QPP Roundup: January 2018
Providing monthly updates on PAI’s activities and QPP news for you and your practice.

PAI’s QPP Resource Center: Tools to Help Physicians Succeed – Top 10 Changes to Understand for CY 2018 QPP Participation

To help physicians prepare for this year’s participation in the QPP, PAI developed “The Top 10 Changes to Understand for 2018 QPP Participation.” CMS’s final rule for CY 2018 maintained many of the 2017 transition year policies for 2018, but physicians should be aware of several new participation requirements that CMS adopted for 2018. Review it today to better understand the 2018 requirements.

Additional resources on the QPP, MIPS, and Advanced APMs are available on PAI’s MACRA QPP Resource Center. Please note that these were developed for the 2017 performance year. These resources may not translate completely to the 2018 performance year due to changes contained in the 2018 QPP Final Rule. Beginning on March 15, 2018, all PAI resource materials on the QPP will reflect the 2018 participation rules.

End of 2017 Checkup – CMS Submission System Now Available – Physicians Have Until March 31, 2018 to Submit 2017 MIPS Performance Data and Avoid a -4% Payment Adjustment in 2019

CMS launched its new QPP submission system to allow physicians and other clinicians to submit their 2017 MIPS performance data. Physicians have until March 31, 2018, to use the system and avoid a negative payment adjustment in 2019. You will need to know your Enterprise Identity Management (EIDM) account credentials to log in, then you will be able to report data as an individual or group practice and receive “real-time initial scoring,” according to CMS.

Use of the CMS submission system is optional. Clinicians may still report their data using
other options including qualified clinical data registries (QCDRs), qualified registries, attestation, via electronic health records (EHR) system vendors, or the CMS Web Interface.

To learn more about the CMS QPP submission system, please review the CMS fact sheet.

To learn how to create an EIDM account, review this CMS user guide.

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**CMS QPP Updates**

CMS has reorganized its QPP Resource Library and has now created the following separate pages for its materials:

- 2017 Resources by provider type or topic
- 2018 Resources by provider type or topic
- Resources for all years by provider type
- Resources for all years by topic

For additional resources, please visit PAI's MACRA QPP Center.

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**QPP in the News**

**Large Health Systems Say They Need MACRA Relief Just as Much as Small Providers**

This article discusses how CMS’s focus on making the program accessible for small practices is leaving larger systems behind. Some large systems are advocating for CMS to stop assessing performance through the tax identification numbers (TINs). Instead, they believe that performance should be based on specialty and care integration, as many TINs encompass multi-disciplinary practices and may not share the same patient population. Other large systems have expressed concern over the increased low-volume thresholds for 2018 MIPS participation, believing that the additional flexibility “may slow the transition from volume-to-value.” Instead, they believe that clinicians below the low-volume threshold should have the option to opt-in to program participation.

**OIG Report – Follow-up Review: CMS’s Management of the Quality Payment Program**

In 2016, the Office of Inspector General (OIG) conducted an early implementation review of CMS’s management of the QPP. After completing its review, OIG found that CMS had made substantial progress towards implementation, but also recommended that it take the following actions to boost the program’s success: 1) Develop IT systems to support critical QPP functions; and 2) Ensure clinicians’ readiness to participate in the QPP.

In its follow-up review published in December 2017, OIG found that in terms of the first recommendation, CMS appears to be on track to deploy the necessary IT systems for MIPS submission data in January 2018. With respect to the second, CMS has executed a thorough outreach campaign directed toward clinicians focusing on general awareness. CMS staff indicated that clinicians in rural or small practices will need more customized assistance. OIG concluded the report saying that CMS needs to develop and enact a large-scale QPP program integrity plan.