QPP Roundup: September 2019

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

QPP Tip of the Month: Consider Virtual Group Participation in 2020

The election window to sign up as part of a Virtual Group for performance year (PY) 2020 begins October 1st. If you are part of a small-group practice of 10 or fewer eligible clinicians (EC), or work as an individual practice, you may qualify to participate as part of a Virtual Group under MIPS in PY 2020. Virtual Groups allow smaller practices to band together regardless of geographic location, opening an opportunity for such practices to be scored under a larger patient pool (which can improve their ability to reliably measure against a benchmark) and to share resources with one another. Ideally, practices join a Virtual Group to gain access to resources or patient cases previously inaccessible, increasing their ability to “optimize participation” under MIPS and achieve a better overall performance score. Notably, prior to joining a Virtual Group it is important to consider the strengths and
Notably, prior to joining a Virtual Group it is important to consider the strengths and weaknesses of partnering practices. Virtual Groups under MIPS are scored as one participating entity—this means that all participating practices under a Virtual Group will receive the same MIPS performance score for PY 2020 (and, consequently, will all receive the same payment adjustment in 2022).

If you choose to enter PY 2020 as part of a Virtual Group with other participating practices, you will need to perform the following actions during the 2019 election window (October 1<sup>st</sup> through December 31<sup>st</sup>, 2019):

<table>
<thead>
<tr>
<th>Step 1</th>
<th>Identify your Virtual Group’s official representative for PY 2020</th>
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<td>Step 2</td>
<td>Establish formal written agreements with each participant</td>
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<td>Step 3</td>
<td>Send in an electronic virtual group election to CMS</td>
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For further information about Virtual Group participation, see the Virtual Groups Overview resource available on PAI’s QPP Resource Center, as well as CMS’s 2020 Virtual Groups Toolkit.

**Reminder: October 3rd is the Last Day to Start a 90-Day Performance Period for Promoting Interoperability and Improvement Activities**

October 3<sup>rd</sup> marks the final day this year where ECs under MIPS can start a 90-day performance period assessment for Promoting Interoperability (PI) and Improvement Activities (IA) performance categories. Notably, if you do not complete a 90-day performance period within calendar year (CY) 2019, you will receive zero points for both PI and IA performance measures towards your overall MIPS final score (in which case your MIPS final score will be based on your performance in the quality and cost categories). For more information on PI and IA performance categories, please view PAI’s MIPS Pathway resource page.

**PAI Comments on Request for Information on Burden**
Reduction

On August 12th, PAI submitted comments in response to CMS’s Request for Information (RFI) on Reducing Administrative Burden to Put Patients Over Paperwork. In its comments, PAI supported CMS’s efforts to reduce administrative burden and adopt policies that help optimize time spent in physician-patient encounters. Specifically, PAI made the following recommendations to CMS regarding the implementation of future policies:

- Documentation requirements should be streamlined, documentation information collected in electronic health records (EHRs) should be leveraged for other purposes, and this should be done in a way that is consistent with industry standards;
- Policies under the QPP need to be modified to better take into consideration the needs and resources of rural physicians;
- Greater alignment of Medicare and Medicaid payment and coverage requirements is necessary to reduce burden and unintended consequences; and
- Recovery Audit Contractor (RAC) policies should be adjusted for more fair and transparent audits.

CMS QPP Updates

CMS has added the following resources to their QPP Resource Library:

- **2020 Virtual Groups Toolkit** – providing details on the Virtual Groups election process for CY 2020 participation
- **2019 Claims Data Submission Factsheet** – providing details on how solo practitioners and small practices can submit their quality measures data via claims
- **2019 Eligible Measures Applicability (EMA) Resources** – providing details on how CMS determines which measures may be applicable to a physician or practice
- **2019 30-Day All-Cause Hospital Readmission Measure** – providing details on the measure specifications for this cost category measure
- **2018 Performance Feedback FAQs** – providing information on 2018 performance and related 2020 payment adjustments

CMS has also added the following two webinars to their QPP Webinar Library:

- **2020 MIPS Self Nomination Application Virtual Office Hours**
  - Slides and Transcript
- **2020 Quality Payment Program Proposed Rule Overview**