



MIPS Quality Payment Program: 2020 Promoting Interoperability

ACO Participants

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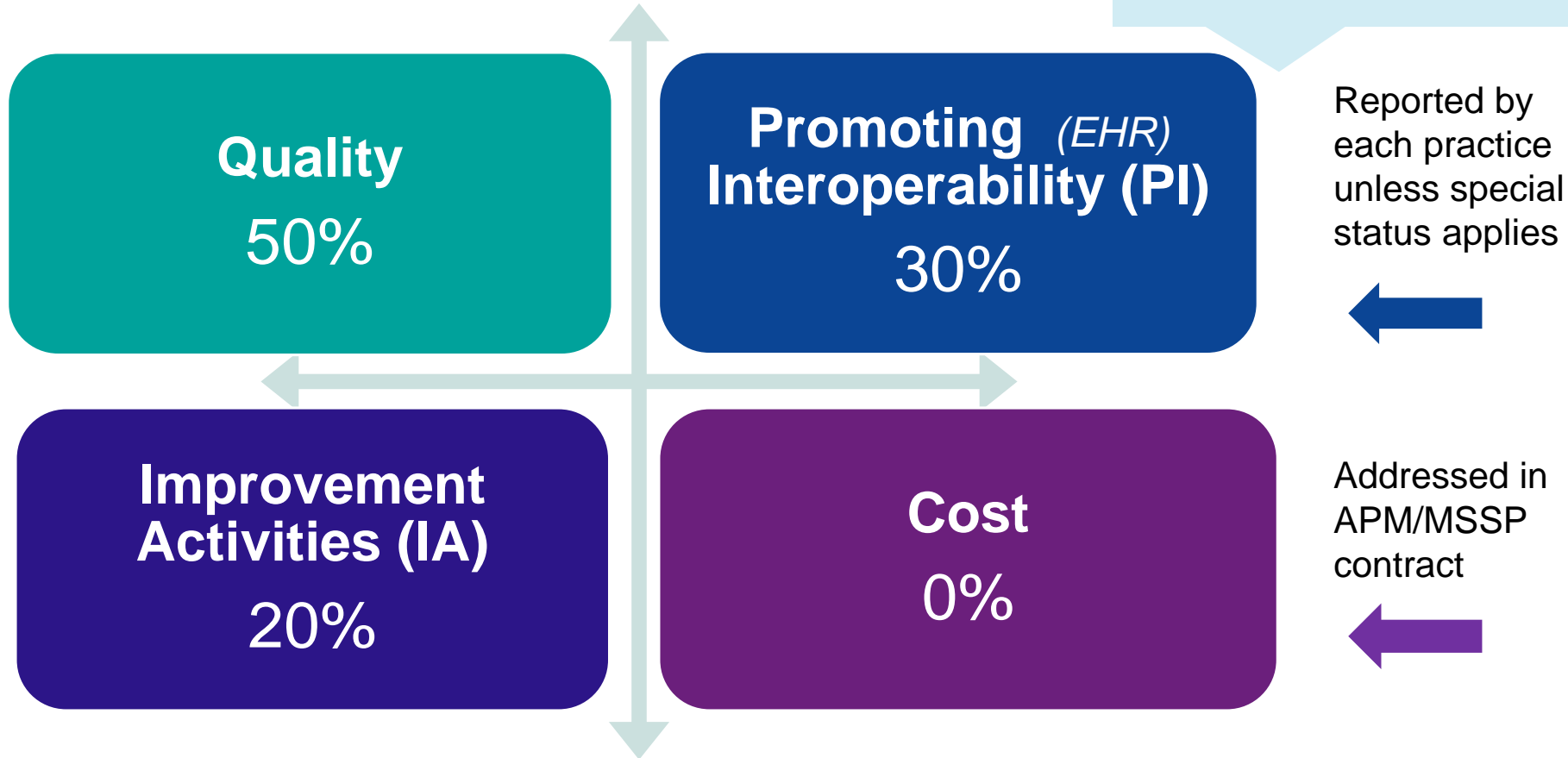
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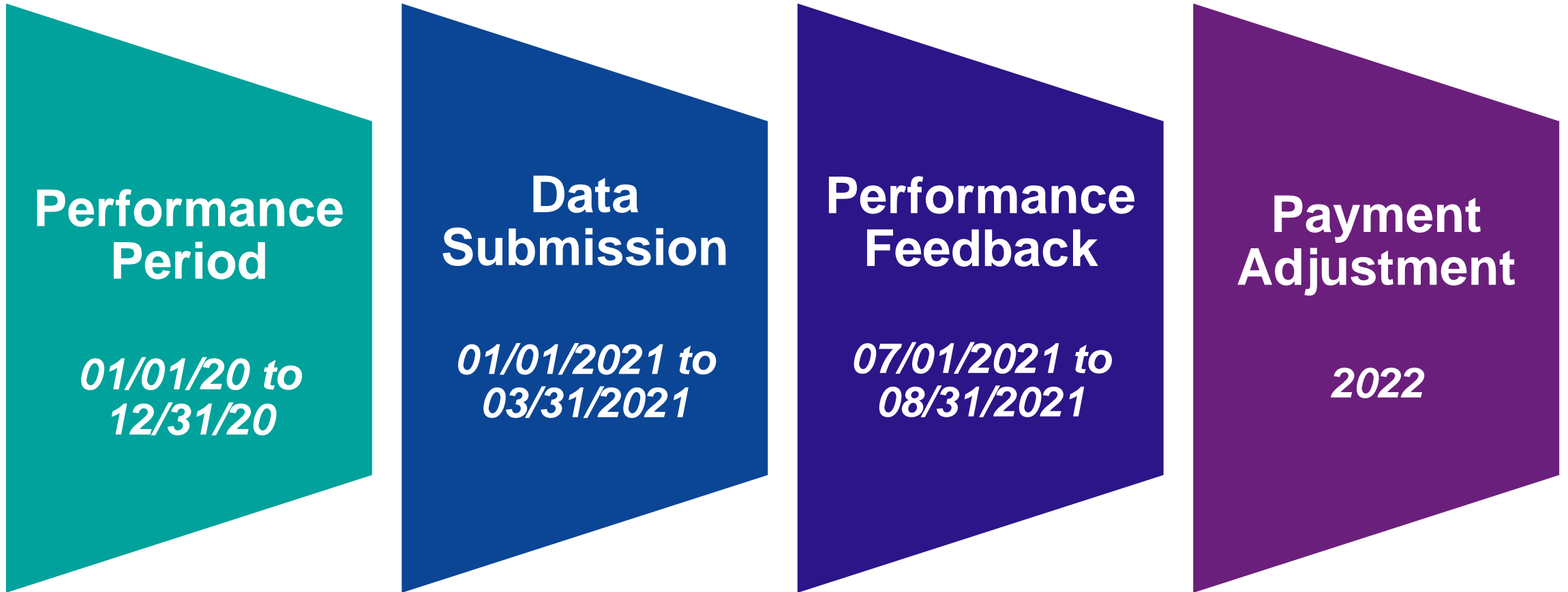


MIPS 2020 Performance Categories

ACO participants may report PI as individuals or as a group.



MIPS 2020 Performance Period Timeline



Promoting Interoperability (PI)



MIPS APM: Medicare Shared Savings Program Track 1



Each ACO member receives the ACO's overall MIPS score and resulting adjustment

The PI performance of each practice is aggregated to calculate a single PI score for the ACO.

This score is an average of the highest score attributed to each MIPS eligible clinician in the APM Entity from individual or group reporting



APM Participants: PI Provider Exemptions

Automatically Exemption	Exemption Applications	Negation of Exemption	Impact on Overall MIPS Score
<ul style="list-style-type: none">• Specific clinician types• Specific special statuses	<ul style="list-style-type: none">• Hardship• Small practice special status	<ul style="list-style-type: none">• Submission or attestation of PI will irrevocably cancel the exemption (<i>includes attestation of Security Risk Analysis measure</i>)• If provider unable to meet PI requirements, PI score of 0 will result	<ul style="list-style-type: none">• Provider excluded from PI calculation for APM score• No reweighting between reporting categories



Automatic PI Exemption: Clinician Types

Continued from 2018

- Physician assistants
- Nurse practitioners
- Clinical nurse specialists
- Certified registered nurse anesthetists

Added in 2019

- Physical therapists
- Occupational therapists
- Clinical psychologists
- Speech-language pathologists
- Audiologists
- Registered dietitians or nutrition professionals.

Automatic PI Exemption: MIPS Special Statuses

Non-patient facing
clinicians

*100 or fewer Part B
patient-facing
encounters*

Ambulatory Surgical
Center (ASC)

*75%+ services
performed in Surgery
Center*

Hospital-based

*75%+ services
performed in POS 19,
21, 22, 23*

TIPS:

- *For groups, 75% of eligible clinicians must qualify for re-weighting.*
- *If any PI data is reported, exemption is cancelled!*

Hardship Exemption Applications

Small Practice status
(15 or fewer clinicians)

Decertified EHR
technology

Insufficient Internet
connectivity

Extreme and uncontrollable
circumstances

Lack of control over the
availability of CEHRT

Applications available summer 2020 and must be submitted to CMS by
December 31st, 2020

2020 PI Requirements

2015 Certified EHR

- Generate a CMS EHR Certification ID based on the combination of software platforms that meet CMS certification requirements
- Provide this CMS ID when submitting PI

Attestations

- **Security Risk Analysis:** performed or reviewed in 2020 and when upgrading system
- **Prevention of Information Blocking:** allow patients access to their information
- **ONC Direct Review Attestation:** assent to federal government audit

Report Measures

- 5 required measures: report at least one instance or claim measure exclusion
- 90 consecutive day reporting period
- 1 bonus measure

CEHRT Certification ID

1) Go to CHPL Website (<https://chpl.healthit.gov>)

2) Generate a CMS EHR Certification ID

- Search for each EHR software platform used by your practice
- For each platform click the yellow *+Cert ID* button. This will open a pop-up text box that displays the EHR base criteria that have been met
- Continue to add platforms until the text box shows that 100% of requirements have been met

3) Click the *Get 2015 EHR Certification ID* button within the text box

4) This will open a pop-up that provides your certification ID. Click the *Download PDF* button in that box.

5) Save this PDF document in your files. When you report PI for the performance year, enter the CMS EHR ID.

Detailed guidance available at https://www.healthit.gov/sites/default/files/policy/chpl_public_user_guide.pdf, pages 23-26.

PI Measures and Points

Objective	Measure	Points
Provider to Patient Exchange	Provide Patients Electronic Access to Their Health Information	40
Health information Exchange	Support Electronic Referral Loops by Sending Health Information	20
	Support Electronic Referral Loops by Receiving & Incorporating Health Information	20
Public Health and Clinical Data Exchange	Participate in two exchanges: Immunization Registry Reporting, Electronic Case Reporting, Public Health Registry Reporting, Clinical Data Registry Reporting, Syndromic Surveillance Reporting	10
Electronic Prescribing	ePrescribing	10
	<i>Bonus: Query of Prescription Drug Monitoring Program (PDMP): yes/no response.</i>	<i>5 (bonus)</i>



PI Scoring Method

Calculation

- **Measure Scores:** Available Points X Performance Rate
- **PI Points:** Sum of Measure Scores + Bonus Points
- **PI Score:** PI Points X 30%

Emphasis on performance

- Minimum measure score is 1 if performed for at least 1 patient
- Remaining score based on proportion of eligible cases where action performance (performance rate)

PI Scoring Example

Measure	Available Pts.	Performance	Measure Score
Patient Electronic Access	40	75%	30
Send Health Information	20	50%	10
Receive/Incorporate Health Information	20	40%	8
Pub Health/Clinical Data Exchanges	10	Yes, Yes	10
E-Prescribing	10	90%	9
<i>Sum Measure Pts</i>			67
Bonus Points		Query of PDMP	+5
<i>PI Points</i>			72
PI Score (contribute to overall MIPS)		72 X 30%	21.6



Patient Electronic Access

PI_PEA_1

For at least one unique patient seen by the MIPS eligible clinician: (1) The patient (or the patient-authorized representative) is provided timely access to view online, download, and transmit his or her health information; and (2) The MIPS eligible clinician ensures the patient's health information is available for the patient (or patient-authorized representative) to access using any application of their choice that is configured to meet the technical specifications of the Application Programming Interface (API) in the MIPS eligible clinician's certified electronic health record technology (CEHRT)

40 Points Available

No exclusions

No reweighting

Send Health Information

PI_HIE_1

For at least one transition of care or referral, the MIPS eligible clinician that transitions or refers their patient to another setting of care or health care provider: (1) Creates a summary of care record using certified electronic health record technology (CEHRT); and (2) electronically exchanges the summary of care record

20 Points Available

Exclusion: Any MIPS eligible clinician who transfers a patient to another setting or refers a patient fewer than 100 times during the performance period

Reweightings: Patient Electronic Access

Receive/Incorporate Health Information

PI_HIE_4

For at least electronic summary of care record received for patient encounters during the performance period for which a MIPS eligible clinician was the receiving party of a transition of care or referral, or for patient encounters during the performance period in which the MIPS eligible clinician has never before encountered the patient, the MIPS eligible clinician conducts clinical information reconciliation for medication, medication allergy, and current problem list.

20 Points Available

Exclusions:

- Any MIPS eligible clinician who is unable to implement the measure for a MIPS performance period in 2020
- Any MIPS eligible clinician who receives fewer than 100 transitions of care or referrals or has fewer than 100 encounters with patients never before encountered during the performance period

Reweightings: Send Health Information

Public Health and Clinical Data Exchanges

PI_PHCDRR_1-5

The MIPS eligible clinician must choose to report for at least two:

- Clinical data registry
- Immunization registry
- Public health registry
- Electronic case reporting to public health agency
- Syndromic surveillance reporting

Must report for two, report for one and submit exclusion for one, or submit two exclusions for two

10 Points Available

Exclusions:

- Several based on regional jurisdictions and applicable regulations
- May request exclusion from one or two exclusions from both

Reweighting:

- If one, reweight to other
- If two, reweight to Patient Electronic Access

Electronic Prescribing

PI_EP_1

At least one permissible prescription written by the MIPS eligible clinician is queried for a drug formulary and transmitted electronically using certified electronic health record technology (CEHRT).

10 Points Available

Exclusion: Any MIPS eligible clinician who writes fewer than 100 permissible prescriptions during the performance period

Reweighting: Divided between Sending Health Information and Receiving/ Incorporating Health Information

E-Prescribing Bonus Measure

Query of Prescription Drug Monitoring Program PI_EP_2

For at least one Schedule II opioid electronically prescribed using CEHRT during the performance period, the MIPS eligible clinician uses data from CEHRT to conduct a query of a PDMP for prescription drug history, except where prohibited and in accordance with applicable law.

5 bonus point

Yes/No response

PI Measure Removed for 2020



**Verify Opioid Treatment Agreement
PI_EP_3**



PI Data Submission Methods

Submitter Types (entity submitting data to CMS)

- Individual clinician
- Practice group
- Third-party entity (*e.g. registry, EHR vendor*)

Submission Method (mechanism to submit data to CMS)

- Direct (*via Application Programming Interface, API*)
- Log in and upload (*via QPP Portal*)
- Log in and attest (*via QPP Portal*)

For More Information

Resources

Final Rule

<https://www.federalregister.gov/documents/2019/11/15/2019-24086/medicare-program-cy-2020-revisions-to-payment-policies-under-the-physician-fee-schedule-and-other>

Quality Payment Program website

<https://qpp.cms.gov/>

Contact Us

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Questions

