NATIONAL PROVIDER CALL:
Physician Quality Reporting System
(Physician Quality Reporting, formerly PQRI)
and
Electronic Prescribing (eRx) Incentive Program

June 21, 2011

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Agenda

- Announcements
- eRx Proposed Rule
- Questions & Answers

ANNOUNCEMENTS

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eRx PROPOSED RULE

eRx Proposed Rule

- On May 26, 2011, CMS proposed changes to the Medicare Electronic Prescribing (eRx) Incentive Program
  - eRx Proposed Rule may be viewed at http://www.gpo.gov/fdsys/pkg/FR-2011-06-01/pdf/2011-13463.pdf
  - 60-day public comment period ends July 25, 2011
- CMS has proposed changes in an effort to address stakeholders' concerns, including:
  - Additional circumstances under which compliance with eRx Payment Adjustment requirements would constitute a significant hardship
  - Inconsistencies between Medicare eRx Incentive Program and the Medicare and Medicaid EHR Incentive Program (which also encourage adoption of health information technology)

Background

- What is Medicare eRx Incentive Program?
  - Program established by Medicare in 2009 to encourage providers to adopt electronic prescribing systems
  - Beginning in 2012, the program is legislatively mandated to assess payment adjustments on eligible professionals who fail to successfully report the eRx measure

Current Requirements: eRx Incentive Program

- Report eRx measure (via claims, qualified registry, or qualified EHR) on at least 25 unique eRx events for patients in the denominator of the measure during the January 1-December 31, 2011 reporting period; and
- 10% of an eligible professional's Medicare Part B PFS charges must be comprised of the codes in the measure's denominator to be eligible for an incentive

Current Requirements: Avoiding 2012 eRx Payment Adjustment

- For individual eligible professionals, the 2012 eRx Payment Adjustment (1.0% less than PFS amount) is NOT applicable if one of the following applies:
  - Eligible professional is NOT a physician (MD, DO, or podiatrist), physician assistant, certified registered nurse anesthetist, or certified nurse midwife as of June 30, 2011 – based on primary taxonomy code in the National Plan and Provider Enumeration System (NPPES); OR
  - Eligible professional does not have prescribing privileges and reports G-code G8644 at least one time on an eligible claim prior to June 30, 2011; OR

Current Requirements: Avoiding 2012 eRx Payment Adjustment (cont.)

- Eligible professional does not have at least 100 cases containing an encounter code in the eRx measure's denominator between January 1 and June 30, 2011; OR
- Eligible professional's total 2011 Medicare Part B PFS allowed charges for all such covered professional services submitted based on codes present in the eRx measure's denominator are less than 10%: OR

Current Requirements: Avoiding 2012 eRx Payment Adjustment (cont.)

- Eligible professional reports a significant hardship code and CMS determines that the hardship code applies; OR
- Eligible professional is a successful electronic prescriber
  - Reports eRx measure via claims for at least 10 unique eRx events for patients in denominator of measure between January 1 and June 30, 2011

Current Requirements: Avoiding 2012 eRx Payment Adjustment (cont.)

- For a group practice participating in eRx Group Practice Reporting Option (GPRO), the 2012 eRx Payment Adjustment is NOT applicable if:
  - Group practice reports a significant hardship code in their 2011 self-nomination letter for participating in Physician Quality Reporting System and eRx Incentive Program as a group practice and CMS determines the hardship exemption applies; OR
  - Group practice is a successful electronic prescriber
    - Depending on size, reports the eRx measure via claims for at least 75-2,500 unique eRx events for patients in the denominator of measure between January 1 and June 30, 2011

Current Requirements: Avoiding 2012 eRx Payment Adjustment (cont.)

- Two significant hardship exemption categories per CY 2011 PFS Final Rule:
  - Eligible professional practices in a rural area without sufficient high-speed Internet access
    - Report G8642
  - Eligible professional practices in an area without sufficient available pharmacies for electronic prescribing
    - Report G8643
  - Must report the G-code at least one time on a claim between January 1 and June 30, 2011

Proposed Changes to eRx Incentive Program

1. Modify existing 2011 eRx measure to address technological requirements
   - Revise current measure's description statement to also recognize certified electronic health technology (EHR) (as defined at 45 CFR 170.102) as a "qualified" eRx system
     - Provides eligible professionals and group practices the option of adopting either a qualified eRx system or certified EHR technology

Proposed Changes to eRx Incentive Program (cont.)

2. Provide additional significant hardship exemption categories for 2012 eRx Payment Adjustment
   - Eligible professional or group practice needs to demonstrate one of the following applicable situations in its significant hardship exemption request:
     - Eligible professionals who register to participate in Medicare EHR Incentive Program or Medicaid EHR Incentive Program and adopt certified EHR technology
     - Inability to electronically prescribe due to local, state, or federal law
     - Limited prescribing activity, or
     - Insufficient opportunities to report eRx measure due to limitations of measure's denominator

Proposed Changes to eRx Incentive Program (cont.)

3. Extend deadline to request significant hardship exemption for the two original hardship exemption categories finalized in CY 2011 MPFS final rule to October 1, 2011 (from June 30, 2011)
   - Would also apply to proposed additional significant hardship exemption categories
   - CMS may allow submission of additional hardship exemptions immediately following publication of 2011 Medicare eRx Incentive Program Standalone Rule

Proposed Changes to eRx Incentive Program (cont.)

4. Allow submission of significant hardship exemption requests for 2012 eRx Payment Adjustment via a web-based tool (if CMS is able to develop such a tool) or a mailed letter

Resources

- CMS eRx Incentive Program website: http://www.cms.gov/ERxIncentive
- eRx Proposed Rule: http://www.cms.gov/ERxIncentive/04_Statute_Regulations.asp > Downloads or directly at http://www.gpo.gov/fdsys/pkg/FR-2011-06-01/pdf/2011-13463.pdf
- Frequently Asked Questions

Where to Call for Help

- **QualityNet Help Desk:**
  866-288-8912 (TTY 877-715-6222)

  7:00 a.m.–7:00 p.m. CST M-F or **qnetsupport@sdps.org**
  - You will be asked to provide basic information such as name, practice, address, phone, and e-mail

CMS Staff

QUESTIONS AND ANSWERS