

The Physician Quality Reporting System Maintenance of Certification Program Incentive Requirements of Self-Nomination for 2012

Background

In accordance with section 1848(m) (7) of the Act ("Additional Incentive Payment"), CMS is continuing the Maintenance of Certification Program Incentive that began in January 2011. Eligible professionals who were incentive eligible for the Physician Quality Reporting System, or "Physician Quality Reporting", (formerly known as the Physician Quality Reporting Initiative, or PQRI) could receive an additional 0.5% incentive payment when Maintenance of Certification Program Incentive requirements were also been met.

Requirements

In order to qualify for the additional 0.5% incentive payment for the 2012 Physician Quality Reporting System based on the 12-month reporting period (January 1 through Dec 31); the eligible professional must:

- Satisfactorily submit data, without regard to method, on quality measures under Physician Quality Reporting, for a 12-month reporting period either as an individual physician or as a member of a selected group practice and have such data submitted:
 - o On their behalf through a Maintenance of Certification Program that meets the criteria for a registry under the Physician Quality Reporting System; or
 - o In an alternative form and manner determined appropriate by the Secretary; and
 - o More frequently than is required to qualify for or maintain board certification status:
 - o Participate in such a maintenance of Certification Program for a year; and
 - Successfully complete a qualified Maintenance of Certification Program practice assessment for such year. If the board does not have assessment modules in place, the eligible professionals will not be eligible for the 0.5 percent incentive.
 - Practice assessment must include a survey of patient experience with care as part of the practice assessment. This data must be available to CMS for validation purposes, upon request

AND

- The Maintenance of Certification Program will need to submit to CMS, on behalf of the eligible professional the following information:
 - o In a form and manner specified by the Secretary, that the eligible professional more frequently than is required to qualify for or maintain board certification status, participates in the Maintenance of Certification Program for a year and successfully completes a qualified Maintenance of Certification Program practice assessment for such year

- o Upon request by the Secretary, information on the survey of patient experience with care; and
- o As the Secretary may require, on the methods, measures, and data used under the Maintenance of Certification Program and the qualified Maintenance of Certification Program practice assessment.

As defined in section 1848(m) (7) (C) (i) of the Act, a “Maintenance of Certification Program” is a continuous assessment program that advances quality and the lifelong learning and self-assessment of board certified specialty physicians by focusing on the competencies of patient care, medical knowledge, practice-based learning, interpersonal and communication skills and professionalism. In order to qualify for the additional 0.5 percent incentive payment in 2012 eligible professionals will be required to participate more frequently than is required in at least one of the following three parts of the Maintenance of Certification Program, as well as “more frequent” successful completion of a qualified maintenance of certification program practice assessment.

- o Maintain a valid, unrestricted medical license in the United States.
 - Physicians simply need to maintain a valid unrestricted license in the United States to meet the requirement for “more frequent” participation.
- o Participate in educational and self-assessment programs that require an assessment of what was learned;
- o Demonstrate through a formalized, secure examination, that the physician has the fundamental diagnostic skills, medical knowledge and clinical judgment to provide quality care in their respective specialty

A “qualified Maintenance of Certification program practice assessment,” as defined in section 1848(m)(7) (C) (ii) of the Act is one that includes an initial assessment of an eligible professional's practice that is designed to demonstrate the physician's use of evidence-based medicine; includes a survey of patient experience with care; and requires the physician to implement a quality improvement intervention to address a practice weakness identified in the initial assessment. The practice assessment must also require the practice to reassess performance improvement after the intervention.

The phrase “more frequently” may be interpreted differently by different Maintenance of Certification Programs. CMS is looking to see an attestation from a Maintenance of Certification Program entity that both the Maintenance of Certification Program itself and the practice assessment are completed once more by a physician than is required by a specific Maintenance of Certification Program.

Self-Nomination

New and previously approved Maintenance of Certification Program entities wishing to enable their members to be eligible for the additional incentive will need to complete the self-nomination process by **January 31, 2012**. Maintenance of Certification Program entities will need to be approved for participation by CMS. Qualified Maintenance of Certification Program entities will then be able to submit on the physicians' behalf. For consideration, Maintenance of Certification Program entities will need to submit the following by a mailed letter to CMS:

- Detailed information regarding the Maintenance of Certification Program with reference to the statutory requirements
- Indicate the organization sponsoring the Maintenance of Certification Program, and whether the Maintenance of Certification Program is sponsored by an American Board of Medical Specialties (ABMS). If not an ABMS board, indicate whether the program is substantially equivalent to the ABMS Maintenance of Certification Program process
- Confirmation that the program is existence as of January 1, 2012
- Indicate that the program has at least one (1) active participant
- The frequency of a cycle of Maintenance of Certification for the specific Maintenance of Certification Program of the sponsoring organization; including what constitutes "more frequently" for both the Maintenance of Certification Program itself and the practice assessment for the specific Maintenance of Certification Program of the sponsoring organization
- Confirmation that the practice assessment will occur and be completed in the year the physician is participating in the Maintenance of Certification Program Incentive
- What was, is, or will be the first year of availability of the Maintenance of Certification Program practice assessment for completion by an eligible professional
- What data is collected under the patient experience of care survey and how this information would be provided to CMS
- How the Maintenance of Certification program monitors that an eligible professional has implemented a quality improvement process for their practice
- Describe the methods, and data used under the Maintenance of Certification Program, and provide a list of all measures used in the Maintenance of Certification Program for 2011 and to be used for 2012, including the title and descriptions of each measure, the owner of the measure, whether the measure is NQF endorsed, and a link to a website containing the detailed specifications of the measures, or an electronic file containing the detailed specifications of the measures
- For previously approved Maintenance of Certification Programs - also note any updates to the program

New Maintenance of Certification Program entities will be interviewed as part of the vetting process. Existing Maintenance of Certification Program entities will not be required to participate in a second interview.

Sponsoring organizations who desire to participate as a Maintenance of Certification Program must provide CMS the following information in a CMS-specified file format, via a secure method by March 31, 2013.

- The eligible professional's name, who would like to participate in the Maintenance of Certification Program Incentive for 2012
- The individual National Provider Identifier (NPI); not group (NPI)
- The applicable Tax Identification Number(s) or Social Security Number used to bill and receive Medicare reimbursement
- Attestation from the board that the information provided to CMS is accurate and complete
- Maintenance of Certification Program entity has signed documentation from eligible professional(s) that he/she wishes to have the information released to CMS
- Information from the patient experience of care (patient satisfaction) survey
- Information certifying the eligible professional has participated in a Maintenance of Certification Program for a year, "more frequently" than is required to qualify for or maintain board certification status, including the year the physician met the board certification requirements for the Maintenance of Certification Program, and the year the eligible professional participated in the Maintenance of Certification Program "more frequently" than is required to maintain or qualify for board certification
- Information certifying the eligible professional has completed the Maintenance of Certification Program practice assessment at least one time each year the eligible professional participates in the Maintenance of Certification Program Incentive

We anticipate completing the qualification process by mid-2012 and will post the final list of Qualified Maintenance of Certification Program entities on the Physician Quality Reporting System section of the CMS website (www.cms.gov) at that time.

Physician(s) desiring to be considered for the 2012 Maintenance of Certification Program Incentive should review the documents referenced above for the qualified Maintenance of Certification Program entities. The Maintenance of Certification Program Incentive is applicable for physicians participating in the Physician Quality Reporting System via individual and group practice reporting (Group Practice Reporting Option). Eligible provider(s) will need to work with their selected Maintenance of Certification Program entity to ensure successful completion of the Maintenance of Certification Program Incentive participation requirements. The Maintenance of Certification Program incentive payment will be paid at the same time as the Physician Quality Reporting incentive payment for 2012 for those physician(s) that qualify. It will be a separately identifiable payment on the Physician Quality Reporting feedback report for 2012. The 2012 Physician Quality Reporting will calculate the Maintenance of Certification Program incentive payment of 0.5% based on allowed Medicare Part B PFS charges for covered professional services furnished between January 1, 2012 and December 31, 2012. Physician(s) cannot receive more than one additional 0.5% incentive even if they complete a Maintenance of Certification Program in more than one specialty. The Maintenance of Certification Program incentive will not be awarded to physician(s) who have not qualified for the Physician Quality Reporting incentive.

The system shall determine incentive payments for group practices participating in the GPRO who had group practice members who were found incentive eligible for the Maintenance of Certification Program incentive payment. If the group practice satisfactorily reported Physician Quality Reporting, the group practice shall receive an additional 0.5% incentive payment based on the allowed charges attributed to the group practice members who were found eligible for the Maintenance of Certification Program Incentive payment.

Please refer to www.cms.gov for more information regarding the Maintenance of Certification Program.

Maintenance of Certification Program self-nomination letters are required for each year the Maintenance of Certification Program intends to participate in the Physician Quality Reporting System Maintenance of Certification Program. Self nominations should be sent via a mailed letter to:

**2012 Physician Quality Reporting System Maintenance of Certification Program Incentive
Self-Nomination**

**Centers for Medicare & Medicaid Services
Office of Clinical Standards and Quality
Quality Measurement & Health Assessment Group
7500 Security Boulevard
Mail Stop S3-02-01
Baltimore, MD 21244-1850**

The letter must be received **no later than 5 p.m. E.T. on January 31, 2012.**

Please allow two weeks for mail processing.

Specialty boards that also desire to send Physician Quality Reporting System information to CMS on behalf of eligible professionals must meet the requirements for registry data submission and should follow the directions for self-nomination to become a qualified registry. Please refer to the **Registry Requirements for Submission of 2012 Physician Quality Reporting System Data on Behalf of Eligible Professional** for qualification requirements. Boards may also participate as registries for Physician Quality Reporting System data provided that they meet the registry requirements. As an alternative to requiring boards to either operate a qualified Physician Quality Reporting System registry or to self-nominate to submit Maintenance of Certification Program data to CMS on behalf of their members, CMS will continue to allow the various boards to submit the Maintenance of Certification Program data to the ABMS and have the ABMS submit the information on behalf of the various boards and their member eligible professionals to CMS.

ABC Board
123 Board Avenue
Sample, MD 12345
Tel: 123-456-7890
Email: abcboard@abcboard.org

January 15, 2012ⁱ

2012 Physician Quality Reporting Maintenance of Certification Nominationⁱⁱ
Centers for Medicare & Medicaid Services
Office of Clinical Standards and Quality
Quality Measurement and Health Assessment Group
7500 Security Boulevard
Mail Stop S3-02-01
Baltimore, MD 21244-1850

Dear PQRS Nomination Committee,

Please accept this submission as the Self Nomination of ABCⁱⁱⁱ Maintenance of Certification for possible inclusion in the 2012 Physician Quality Reporting System (PQRS) Maintenance of Certification Program Incentive. The ABC Board meets all of the requirements listed in the Maintenance of Certification Requirements document on the CMS PQRS website.

ABC Board is sponsored by the American Board of Medical Specialties^{iv}. Our Board has been in existence since 2011^v.

An additional resource containing the utilized methods and date, as well as the all measures has been included with this submission (NOT PROVIDED WITH THIS SAMPLE)^{vi}.

Please address any questions to our project manager Jon Doe (123-456-7891 / jdoe@abcboard.org), our clinical representative Susie Nurse (123-456-7892 / snurse@abcboard.org), and our technical representative Dan Jones (123-456-7893 / djones@abcboard.org).^{vii}

Thanks

Joe Smith

Joe Smith
CEO
ABC Board

Additional information to be included in the Self Nomination Letter:

- The frequency of a cycle of Maintenance of Certification including what constitutes "more frequently" for both the Maintenance of Certification Program itself and the practice assessment for the specific Maintenance of Certification Program of the sponsoring organization.
- What data is collected under the patient experience of care survey and how this information would be provided to CMS.
- How the Maintenance of Certification program monitors that an eligible professional has implemented a quality improvement process for their practice
- For previously approved Maintenance of Certification Programs - also note any updates to the program

PLEASE NOTE - This is a sample self nomination letter.
As with all documents of this nature, legal counsel review before use would be prudent.

ⁱ Letter must be received no later than **5 p.m. ET on January 31, 2012.**

ⁱⁱ This Sample Self Nomination Letter is for a Maintenance of Certification Program Incentive vendor. A Self Nomination Letter needs to be received for each of the vendor entities you would like to nominate for (e.g. Registry, EHR Direct, EHR Data Submission Vendors, and Maintenance of Certification & GPRO).

ⁱⁱⁱ Specify your Sponsoring Organization name and Maintenance of Certification Program Incentive name if the two are different.

^{iv} Specify if the Maintenance of Certification Program is sponsored by the American Board of Medical Specialties (ABMS). If not an ABMS board, indicate whether the program is substantially equivalent to the ABMS Maintenance of Certification Program process.

^v Specify what was, is, or will be the first year of availability of the Maintenance of Certification Program practice assessment for completion by an eligible professional.

^{vi} In this letter or an additional resource, describe the methods, and data used under the Maintenance Of Certification Program, and provide a list of all measures used in the Maintenance Of Certification Program for 2011 and to be used for 2012, including the title and descriptions of each measure, the owner of the measure, whether the measure is NQF endorsed, and a link to a website containing the detailed specifications of the measures, or an electronic file containing the detailed specifications of the measures.

^{vii} Specify the appropriate individuals to contact when beginning the vetting processes. Provide a phone and an email address for a program, clinical, and technical representative. A minimum of two representatives need to be provided.