

## The time to report your 2019 Medicare Quality Payment Program (QPP) performance is nearly here

From **January 1, 2020 to March 31, 2020**, you can submit your quality measures, attest to your improvement activities, and demonstrate the use of your 2015 certified electronic health record technology (CEHRT) for scoring under QPP's Merit-based Incentive Payment System (MIPS). Healthcentric Advisors, New England's Quality Improvement Organization, is available to assist you through the reporting process.

Complete the following actions to ensure you receive the highest possible MIPS score and remain eligible to receive a positive adjustment to your 2021 Medicare Part B payments.

### Before 12/31/2019

- If you do not have a 2015 CEHRT or experience limited functionality:* Apply for a small practice hardship exception from the Promoting Interoperability category. <https://qpp.cms.gov/mips/exception-applications>
- If you use a 2015 CEHRT and choose to report Promoting Interoperability:* Confirm that you meet all of the requirements:
  - You have performed or reviewed your practice's Security Risk Analysis during 2019 and have supporting documents on file. <https://www.healthit.gov/providers-professionals/security-risk-assessment-tool>
  - You have at least one instance of each of the five required measures or are able to submit an exclusion from the measure.

### Between Now and 03/31/2020

- Log into your QPP account to verify that you can access the reporting portal. (If you do not have an account, register for one through HARP.) <https://qpp.cms.gov/login>
- Check the eligibility status of your practice's clinicians and decide if you will report for each individual clinician or as a group. <https://qpp.cms.gov/participation-lookup>
- If you report via claims:* There is no need to further report Quality Measures information, but you will need to log into your QPP account to attest to Improvement Activities.
- If you report the data captured in your CEHRT:* Verify that the dashboard reflects your performance on Quality Measures, your completion of Improvement Activities, and your achievement with Promoting Interoperability requirements.
- If you download a report from your CEHRT and submit the information through the QPP Portal:* Confirm that you can download a QRDA III report from your CEHRT.
- If you have a third-party (CEHRT vendor, registry, or billing service) submit on your behalf:* Contact them to learn when your completed 2019 data will be available for you to review your score for each reporting category and when the information will be submitted to QPP.
- If you are a part of an ACO:* Confirm that you have submitted a small practice hardship exclusion for Promoting Interoperability or, if you report Promoting Interoperability, that you can submit information through your QPP Portal or have a third-party report this information directly to QPP on your behalf.

### After 01/01/2020

- Save supporting materials, both electronically and hard copy, in preparation of data validation and audit:
  - *Quality Measures*: Reports that list clinician name(s) and reporting year.
  - *Improvement Activities*: Documentation of activities and timeframe performed (at least 90 continuous days)
  - *Promoting Interoperability*: Documentation of necessary information:
    - CEHRT information:
      - Vendor name
      - Edition
      - CEHRT certification number (<https://chpl.healthit.gov/#/search>)
      - *If system upgraded during 2019*: Upgrade date
    - Security Risk Analysis: Date and name of person who completed review/analysis within each document and in the title of document
    - Measure Requirements:
      - Documentation from CEHRT that includes the following:
        1. Time period report covers (performance period)
        2. Clinician identification (e.g., National Provider Identifier)
        3. Evidence that the report was generated by the CEHRT (e.g., screenshot of the report before it was printed)
      - *If CEHRT is unable to generate reports that limit the calculation of measures to a prior time period*: Download and/or print a copy of the report used at the time of data submission.

### Before 03/31/2019

- Submit all information to QPP program through the QPP Portal or confirm that your third-party provider has submitted on your behalf.
  - Save screenshots of your submission through the QPP Portal or of the submission receipts from your third-party provider.
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