Individual clinicians** may **Groups** may report report through: measures through: **Qualified Registry Qualified Registry** Electronic Health Record **EHR** (EHR) **QCDR Qualified Clinical Data** CMS Web Interface (groups Registry (QCDR) of 25 or more) Claims **CAHPS for MIPS Survey** Counts as 1patient experience measure Must submit 5 other measures through a different mechanism above









## Choosing to Test for 2017





- 1 Quality Measure (timeframe and amount of data based on measure specifications)

#### OR

1 Improvement Activity
 (timeframe and amount of data based on measure specifications)

OR

- 5 required Advancing Care Information Measures
- If you test, you can avoid a reimbursement penalty in 2019



Quality Payment Program

## Partial Participation for 2017

Submit 90 days of 2017 data to Medicare



- More than 1 Quality Measure,
- More than 1 Improvement Activity, or
- More than the 5 required Advancing Care Information measures
- You may earn a neutral or small positive payment adjustment
- If you're not ready on January 1, you can choose to start anytime between January 1 and October 2, 2017
- Send in performance data by March 31, 2018



## Full Participation for 2017



- Submit a full year of 2017 data to Medicare
- You may earn a moderate positive payment adjustment
- To earn the largest positive adjustment is to participate fully in the program by submitting information in all the MIPS performance categories.

#### **Key Takeaway:**

Payment adjustments are based on the performance data submitted, not the amount of information or length of time submitted.



Quality Payment Program

## Who is excluded from MIPS?



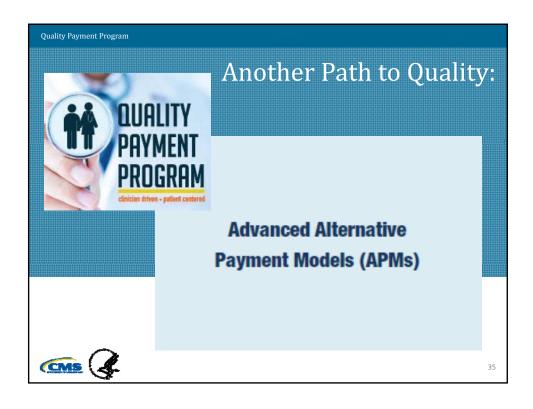
FIRST year of Medicare Part B participation

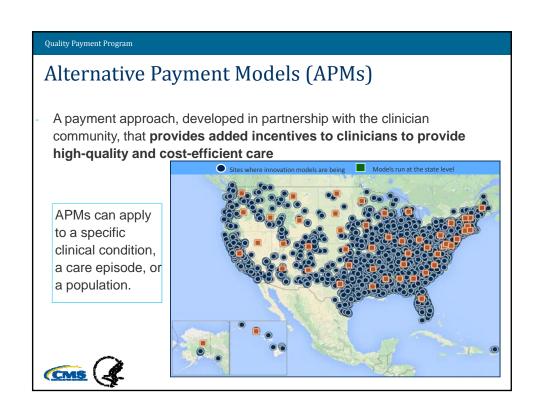
- Newly-enrolled Medicare clinicians
  - Clinicians who enroll in Medicare for the first time during a performance period are exempt from reporting on measures and activities for MIPS until the following performance year.

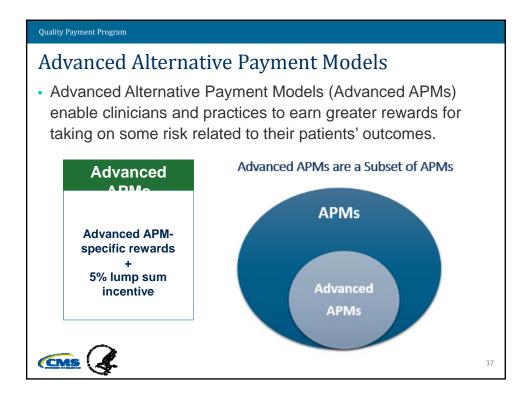


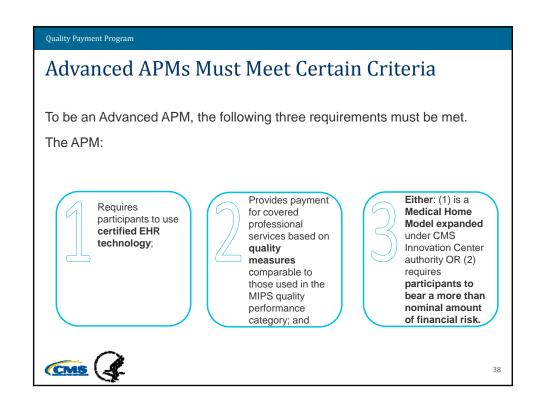


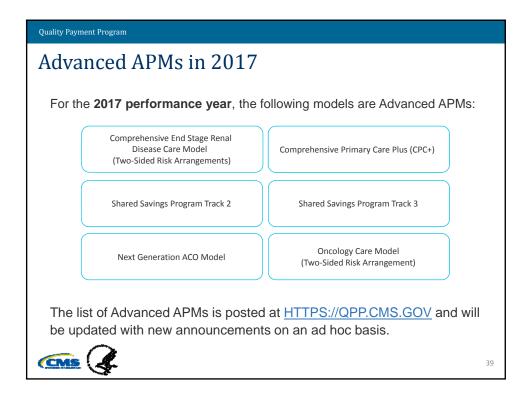
- Clinicians below the low-volume threshold
  - Medicare Part B allowed charges less than or equal to \$30,000 OR 100 or fewer Medicare Part B patients
- Clinicians significantly participating in

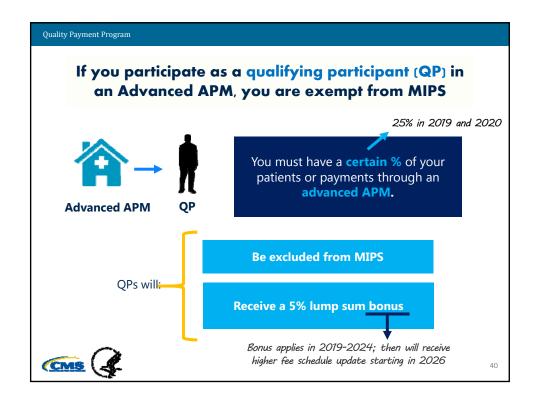












# What if Clinicians do not Meet the QP Payment or Patient Thresholds?

- Clinicians who participate to some extent in Advanced APMs, but do not meet the QP thresholds for the QP Performance Period, may be eligible to become "Partial" Qualifying APM Participants (Partial QP).
- Allows Partial QPs to choose to opt-in as an eligible clinician to the Merit-based Incentive Payment System.
  - Partial QPs will receive a MIPS Final Score and be subject to a MIPS positive or negative payment adjustment



41

Quality Payment Program

## When Will Clinicians Learn their QP Status?

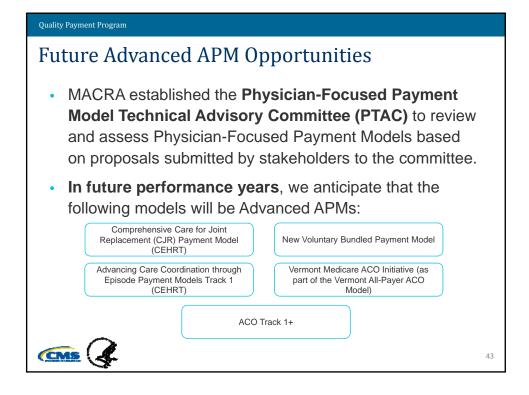


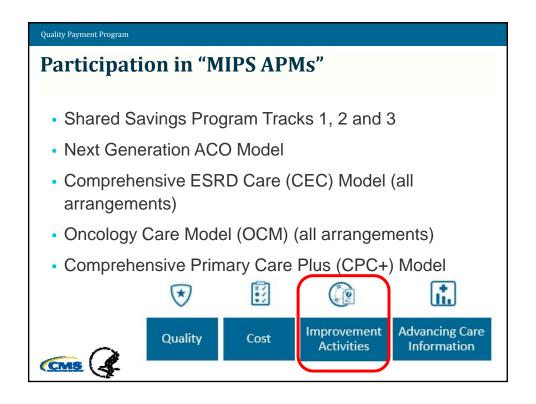


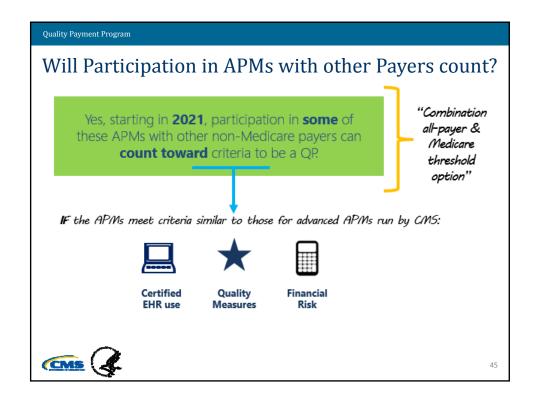


- Reaching the Qualifying APM Participant threshold at any one of the three QP determinations will result in QP status for the eligible clinicians in the Advanced APM Entity
- Eligible clinicians will be notified of their QP status after each QP snapshot.











### Easier Access for Small Practices

## Small practices will be able to successfully participate in the Quality Payment Program

#### Why?

- · Reducing the time and cost to participate
- Providing an on-ramp to participating through Pick Your Pace
- · Increasing the opportunities to participate in Advanced APMs
- Conducting technical support and outreach to small practices through the forthcoming QPP Small, Rural and Underserved Support Program as well as through the Transforming Clinical Practice Initiative.



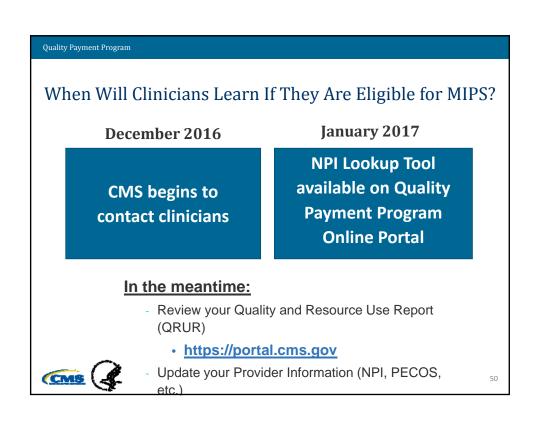
47

#### Quality Payment Program

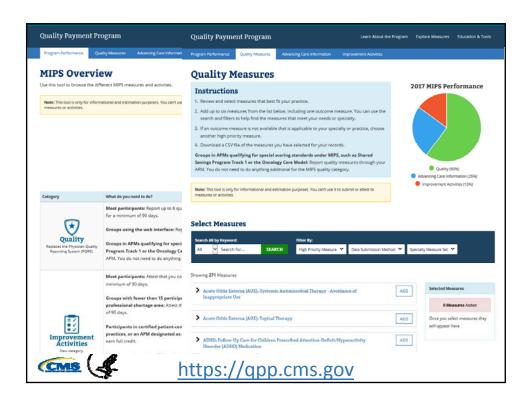
## Small, Rural and Health Professional Shortage Areas (HPSAs) Exceptions

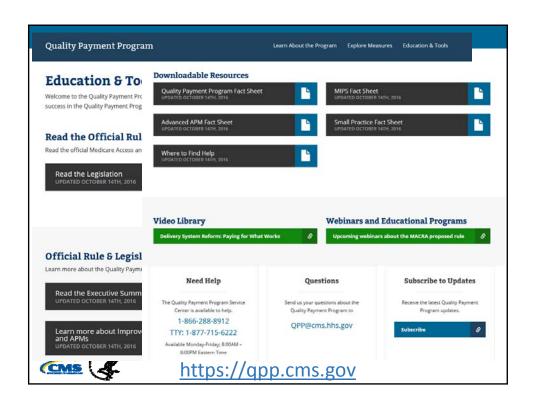
- Established low-volume threshold excludes a clinician if they:
  - Bill \$30,000 or less in Medicare Part B allowed charges **OR** see 100 or fewer Medicare patients in a given year
- Reduced requirements for Improvement Activities performance category
  - One high-weighted activity **OR** Two medium-weighted activities
- Increased ability for clinicians practicing at Critical Access Hospitals, Rural Health Clinics and Federally Qualified Health Centers to qualify as a Qualifying APM Participant (QP).













## What Support Is Available to Clinicians?

### **Integrated Technical Assistance Program**

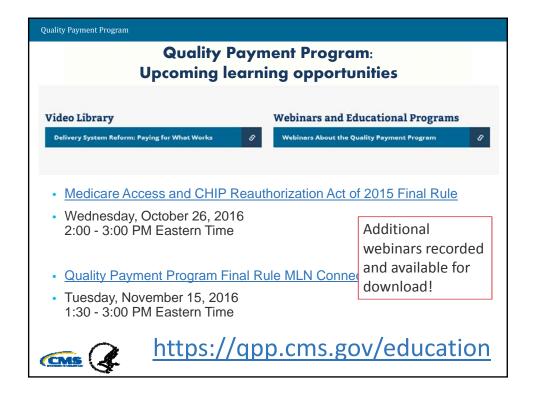
- Full-service, expert help
  - · Quality Payment Program Service Center
  - · Quality Innovation Network/Quality Improvement Organizations
  - Quality Payment Program Small, Underserved, and Rural Support
  - Transforming Clinical Practice Initiative
  - · APM Learning Networks
- Self-service
  - · QPP Online Portal

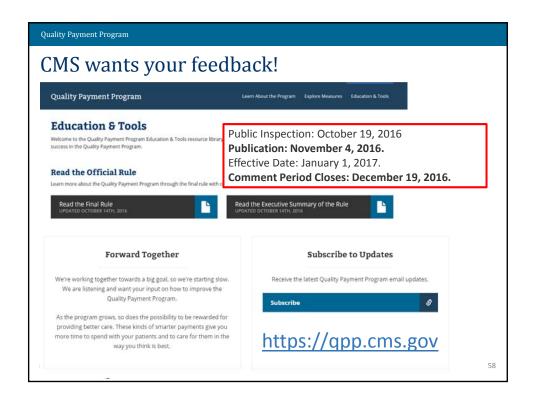
All support is FREE to clinicians



https://qpp.cms.gov/education







## Quality Payment Program: How to get help

#### **Need Help**

The Quality Payment Program Service Center is available to help.

1-866-288-8912

TTY: 1-877-715-6222

Available Monday-Friday; 8:00AM – 8:00PM Eastern Time

#### Questions

Send us your questions about the Quality Payment Program to

QPP@cms.hhs.gov

Ashby Wolfe, MD, MPP, MPH
Chief Medical Officer, Region IX
Centers for Medicare and Medicaid Services



ashby.wolfe1@cms.hhs.gov

## **Questions?**



Ashby Wolfe, MD, MPP, MPH Chief Medical Officer, CMS Region 9 San Francisco, CA

(415) 744-3631 ashby.wolfe1@cms.hhs.gov