



## **THE PHYSICIAN QUALITY REPORTING SYSTEM (PQRS) MAINTENANCE OF CERTIFICATION PROGRAM INCENTIVE REQUIREMENTS FOR 2014**

### **BACKGROUND**

In accordance with section 1848(m) (7) of the Act (“Additional Incentive Payment”), Centers for Medicare and Medicaid Services (CMS) is continuing the Maintenance of Certification Program Incentive that began in January 2011. Eligible professionals (EP) who were incentive eligible for the Physician Quality Reporting System (PQRS) could receive an additional 0.5% incentive payment when Maintenance of Certification Program incentive requirements were also met.

### **Requirements**

In order to qualify for the additional 0.5% incentive payment for the 2014 PQRS based on the 12-month reporting period (January 1, 2014 through December 31, 2014), the physician will need to complete the following:

- Satisfactorily submit data, without regard to method, on quality measures under PQRS, for a 12-month reporting period either as an individual physician or as a member of a group practice.

### **AND**

The Maintenance of Certification Program will need to submit to CMS, on behalf of the physician the following information:

- That the physician 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;
- Information on the survey of patient experience with care; and
- 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% incentive payment in 2014, physicians will be required to participate more frequently than is required in at least one of the following two parts of the Maintenance of Certification Program, as well as “more frequent” successful completion of a qualified maintenance of certification program practice assessment as follows:

- Participate in educational and self-assessment programs that require an assessment of what was learned; and
- 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 a physician’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**

All 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 via email sent to the following email address **no later than 5:00 p.m. E.T. January 31, 2014**: [PQRS\\_Vetting@mathematica-mpr.com](mailto:PQRS_Vetting@mathematica-mpr.com).

New Maintenance of Certification Program entities will need to be approved for participation by CMS. Maintenance of Certification Program entities that were either fully qualified in a prior program year and successfully submitted data, or that administer qualified PQRS registries, will not need to re-qualify. These entities, however, must still self-nominate to participate in the 2014 program year.

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 a self-nomination letter containing all of the following information via email. Include the following in the 2014 PQRS Maintenance of Certification nomination email:

- Provide detailed information regarding the Maintenance of Certification Program with reference to the statutory requirements for such program.
- 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) board. If not an ABMS board, indicate whether and how the program is substantially equivalent to the ABMS Maintenance of Certification Program process.
- Indicate that the program is in existence as of January 1 the year prior to the year in which the entity seeks to be qualified for the Maintenance of Certification Program incentive. For example, to be qualified for the 2014 Maintenance of Certification Program incentive, the entity would be required to be in existence by January 1, 2013.

- 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 from the board that the practice assessment will occur and be completed in the Program practice assessment for completion by the Medicare physician.
- What data is collected under the patient experience of care survey and how this information would be provided to CMS.
- Describe how the Maintenance of Certification program monitors that an EP 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 the year prior to which the entity seeks to be qualified for the Maintenance of Certification Program incentive (for example, measures used in 2013 for the 2014 Maintenance of Certification Program incentive), 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.

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 an interview.

## **QUALIFICATION**

Sponsoring organizations who desire to participate as a Maintenance of Certification Program must submit the following requirements to CMS:

- The name, National Provider Identifier (NPI) and applicable Tax Identification Numbers (TINs) of EPs who would like to participate for the 2014 Maintenance of Certification Program incentives.
- Attestation from the board that the information provided to CMS is accurate and complete.
- The board has signed documentation from physician(s) that they wish to have the information released to CMS.
- Information from the patient experience of care survey.
- Information certifying the EP 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 EP has completed the Maintenance of Certification Program practice assessment at least one time each year the EP participates in the Maintenance of Certification Program Incentive.

Boards that were previously qualified as a Maintenance of Certification Program entity or newly participating boards that utilize a previously qualified registry for their Maintenance of Certification Program data will not need to undergo the qualification process. Previously qualified boards or boards that use a previously qualified registry must still self-nominate to participate in the Maintenance of Certification Program incentive for each year the boards wish to participate.

We anticipate posting the final list of Qualified Maintenance of Certification Program entities in spring 2014 on the PQRS Maintenance of Certification section of the CMS website at (<http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/PQRS>).

Physician(s) desiring to be considered for the 2014 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 PQRS via individual and group practice reporting through the Group Practice Reporting Option or GPRO. Physicians 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 PQRS incentive payment for 2014 for those physician(s) that qualify. It will be a separately identifiable payment on the PQRS feedback report for 2014. The 2014 PQRS 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, 2014 and December 31, 2014. 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 PQRS incentive.

The system shall determine incentive payments for group practices who participate in the GPRO and have EPs who are incentive eligible for the Maintenance of Certification Program incentive payment. If the group practice satisfactorily reports PQRS, 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.

Specialty boards that also desire to send PQRS information to CMS on behalf of EPs 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 2014 Physician Quality Reporting System Data on Behalf of Eligible Professional** for qualification requirements. Boards may also participate as registries for PQRS data provided that they meet the registry requirements. As an alternative to requiring boards to either operate a qualified PQRS 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.

Please refer to <http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/PQRS> for more information regarding the Maintenance of Certification 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.

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

January 15, 2014<sup>1</sup>

2014 PQRS Maintenance of Certification Nomination<sup>2</sup>  
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 ABC<sup>3</sup> 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<sup>4</sup>. Our Board has been in existence since 2013<sup>5</sup>.

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)<sup>6</sup>.

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)<sup>7</sup>.

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<sup>1</sup> Letter must be received no later than **5:00 p.m. ET on January 31, 2014**.

<sup>2</sup> 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, Clinical Data Registry and Maintenance of Certification).

<sup>3</sup> Specify your Sponsoring Organization name and Maintenance of Certification Program Incentive name if the two are different.

<sup>4</sup> 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.

<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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.

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.
- The type of data that will be collected under the patient experience of care survey and how this information will be provided to CMS.
- How the Maintenance of Certification program monitors that an EP has implemented a quality improvement process for their practice
- For previously approved Maintenance of Certification Programs - also note any updates to the program.