

# **The Physician Quality Reporting System Maintenance of Certification Program Incentive Requirements for 2013**

## **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 2013 Physician Quality Reporting System based on the 12-month reporting period (January 1 through Dec 31), the physician will need to complete the following:

- 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 group practice.

AND

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

- 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;
- 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 percent incentive payment in 2013, 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.

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

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 the web by **January 31, 2013**. CMS will provide specific guidance on the website to be used for self-nomination at a later date.

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 2013 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 statement containing all of the following information via the web:

- 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 2013 Maintenance of Certification

Program incentive, the entity would be required to be in existence by 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 from the board that the practice assessment will occur and be completed in the 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.
- Describe 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 the year prior to which the entity seeks to be qualified for the Maintenance of Certification Program incentive (for example, measures used in 2012 for the 2013 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, NPI and applicable TINs of eligible professionals who would like to participate for the 2013 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 eligible professional(s) that the eligible professional wishes to have the information released to us.
- Information from the patient experience of care 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.

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.

Due to a delay in the availability of the testing tool to qualify the boards, we anticipate completing the qualification process by mid-2013 and will post the final list of Qualified Maintenance of Certification Program entities on the Physician Quality Reporting System section of the CMS website (<http://www.cms.gov/pqrs>) at that time.

Physician(s) desiring to be considered for the 2013 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 professionals 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 2013 for those physician(s) that qualify. It will be a separately identifiable payment on the Physician Quality Reporting feedback report for 2013. The 2013 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, 2013 and December 31, 2013. 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 <http://www.cms.gov/pqrs> for more information regarding the Maintenance of Certification Program.

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 2013 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.