QPP Roundup: August 2018

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

PAI's QPP Tip of the Month: Review Proposed Changes for QPP Year 3

Last month, CMS released the Physician Fee Schedule (PFS) Proposed Rule and with revisions to Year 3 of the Quality Payment Program (QPP summarized below):

- **Definition of Eligible Clinicians (ECs)** – CMS proposes expanding the definition to include physical therapists, occupational therapists, clinical social workers, and clinical psychologists.

- **Modification of the low-volume threshold** – CMS proposes adding a third criterion based on the number of covered professional services provided under the PFS. CMS proposes that ECs and groups may be excluded if they meet one of the following three criterion:
  - Have < $90,000 in Part B allowed charges; OR
  - Provide care to < 200 beneficiaries; OR
Provide ≤ 200 covered professional services under the PFS.

Additionally, CMS proposes allowing ECs to opt-in to MIPS participation if they meet or exceed one or two of the above criterion.

- **MIPS Category Weights** – CMS proposes decreasing the weight of the Quality category from 50 percent in Year 2 to 45 percent in Year 3, increasing the weight of the Cost category from 10 percent in Year 2 to 15 percent in Year 3, keeping the weight of the Improvement Activities category at 15 percent in Year 3, and maintaining the weight of the Promoting Interoperability (formerly Advancing Care Information) category at 25 percent in Year 3.

- **MIPS Performance Threshold and Payment Adjustment** – CMS proposes increasing the performance threshold from 15 points to 30 points and increasing the exceptional performance bonus threshold from 70 points to 80 points. As required by the MACRA statute, CMS proposes increasing the 2021 payment year positive and negative payment adjustment to +/- 7 percent (based on CY 2019 performance year participation).

- **Small Practice Bonus** – CMS proposes continuing the small practice bonus, but adding 3 points to the quality performance category instead of the MIPS final score.

- **Advanced APM Policies** – CMS proposes increasing the Certified EHR Technology (CEHRT) criterion from requiring that at least 50 percent of ECs in each APM Entity use a CEHRT to at least 75 percent of ECs. The proposal would also amend the Advanced APM quality criteria so that at least one quality measure in the Advanced APM must be on the MIPS final list, be endorsed by a consensus-based entity, or otherwise be determined to be evidence-based, reliable, and valid by CMS to be considered MIPS-comparable. CMS proposes similar criteria for at least one outcome measure in the Advanced APM.

A CMS fact sheet on the QPP Year 3 changes is available [here](#).

As always, PAI will provide comments in response to these and additional proposals in the PFS for the QPP and encourages you to contact your state medical society with any concerns and comments that should be included in PAI’s response. PAI’s past comments in response to QPP proposals are available [here](#).
Only 6 Percent of Physicians Have "In-Depth" Knowledge of MACRA

As cited in this piece, a recent Deloitte physician survey found that while 41 percent of physicians surveyed expressed familiarity with MACRA, only 6 percent say they “have in-depth knowledge of the law.” The survey also found that only about 30 percent of employed physicians and 51 percent of independent physicians are familiar with the law. These findings underscore PAI’s advocacy that the QPP is much too complex. PAI will argue for stability and predictability over annual disruption in its comments for QPP Year 3 changes. It believes that would allow for greater familiarity and comfort with the program.

Reminder: Promoting Interoperability Hardship Exception Application Window Opened August 1!

As part of the Promoting Interoperability category, MIPS ECs and groups may submit a Hardship Exception Application, citing any of the reasons specified below for review and approval:

- MIPS ECs in small practices (defined as 15 or fewer ECs);
- MIPS ECs using decertified EHR technology;
- Extreme and uncontrollable circumstances;
- Insufficient connectivity to internet;
- Lack of control over CEHRT availability.

If you seek a hardship exception for the 2018 MIPS participation to the Promoting Interoperability category, you have until December 31, 2018 to apply. Learn more about the Hardship Exception with this CMS resource here and PAI’s overview on the Promoting Interoperability Category Hardship and Reweighting resource. For more information on the Promoting Interoperability performance category, please review PAI’s Promoting Interoperability Overview resource.

Reminder: Requests for Targeted Review of 2019 MIPS Payment Adjustment Calculation for MIPS Eligible Clinicians or Groups
While requests for CMS reviews of 2019 MIPS Payment Adjustment Calculation for MIPS ECs or groups can be submitted until October 1, 2018, CMS strongly encourages ECs to submit a request as soon as possible to help ensure payment adjustments are applied correctly from the start of the payment year (January 1, 2019). For more information about requesting a review, CMS has published the Targeted Review of the 2019 Merit-based Incentive Payment System Payment Adjustment Fact Sheet, as well as the Targeted Review of 2019 MIPS Payment Adjustment User Guide.

**CMS QPP Updates**

CMS posted several new fact sheets to its QPP Resource Library:

- [2019 Virtual Groups Toolkit](#) – helps ECs and groups understand the virtual group election and submission process. The toolkit includes the following: 2019 Virtual Groups Overview Fact Sheet; 2019 Virtual Groups Election Process; Virtual Group Election Submission E-mail; and Virtual Group Template.
- [Enterprise Identity Data Management (EIDM) User Guide](#) – updated guide which now includes information for accessing MIPS performance feedback and submitting targeted reviews for the 2017 performance year.
- [Enterprise Identity Data Management (EIDM) ACO User Guide](#) – guide which describes EIDM roles for the CO’s Web Interface Submitter and the ACO Security Official only.
- [2018 MIPS Participation & Overview fact sheet](#) – provides information on eligibility and different participation statuses and options.
- [2018 MIPS Bonus Overview fact sheet](#) – additional information on the bonuses available for 2018 participation.
- [2018 Exceptions FAQs](#) – answers to common questions on exceptions to MIPS participation generally and those exceptions available for each of the categories.
- [2018 Other MIPS APM Quality Performance Category](#) – details the reporting requirements and performance measurement for the Quality category.

CMS also posted the slides, transcript and recording of last month’s Overview of Proposed Rule for Year 3 (2019) of the Quality Payment Program.

Additional resources on MIPS and Advanced APMs are available on [PAI’s QPP Resource Center](#) and the [CMS QPP Resource Library](#).
CMS Upcoming Webinars

- QPP Virtual Groups Webinar – Monday, August 27, 2:00 pm ET. Registration [here](#).

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