







# Countdown to Merit-based Incentive Payment System Have You Decided? Negative, Neutral, or Positive Payment Adjustment

September 2017





## Acronyms in the Presentation

**CMS:** Centers for Medicare & Medicaid Services

EC: Eligible Clinician

MACRA: Medicare Access and CHIP\* Reauthorization Act of 2015

MIPS: Merit-based Incentive Payment System



## Agenda

- Introductions
- 2. Assumptions
- 3. Goals for today
- 4. What again is MIPS?
- 5. How does MIPS affect you?
- 6. Your pace
- 7. What to do
- 8. Sample measures
- 9. How to report
- 10. Get help! Call to action

#### Goals for Today

- ✓ Provide guidance to successfully avoid a payment reduction.
- ✓ Commitment to register for help.



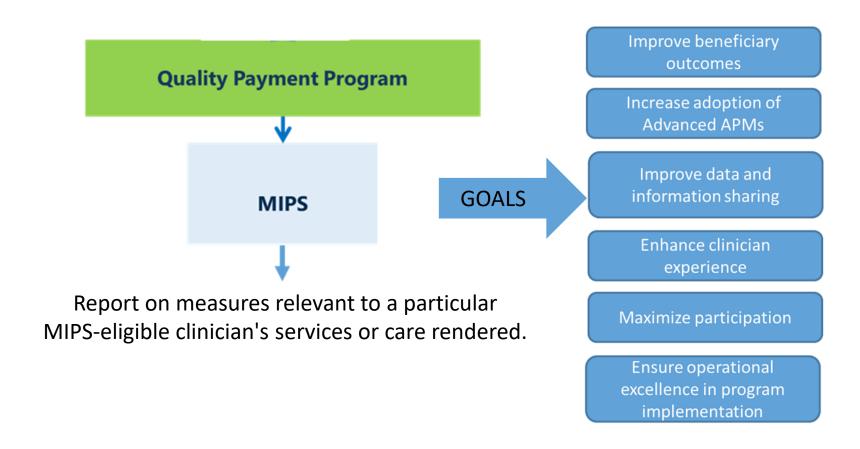
#### **Assumptions**

- ✓ You are a clinician deemed MIPS-eligible.
- ✓ Our focus is the 2017 performance year.
- ✓ No one wants a payment reduction!





## What Again is MIPS?



**Quality / Practice Improvement / Advancing Care Information / Cost** 





## How Does MIPS Affect You? Eligible Clinicians

Clinicians billing more than \$30,000 a year in Medicare Part B allowed charges

AND providing care for more than 100 Medicare patients a year.

BILLING >\$30,000

**AND** 



Weep in mind next year may be >\$90,000 and >200

#### These clinicians include:

Physicians

Physician Assistants

Nurse Practitioner Clinical Nurse Specialist Certified
Registered
Nurse
Anesthetists





## Who Is Exempt From MIPS?



## Newly-enrolled in Medicare

Enrolled in
 Medicare for the
 first time during
 the performance
 period (exempt
 until following
 performance year)

#### Clinicians who are:



#### Below the lowvolume threshold

- Medicare Part B allowed charges less than or equal to \$30,000 a year
   OR
- See 100 or fewer
   Medicare Part B
   patients a year

Advanced APM

## Significantly participating in Advanced APMs

- Receive 25% of Medicare payments
   OR
- See 20% of
   Medicare patients
   through an
   Advanced APM





## What Again is MIPS: Individual or Group Participation?

### **Individual**

 Payment adjustment will be based on your performance.

 A single clinician (a single National Provider Identifier [NPI] tied to a single Tax Identification Number [TIN])

### Group

- Payment adjustment will be based on the group's performance.
- A group is defined as a single
   TIN with 2 or more eligible
   clinicians (including at least one
   MIPS-eligible clinician), as
   identified by their NPIs, who
   have reassigned their Medicare
   billing rights to the TIN.



Use your NPI to verify https://qpp.cms.gov/participation-lookup

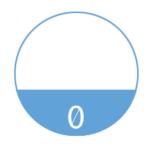


## How Does MIPS Affect You? Pick Your Pace

Participate in an Advanced APM



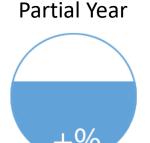
Some practices may choose to participate in an Advanced APM in 2017 **Test Pace** 



#### **Submit Something:**

- Submit some data after January 1, 2017
- Neutral payment adjustment

**MIPS** 



Full Year



#### **Submit a Partial Year:**

- Report for 90-day period after January 1, 2017
- Neutral or positive payment adjustment

#### Submit a Full Year:

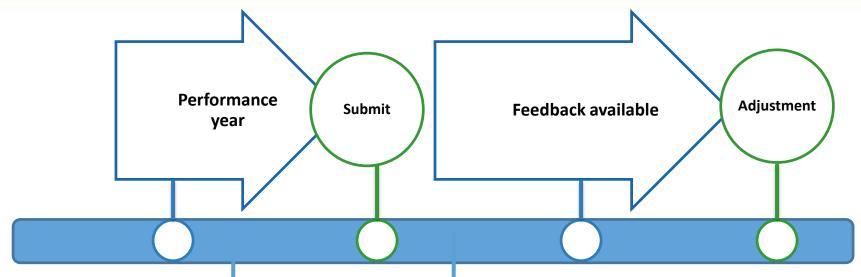
- Fully participate starting January 2017
- Positive payment adjustment

Not participating in the QPP for the Transition Year will result in a negative 4 percent payment adjustment.





## How Does MIPS Effect You? Timelines



## **2017** Performance Year

- Performance period opens January 1, 2017.
- Performance period closes December 31, 2017.
- Clinicians care for patients and record data during the year.

## March 31, 2018 Data Submission

- Deadline for submitting data is March 31, 2018.
- Clinicians are encouraged to submit data early.

#### **Feedback**

- CMS provides performance feedback after data is submitted.
- Clinicians will receive feedback before the start of the payment year.

## January 1, 2019 Payment Adjustment

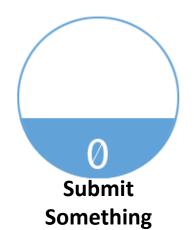
 MIPS payment adjustments are prospectively applied to each claim beginning on January 1, 2019.

October 2, 2017
Final 90 Day
Period Begins





## Your Pace: Choosing to Test for 2017





https://www.youtube.com/watch?v=IW kHiNYV8s AMA provides steps



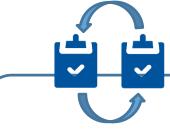
"One Patient, One Measure" submit more than one to be safe ...

OR

#### **Minimum Amount of Data**



1 Quality Measure



1 Improvement Activity



4 or 5\* Required
Advancing Care
Information
Measures

Source: The Centers for Medicare & Medicaid Services

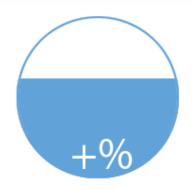
OR





<sup>\*</sup> Depending on certified electronic health record technology (CEHRT) edition

## Your Pace: Partial Participation for 2017





https://www.youtube.com/watch?v=ZRmGq0U9Wu8

HSAG provides guidance if you don't have an EHR

Submit a Partial Year

"So what?"—You must start data collection by October 2





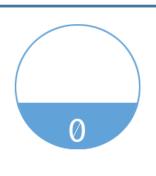
Need to send performance data by March 31, 2018





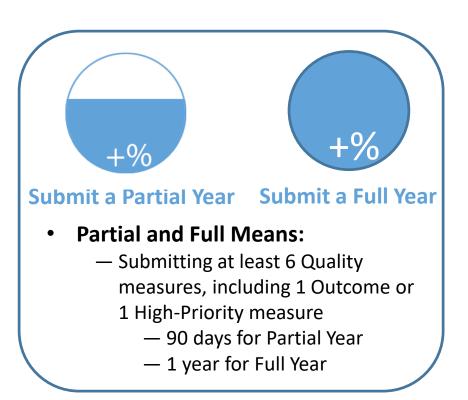


## Quality: Requirements for the Transition Year



#### **Submit Something**

- Test Means:
  - Submitting 1 Quality Measure



For a full list of measures, please visit QPP.CMS.GOV.





## Improvement Activity: Requirements for the Transition Year



**Submit Something** 

#### Test Means:

- Attesting to 1 Improvement Activity
  - Activity can be high or medium weight
  - In most cases, to attest you need to indicate that you have done the activity for 90 days.

For a full list of measures, please visit QPP.CMS.GOV.



#### Partial and Full Means:

- Attesting to 1 of the following combinations:
  - 2 high-weighted activities
  - 1 high-weighted activity and 2 medium-weighted activities
  - At least 4 medium-weighted activities



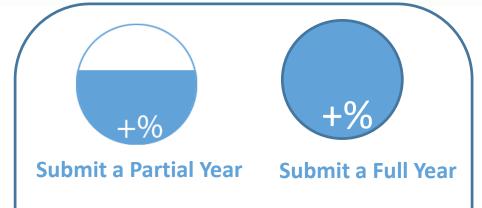


## ACI: Requirements for the Transition Year



#### **Submit Something**

- Test Means:
  - Submitting 4 or 5 base score measures
    - Depends on use of 2014 or 2015 Edition
  - Reporting all required measures in the base score to earn any credit in the Advancing Care Information performance category



- Partial and Full Means:
  - Submitting more than the base score in the Transition Year

For a full list of measures, please visit QPP.CMS.GOV.





### What to Do?

- 1. Determine your eligibility.
- 2. Prepare to participate by reviewing practice readiness, ability to report, and the *Pick Your Pace* options and measures.
- 3. Assess where you are in your career.
- 4. Assess your financial considerations.
- 5. Choose to submit data as an individual or as a part of a group. If Individual, select Pace.
- 6. Select Pace.
- 7. Choose your measures. Visit <a href="https://qpp.cms.gov">https://qpp.cms.gov</a> for measure selection and remember to review your current billing codes to help identify measures that best suit your practice.
- 8. Choose your submission method and verify its capabilities.
- 9. Verify your EHR vendor or registry's capabilities before your chosen reporting period.





### What to Do?



Use your NPI to verify <a href="https://qpp.cms.gov/participation-lookup">https://qpp.cms.gov/participation-lookup</a>



Approved Medicare	Ne		Doutiel Veer
	No		Partial Year
Charges	Participation	Test Pace	Pace
\$30,000	(\$1,200)	<b>\$0</b>	\$1,200
\$50,000	(\$2,000)	<b>\$0</b>	\$2,000
\$75,000	(\$3,000)	<b>\$0</b>	\$3,000
\$100,000	(\$4,000)	<b>\$0</b>	\$4,000

bonuses not included

Avoiding a penalty? Likely not worth the administrative process change to submit data as a group. However, if you seek a full bonus, sharing the administrative load with a group may make reporting/requirements easier.





## Choose Your Measures/Activities (cont.)

#### How do I do this?

- Go to qpp.cms.gov.
- Click on the Explore Measures at the top of the page.
- Select the performance category of interest.

Quality Measures Advancing Care Information Improvement Activities

 Review the individual Quality and Advancing Care Information measures as well as Improvement Activities.





## Sample Measures

## Quality 21 Orthopaedic Measures

- Care Plan
  - High priority measure
  - Claims, Registry
- Documentation of Current Medications in the Medical Record
  - High priority measure
  - Claims, EHR, Registry
- Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention
  - High priority measure
  - Claims, EHR, Registry
- Rheumatoid Arthritis (RA):
   Assessment and Classification of Disease Prognosis
  - High priority measure
  - Registry

## Improvement 93 measures

- Care transition standard operational improvements
  - Medium activity weighing
- Collection and use of patient experience and satisfaction data on access
  - Medium activity weighing
- Consultation of the Prescription Drug Monitoring program
  - High activity weighing
- Implementation of practices/processes for developing regular individual care plans
  - Medium activity weighing

## Advancing Care 5 Measures

- e-Prescribing
- Prevention of Information Blocking Attestation
- Provide Patient Access
- Request/Accept Summary of Care
- Security Risk Analysis

Electronic health record = EHR



## How to Report

	Individual	Group	
Quality	<ul> <li>Qualified Clinical Data Registry (QCDR)</li> <li>Qualified Registry</li> <li>EHR</li> <li>Claims</li> </ul>	<ul> <li>QCDR</li> <li>Qualified Registry</li> <li>EHR</li> <li>Administrative Claims</li> <li>CMS Web Interface</li> <li>CAHPS for MIPS Survey</li> </ul>	
Improvement Activities	<ul><li>QCDR</li><li>Qualified Registry</li><li>EHR</li><li>Attestation</li></ul>	<ul> <li>QCDR</li> <li>Qualified Registry</li> <li>EHR</li> <li>CMS Web Interface</li> <li>Attestation</li> </ul>	
Advancing Care Information	<ul><li>QCDR</li><li>Qualified Registry</li><li>EHR</li><li>Attestation</li></ul>	<ul> <li>QCDR</li> <li>Qualified Registry</li> <li>EHR</li> <li>Attestation</li> <li>CMS Web Interface</li> </ul>	

Consider measures reporting path and past participation

<sup>\*</sup>Must be reported via a CMS approved survey vendor together with another submission method for all other Quality measures.





### Call to Action

#### **Get Help! Request No-Cost Assistance**

- Register for assistance at <u>www.hsag.com/calhipso</u>
- Submit MIPS questions via email at <a href="mailto:info@CalHIPSO.org">info@CalHIPSO.org</a>
- Contact us at 888.541.5759

#### **Available Resources**

- Learning Action Network—For event topics and registration information, please visit: <a href="www.hsag.com/LFF">www.hsag.com/LFF</a>.
- CMS Quality Payment Program Website: <a href="https://qpp.cms.gov">https://qpp.cms.gov</a>
   Subscribe to the QPP ListServ.
- Medicare Learning Network Learning Management System (LMS): <a href="https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNGenInfo/index.html?redirect=/mlngeninfo/">https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNGenInfo/index.html?redirect=/mlngeninfo/</a>





## Thank you!





"We are committed to supporting your organization in meeting quality improvement goals and reporting requirements."





