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

PAI’s QPP Tip of the Month – Physicians Have Until March 31, 2018 to Submit 2017 MIPS Performance Data and Avoid a -4% Payment Adjustment in 2019

Physicians have until March 31 to submit their 2017 MIPS performance data to avoid a negative payment adjustment in 2019. These data can be submitted through the CMS QPP submission portal. With the 2017 Merit-based Incentive Payment System (MIPS) reporting deadline fast approaching, you may be unsure of or need additional information on what steps you need to take to submit your 2017 MIPS participation data. PAI has gathered the most helpful CMS resources that provide you with step-by-step instructions on submitting your 2017 MIPS data:

- CMS MIPS Reporting Deadlines Fast Approaching: 10 Things to Do and Know – this CMS overview provides information on the top 10 things you need to do and know to submit using the CMS QPP submission portal and provides links to other helpful resources.
- CMS Tutorial for Individual and/or Group Data Submission – a video tutorial that provides a step-by-step demonstration of how to use CMS QPP Submission Portal and how to submit your data for each of the MIPS categories.
- CMS Submitting 2017 Transition Year Data to the QPP – this CMS fact sheet provides an overview of the submission requirements and outlines the different options for submitting MIPS data using other reporting mechanisms.
- Enterprise Identity Management (EIDM) Account User Guide – EIDM user accounts and credentials are required to log into the CMS QPP Submission Portal. This user guide provides step-by-step instructions on how to create an EIDM account for QPP submission purposes.
- 2017 Transition Year Flexibility Quality Category Options – this PAI resource provides you with information on the minimum you need to report for the quality category for the 2017 test participation option.
- 2017 Transition Year Flexibility Improvement Activities Category Options – this PAI resource provides you with the information on the minimum you need to report for
the improvement activities category for the 2017 test participation.

Additional resources on the QPP, MIPS, and Advanced APMs are also available on PAI’s [MACRA QPP Resource Center](#). Please note that resources for the 2017 performance year are still available to help you with your 2017 MIPS submission; updated materials for 2018 MIPS participation will be made available by PAI on March 15, 2018.

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### PAI Submits Letter to House Energy & Commerce Committee Expressing Concerns Over Health Care Consolidation

On February 16, PAI submitted a letter to the House of Representatives’ Energy & Commerce Committee’s Subcommittee on Oversight and Investigations in conjunction with its hearing to examine the ramifications of rapid, system-wide consolidation in the health care marketplace. The consolidation trend includes widespread mergers and acquisitions and other business partnerships between would-be competitors and has also spurred a frenzy of so-called “vertical” alliances to capture more patients and control more health care dollars. In its letter, PAI:

- Expressed support for Congressional scrutiny into the potential concerns about a health care system dominated by large, powerful entities with enormous market power;
- Shared findings from an ongoing research collaboration with Avalere Health, which examines the extent and impact of hospital acquisitions of physician practices; and
- Urged review of federal policies which have fueled this trend towards hospital-driven consolidation, as well as relief from outdated policies that restrict physicians from competing on a level playing field with hospitals and other corporate entities that are moving quickly to dominate various aspects of the health care delivery system.

PAI’s letter is available [here](#).

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### Secretary Azar Speaks Out on MIPS Reporting

At the February 15 Senate Finance Committee hearing, HHS Secretary Azar stated that he is interested in reducing or possibly eliminating the reporting requirements for MIPS. Instead, as included in the President’s 2019 budget, MIPS performance assessment would be based on claims data and patient surveys that would grade physicians. The complete article is available [here](#).

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### CMS QPP Updates

**CMS Seeking Participants for 2018 Burdens Associated with Reporting Quality Measures Study**

CMS is studying the burdens associated with quality measure reporting and is specifically looking to:

- “Study clinical workflows and data collection methods using different submission systems.
- Understand the challenges you have when you collect and report quality data.
- Recommend changes to try to lower your burden, improve quality data collection and reporting, and enhance clinical care.”
Individual MIPS eligible clinicians (ECs) and groups can earn full credit for the MIPS improvement activity category for 2018 by participating in the study. Additional information on the study and how to apply is available in the CMS notice.

CMS has published the 2018 measure specifications for the quality, cost, and advancing care information (ACI) categories, which are available in the CMS QPP Resource Library. For additional resources, please visit PAI’s MACRA QPP Center.

QPP in the News

Congress Should Replace Medicare’s Merit-Based Incentive Payment System
In this Health Affairs blog co-authored by Matthew Fiedler, Tim Gronniger, Paul B. Ginsburg, Kavita Patel, Loren Adler, and Margaret Darling, the authors argue that MIPS and similar programs are unlikely to be successful or meaningfully improve patient care. Instead, they believe that Congress should eliminate MIPS and should: 1) expand and improve incentives for Advanced APM participation, e.g., making the Advanced APM bonus permanent and increasing the incentive itself; and 2) create targeted incentives for certain clearly-defined, high-value activities, e.g., use of a certified electronic health record (EHR) and reporting to a clinical data registry.

Will MACRA Improve Physician Reimbursement?
In this perspective piece in the New England Journal of Medicine, Gail R. Wilensky, Ph.D., a senior fellow at Project HOPE, expresses her agreement with MedPAC about the problems with the QPP MIPS track. However, Dr. Wilensky also expresses concerns with MedPAC’s proposal for the Voluntary Value Program, citing among other concerns a lack of support from medical associations. She proposes several suggestions including allowing the CMS Innovation Center to test the feasibility of the new program through a pilot program.

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