Quality Payment Program Year 2

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DISCLAIMER: The views and opinions expressed in this presentation are those of the author and do not necessarily represent official policy or position of HIMSS.
Conflict of Interest

Molly MacHarris and Jean Moody-Williams

Have no real or apparent conflicts of interest to report.
Learning Objectives

1. Provide a Quality Payment Program overview
2. Identify the differences between Year 1 and Year 2 of the program
3. Outline requirements for the Merit-based Incentive Payment System (MIPS)
CMS Strategic Goals

• Empower patients and doctors to make decisions about their health care
• Usher in a new era of state flexibility and local leadership
• Support innovative approaches to improve quality, accessibility, and affordability
• Improve the CMS customer experience
Our top priority at CMS is putting patients first.
CMS is committed to reducing unnecessary burden, increasing efficiencies, and improving the beneficiary experience.
Quality Payment Program

Overview
Year 1 of the Quality Payment Program

2017 Performance Year
• Performance period opens January 1, 2017.
• Closes December 31, 2017.
• Clinicians care for patients and record data during the year.

March 31, 2018 Data Submission
• Deadline for submitting data is March 31, 2018.
• Clinicians are encouraged to submit data early.

Feedback
• CMS provides performance feedback after the data is submitted.
• Clinicians will receive feedback before the start of the payment year.

January 1, 2019 Payment Adjustment
• MIPS payment adjustments are prospectively applied to each claim begin January 1, 2019.
Year 1 Submission is Currently Underway

- Visit qpp.cms.gov and look for the login icon at the top of the screen.

- Clinicians who participate in the Quality Payment Program have one place to submit all of their data eliminating the need for multiple visits to multiple websites.
Clinicians will see real-time initial scoring within the Merit-based Incentive Payment System (MIPS) performance categories based on their submissions.
Reporting Data for the Advancing Care Information Performance Category

• You must attest to the first two statements in order to continue submitting data for the Advancing Care Information performance category.
To make it easier for clinicians to search and find information on the Quality Payment Program, CMS has moved its library of QPP resources to CMS.gov.

QPP.CMS.GOV redirects to the CMS.GOV Resource Library:

- Final Rule Materials Posted: https://www.cms.gov/Medicare/Quality-Payment-Program/Quality-Payment-Program.html
The Merit-based Incentive Payment System (MIPS)

If you decide to participate in MIPS, you will earn a performance-based payment adjustment through MIPS.

OR

Advanced Alternative Payment Models (Advanced APMs)

If you decide to take part in an Advanced APM, you may earn a Medicare incentive payment for sufficiently participating in an innovative payment model.

The Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) requires CMS by law to implement an incentive program, referred to as the Quality Payment Program, that provides for two participation tracks:
Quality Payment Program

Considerations

- Improve beneficiary outcomes
- Reduce burden on clinicians
- Increase adoption of Advanced APMs
- Maximize participation
- Improve data and information sharing
- Ensure operational excellence in program implementation
- Deliver IT systems capabilities that meet the needs of users

Quick Tip: For additional information on the Quality Payment Program, please visit qpp.cms.gov.
Merit-based Incentive Payment System (MIPS)
Combined legacy programs into a single, improved program.

- Physician Quality Reporting System (PQRS)
- Value-Based Payment Modifier (VM)
- Medicare EHR Incentive Program (EHR) for Eligible Professionals
Merit-based Incentive Payment System (MIPS)

Who is Included?

MIPS Performance Categories for Year 2 (2018)

- Comprised of **four** performance categories in 2018.
- **So what?** *The points from each performance category are added together to give you a MIPS Final Score.*
- The MIPS Final Score is compared to the MIPS performance threshold to determine if you receive a **positive**, **negative**, or **neutral payment adjustment**.
MIPS Year 2 (2018)

Who is Included for Year 2?
MIPS Year 2 (2018)

Who is Included?

No change in the types of clinicians eligible to participate in 2018

MIPS eligible clinicians include:

- Physicians
- Physician Assistants
- Nurse Practitioners
- Clinical Nurse Specialists
- Certified Registered Nurse Anesthetists
MIPS Year 2 (2018)

Who is Included?

• As a reminder: the definition of Physicians includes:
  – Doctors of Medicine
  – Doctors of Osteopathy (including Osteopathic Practitioners)
  – Doctors of Dental Surgery
  – Doctors of Dental Medicine
  – Doctors of Podiatric Medicine
  – Doctors of Optometry
  – Chiropractors

• With respect to certain specified treatment, a Doctor of Chiropractic legally authorized to practice by a State in which he/she performs this function.
**MIPS Year 2 (2018)**

Who is Included?

*Change to the Low-Volume Threshold for 2018.* Include MIPS eligible clinicians billing more than $90,000 a year in Medicare Part B allowed charges *AND* providing care for more than 200 Medicare patients a year.

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**Transition Year 1 (2017)**

- **Final**
  - BILLING >$30,000
  - >100

**Year 2 (2018) Final**

- BILLING >$90,000
- >200

Voluntary reporting remains an option for those clinicians who are exempt from MIPS.
MIPS Year 2 (2018)

Who is Exempt?

No Change in Basic Exemption Criteria*

- Newly-enrolled in Medicare
  - Enrolled in Medicare for the first time during the performance period (exempt until following performance year)

- Below the low-volume threshold
  - Medicare Part B allowed charges less than or equal to $90,000 a year
  - OR
  - See 200 or fewer Medicare Part B patients a year

- Significantly participating in Advanced APMs
  - Receive 25% of their Medicare payments
  - OR
  - See 20% of their Medicare patients through an Advanced APM

*Only Change to Low-volume Threshold
MIPS Year 2 (2018)

Non-patient Facing

_No Change in Non-Patient Facing Criteria_

**Transition Year 1 (2017) Final**

- **Individual** – If you have <100 patient facing encounters.

- **Groups** – If your group has >75% of NPIs billing under your group’s TIN during a performance period are labeled as non-patient facing.

**Year 2 (2018) Final**

- No change to Individual and Group policy.

- **NEW** - Virtual Groups are included in the definition.
  - Virtual Groups that have >75% of NPIs within a virtual group during a performance period are labeled as non-patient facing.
# MIPS Year 2 (2018)

## Other Special Statuses

<table>
<thead>
<tr>
<th>Special Status</th>
<th>Component</th>
<th>Year 2 (2018) Final</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small Practice</td>
<td>Definition</td>
<td>• Practices consisting of 15 or fewer eligible clinicians.</td>
<td>• No change to the application of these special statuses from Year 1 to Year 2.</td>
</tr>
<tr>
<td>Rural and Health Professional Shortage Areas</td>
<td>Rural and HPSA practice designations</td>
<td>• An individual MIPS eligible clinician, a group, or a virtual group with multiple practices under its TIN (or TINs within a virtual group) with more than 75 percent of NPIs billing under the individual MIPS eligible clinician or group’s TIN or within a virtual group in a ZIP code designated as a rural area or HPSA.</td>
<td></td>
</tr>
</tbody>
</table>
MIPS Year 2 (2018)

Performance Period
## MIPS Year 2 (2018)

### Performance Period

**Change:** Increase to Performance Period

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Performance Category</strong></td>
<td><strong>Minimum Performance Period</strong></td>
<td><strong>Minimum Performance Period</strong></td>
</tr>
<tr>
<td>Quality</td>
<td>90-days minimum; full year (12 months) was an option</td>
<td>Quality</td>
</tr>
<tr>
<td>Cost</td>
<td>Not included. 12-months for feedback only.</td>
<td>Cost</td>
</tr>
<tr>
<td>Improvement Activities</td>
<td>90-days</td>
<td>Improvement Activities</td>
</tr>
<tr>
<td>Advancing Care Information</td>
<td>90-days</td>
<td>Advancing Care Information</td>
</tr>
</tbody>
</table>
MIPS Year 2 (2018)

Timeline for Year 2

- **Performance period** opens January 1, 2018.
- Closes December 31, 2018.
- Clinicians care for patients and record data during the year.

- **Deadline for submitting data is March 31, 2019.**
- Clinicians are encouraged to submit data early.

- CMS provides performance feedback after the data is submitted.
- Clinicians will receive feedback before the start of the payment year.

- **MIPS payment adjustments are prospectively applied to each claim beginning January 1, 2020.**
MIPS Year 2 (2018)

Reporting and Data Submission Options
MIPS Year 2 (2018)

Reporting Options

OPTIONS

1. Individual—under an National Provider Identifier (NPI) number and Taxpayer Identification Number (TIN) where they reassign benefits

2. As a Group
   a) 2 or more clinicians (NPIs) who have reassigned their billing rights to a single TIN*
   b) As an APM Entity

3. As a Virtual Group – made up of solo practitioners and groups of 10 or fewer eligible clinicians who come together “virtually” (no matter what specialty or location) to participate in MIPS for a performance period for a year

* If clinicians participate as a group, they are assessed as a group across all 4 MIPS performance categories. The same is true for clinicians participating as a Virtual Group.
Virtual Groups

• What is a Virtual Group?
  – A virtual group can be made up of solo practitioners and groups of 10 or fewer eligible clinicians who come together “virtually” (no matter what specialty or location) to participate in MIPS for performance period for a year.

• In order to meet the eligibility criteria for 2018, you needed to be a:
  – Solo practitioner who exceeded the low-volume threshold individually, and were not a newly Medicare-enrolled eligible clinician, a Qualifying APM Participant (QP), or a Partial QP choosing not to participate in MIPS.
  – Group that has 10 or fewer eligible clinicians and exceeds the low-volume threshold at the group level.
MIPS Year 2 (2018)

Virtual Groups

• What else do I need to know?
  – Election began prior to the beginning of the 2018 performance period and can no longer be changed.
  – Generally, policies that apply to groups would apply to virtual groups.
  – Virtual groups use same submission mechanisms as groups.
  – All clinicians within a TIN are part of the virtual group.
  – Virtual groups are required to aggregate their across the virtual group for each performance category and will be assessed and scored as a virtual group.
  – If TIN/NPIs is participating in both a virtual group and an APM, such TIN/NPI will receive a final score based on the virtual group performance and a final score based on performance in an APM. However, such TIN/NPI will receive a payment adjustment based on the APM score.
MIPS Year 2 (2018)

Virtual Groups

• Participation in 2018:
  – A virtual group must have been made before the start of the 2018 performance period and include at least the information about each TIN and NPI associated with the virtual group and the virtual group representative’s contact information.
  – A virtual group’s official representative is needed to acknowledge that a formal written agreement has been established between each solo practitioner and group that composes a virtual group.
  – Once the election is made, the virtual group representative must contact the Quality Payment Program Service Center before the applicable submission period starts with any updates to the election information for the applicable performance period.
# MIPS Year 2 (2018)

Who is Included?

**No change:** All of the submission mechanisms remain the same from Year 1 to Year 2

<table>
<thead>
<tr>
<th>Performance Category</th>
<th>Submission Mechanisms for Individuals</th>
<th>Submission Mechanisms for Groups (Including Virtual Groups)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quality</td>
<td>QCDR Qualified Registry EHR Claims</td>
<td>QCDR Qualified Registry EHR CMS Web Interface (groups of 25 or more)</td>
</tr>
<tr>
<td>Cost</td>
<td>Administrative claims (no submission required)</td>
<td>Administrative claims (no submission required)</td>
</tr>
<tr>
<td>Improvement Activities</td>
<td>Attestation QCDR Qualified Registry EHR</td>
<td>Attestation QCDR Qualified Registry EHR CMS Web Interface (groups of 25 or more)</td>
</tr>
<tr>
<td>Advancing Care Information</td>
<td>Attestation QCDR Qualified Registry EHR</td>
<td>Attestation QCDR Qualified Registry EHR CMS Web Interface (groups of 25 or more)</td>
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</table>

Please note:

- Continue with the use of 1 submission mechanism per performance category in Year 2 (2018). Same policy as Year 1.

- The use of multiple submission mechanisms per performance category is deferred to Year 3 (2019).
MIPS Year 2 (2018)
Performance Categories
## MIPS Year 2 (2018)

### Quality

#### Basics:

- **Change:** 50% of Final Score in 2018
- 270+ measures available
- You select 6 individual measures
  - 1 must be an Outcome measure
  - High-priority measure
- You may also select a specialty-specific set of measures

<table>
<thead>
<tr>
<th>Component</th>
<th>Transition Year 1 (2017) Final</th>
<th>Year 2 (2018) Final</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weight to Final Score</td>
<td>• 60%</td>
<td>• 50%</td>
</tr>
<tr>
<td>Data Completeness</td>
<td>• 50% for submission mechanisms except for Web Interface and CAHPS. Measures that do not meet the data completeness criteria earn 3 points.</td>
<td>• 60% for submission mechanisms except for Web Interface and CAHPS. Measures that do not meet data completeness criteria earn 1 point.</td>
</tr>
</tbody>
</table>
MIPS Year 2 (2018)

Quality

Basics:
- **Change:** 50% of Final Score in 2018
- 270+ measures available
- You select 6 individual measures
  - 1 must be an Outcome measure OR
  - High-priority measure
- You may also select a specialty-specific set of measures

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</table>
| Scoring   | • 3-point floor for measures scored against a benchmark.  
            • 3 points for measures that do not have a benchmark or do not meet case minimum.  
            • Bonus for additional high priority measures up to 10% of denominator for performance category.  
            • Bonus for end-to-end electronic reporting up to 10% of denominator for performance category. | • No changes |

No changes
What is the significance?

- A measure may be considered topped out if meaningful distinctions and improvement in performance can no longer be made.
- Topped out measures could have an impact on the scores for certain MIPS eligible clinicians, and provide little room for improvement for the majority of MIPS eligible clinicians.

Topped Out Measures:

- Topped-out measures will be removed and scored on 4 year phasing out timeline.
- Topped out measures with measure benchmarks that have been topped out for at least 2 consecutive years will receive up to 7 points.
- The 7-point scoring policy for the 6 topped out measures identified for the 2018 performance period is finalized. These measures are identified on the next slide.
- Topped out measures will only be removed after a review of performance and additional considerations.
- Topped out policies do not apply to CMS Web Interface measures, but this will be monitored for differences with other submission options.
MIPS Year 2 (2018)

Quality

What is the significance?

• A measure may be considered topped out if meaningful distinctions and improvement in performance can no longer be made.

• Topped out measures could have an impact on the scores for certain MIPS eligible clinicians, and provide little room for improvement for the majority of MIPS eligible clinicians.

Topped Out Measures:

• The six topped out measures include the following:

  • Perioperative Care: Selection of Prophylactic Antibiotic-First or Second Generation Cephalosporin. (Quality Measure ID: 21)

  • Melanoma: Overutilization of Imaging Studies in Melanoma. (Quality Measure ID: 224)

  • Perioperative Care: Venous Thromboembolism (VTE) Prophylaxis (When Indicated in ALL Patients). (Quality Measure ID: 23)

  • Image Confirmation of Successful Excision of Image-Localized Breast Lesion. (Quality Measure ID: 262)

  • Optimizing Patient Exposure to Ionizing Radiation: Utilization of a Standardized Nomenclature for Computerized Tomography (CT) Imaging Description (Quality Measure ID: 359)

  • Chronic Obstructive Pulmonary Disease (COPD): Inhaled Bronchodilator Therapy (Quality Measure ID: 52)
MIPS Year 2 (2018)

Cost

Basics:

• **Change**: 10% Counted toward Final Score in 2018

• Medicare Spending per Beneficiary (MSPB) and total per capita cost measures are included in calculating Cost performance category score for the 2018 MIPS performance period.

• These measures were used in the Value Modifier and in the MIPS transition year

• **Change**: Cost performance category weight is **finalized at 10% for 2018**.

• 10 episode-based measures adopted for the 2017 MIPS performance period will not be used.

• We are developing new episode-based measures with significant clinician input and are providing feedback on these measures this fall through field testing.

• This will allow clinicians to see their cost measure scores before the measures are potentially included in the MIPS program.

• We will propose new cost measures in future rulemaking.
MIPS Year 2 (2018)

Cost

Reporting/Scoring:

- Each individual MIPS eligible clinician’s and group’s cost performance will be calculated using administrative claims data if they meet the case minimum of attributed patients.
- Individual MIPS eligible clinicians and groups are not required to submit any additional information for the cost performance category.
- Performance is compared against performance of other MIPS eligible clinicians and groups during the performance period so benchmark is not based on a previous year.
- Performance category score is the average of the two measures: Medicare Spending per Beneficiary (MSPB) and total per capita cost measures.
- If only one measure can be scored, it will serve as the performance category score.

Basics:

- **Change:** 10% Counted toward Final Score in 2018
- Medicare Spending per Beneficiary (MSPB) and total per capita cost measures are included in calculating Cost performance category score for the 2018 MIPS performance period.
- These measures were used in the Value Modifier and in the MIPS transition year.

Medicare Spending per Beneficiary (MSPB) and total per capita cost measures are included in calculating Cost performance category score for the 2018 MIPS performance period.
MIPS Year 2 (2018)

MIPS: Scoring Improvements

• For Quality:
  – Improvement scoring will be based on the rate of improvement such that higher improvement results in more points for those who have not previously performed well.
  – Improvement will be measured at the performance category level.
  – Up to 10 percentage points available in the Quality performance category.

• For Cost:
  – Improvement scoring will be based on statistically significant changes at the measure level.
  – Up to 1 percentage point available in the Cost performance category.
MIPS Year 2 (2018)

Improvement Activities

Basics:
- 15% of Final Score in 2018
- 112 activities available in the inventory
  - Medium and High Weights remain the same from Year 1
  - Medium = 10 points
  - High = 20 points
- A simple “yes” is all that is required to attest to completing an Improvement Activity

Number of Activities:
- No change in the number of activities that MIPS eligible clinicians must report to achieve a total of 40 points.
- Burden Reduction Aim: MIPS eligible clinicians in small practices and practices in a rural areas will continue to report on no more than 2 activities to achieve the highest score.

Patient-centered Medical Home:
- We finalized the term “recognized” is equivalent to the term “certified” as a patient centered medical home or comparable specialty practice.
- 50% of practice sites* within a TIN or TINs that are part of a virtual group need to be recognized as patient-centered medical homes for the TIN to receive the full credit for Improvement Activities in 2018.

*We have defined practice sites as the practice address that is available within the Provider Enrollment, Chain, and Ownership System (PECOS).
MIPS Year 2 (2018)

Improvement Activities

Additional Activities:

• We are finalizing additional activities, and changes to existing activities for the Improvement Activities Inventory including credit for using Appropriate Use Criteria (AUC) through a qualified clinical support mechanism for all advanced diagnostic imaging services ordered.

Scoring:

• Continue to designate activities within the performance category that also qualify for an Advancing Care Information performance category bonus.

• For group reporting, only one MIPS eligible clinician in a TIN must perform the Improvement Activity for the TIN to receive credit.

• For virtual group reporting: only one MIPS eligible clinician in a virtual group must perform the Improvement Activity for the TIN to receive credit.

• Continue to allow simple attestation of Improvement Activities.

Basics:

• 15% of Final Score in 2018

• 112 activities available in the inventory
  • Medium and High Weights remain the same from Year 1
  • Medium = 10 points
  • High = 20 points

• A simple “yes” is all that is required to attest to completing an Improvement Activity
MIPS Year 2 (2018)

Advancing Care Information

Basics:
• 25% of Final Score in 2018
• Comprised of Base, Performance, and Bonus score
• Promotes patient engagement and the electronic exchange of information using certified EHR technology
• Two measure sets available to choose from based on EHR edition.

CEHRT Requirements:
• Burden Reduction Aim: MIPS eligible clinicians may use either the 2014 or 2015 CEHRT or a combination in 2018.
• A 10% bonus is available for using only 2015 Edition CEHRT.

Measures and Objectives:
• CMS finalizes exclusions for the E-Prescribing and Health Information Exchange Measures.

Scoring:
• No change to the base score requirements for the 2018 performance period/2020 payment year.
• For the performance score, MIPS eligible clinicians and groups will earn 10% for reporting to any one of the Public Health and Clinical Data Registry Reporting measures as part of the performance score.
• For the bonus score a 5% bonus score is available for reporting to an additional registry not reported under the performance score.
• Additional Improvement Activities are eligible for a 10% Advancing Care Information bonus for completion of at least 1 of the specified Improvement Activities using CEHRT.
• Total bonus score available is 25%
MIPS Year 2 (2018)

Advancing Care Information

Basics:

• **25%** of Final Score in 2018

• Comprised of Base, Performance, and Bonus score

• Promotes patient engagement and the electronic exchange of information using certified EHR technology

• Two measure sets available to choose from based on EHR edition.

Exceptions:

• Based on authority granted by the 21st Century Cures Act and MACRA, CMS will reweight the Advancing Care Information performance category to 0 and reallocate the performance category weight of 25% to the Quality performance category for the following reasons:

Automatic reweighting:

– Hospital-based MIPS eligible clinicians;
– Non-Patient Facing clinicians;
– Ambulatory Surgical Center (ASC)—based MIPS eligible clinicians, finalized retroactive to the transition year;
– Nurse practitioners, physician assistants, clinical nurse specialist, certified registered nurse anesthetists

Reweighting through an approved application:

– **New hardship exception for clinicians in small practices** (15 or fewer clinicians);
– New decertification exception for eligible clinicians whose EHR was decertified, retroactively effective to performance periods in 2017.
– Significant hardship exceptions—CMS will not apply a 5-year limit to these exceptions;

• **New deadline of December 31** of the performance year for the submission of hardship exception applications for 2017 and future years.

• Revised definition of hospital-based MIPS eligible clinician to include covered professional services furnished by MIPS eligible clinicians in an off-campus-outpatient hospital (POS 19).
MIPS Year 2 (2018)
Performance Threshold and Payment Adjustment
MIPS Year 2 (2018)
MIPS: Performance Threshold & Payment Adjustment

Change: Increase in Performance Threshold and Payment Adjustment

Transition Year 1 (2017) Final
- 3 point threshold
- Exceptional performer set at 70 points
- Payment adjustment set at +/- 4%

Year 2 (2018) Final
- 15 point threshold
- Exceptional performer set at 70 points
- Payment adjustment set at +/- 5%

How can I achieve 15 points?
- Report all required Improvement Activities.
- Meet the Advancing Care Information base score and submit 1 Quality measure that meets data completeness.
- Meet the Advancing Care Information base score, by reporting the 5 base measures, and submit one medium-weighted Improvement Activity.
- Submit 6 Quality measures that meet data completeness criteria.
# MIPS Year 2 (2018)

**MIPS: Performance Threshold & Payment Adjustment**

**Change: Increase in Performance Threshold and Payment Adjustment**

<table>
<thead>
<tr>
<th>Final Score 2017</th>
<th>Payment Adjustment 2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>≥70 points</td>
<td>• Positive adjustment</td>
</tr>
<tr>
<td></td>
<td>• Eligible for exceptional performance bonus—minimum of additional 0.5%</td>
</tr>
<tr>
<td>4-69 points</td>
<td>• Positive adjustment</td>
</tr>
<tr>
<td></td>
<td>• Not eligible for exceptional performance bonus</td>
</tr>
<tr>
<td>3 points</td>
<td>• Neutral payment adjustment</td>
</tr>
<tr>
<td>0 points</td>
<td>• Negative payment adjustment of -4%</td>
</tr>
<tr>
<td></td>
<td>• 0 points = does not participate</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Final Score 2018</th>
<th>Change Y/N</th>
<th>Payment Adjustment 2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>≥70 points</td>
<td>N</td>
<td>• Positive adjustment greater than 0%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Eligible for exceptional performance bonus—minimum of additional 0.5%</td>
</tr>
<tr>
<td>15.01-69.99 points</td>
<td>Y</td>
<td>• Positive adjustment greater than 0%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Not eligible for exceptional performance bonus</td>
</tr>
<tr>
<td>15 points</td>
<td>Y</td>
<td>• Neutral payment adjustment</td>
</tr>
<tr>
<td>3.76-14.99 points</td>
<td>Y</td>
<td>• Negative payment adjustment greater than -5% and less than 0%</td>
</tr>
<tr>
<td>0-3.75 points</td>
<td>Y</td>
<td>• Negative payment adjustment of -5%</td>
</tr>
</tbody>
</table>
MIPS Year 2 (2018)

Scoring
MIPS Year 2 (2018)
Calculating the Final Score

Remember: All of the performance category points are added together to give you a MIPS Final Score.

The MIPS Final Score is compared to the MIPS performance threshold to determine if you receive a positive, negative, or neutral payment adjustment.
MIPS Year 2 (2018)

Complex Patient Bonus

• Up to 5 bonus points available for treating complex patients based on medical complexity.
  – As measured by Hierarchical Condition Category (HCC) risk score and a score based on
    the percentage of dual eligible beneficiaries.

• MIPS eligible clinicians or groups must submit data on at least 1 performance category in an
  applicable performance period to earn the bonus.
MIPS Year 2 (2018)
Small Practice Bonus

• **5 bonus points** added to the final score of any MIPS eligible clinician or group who is in a **small practice** (15 or fewer clinicians), so long as the MIPS eligible clinician or group **submits** data on at least 1 performance category in an applicable performance period.

• **Burden Reduction Aim:**
  
  – We recognize the challenges of small practices and will provide a 5 point bonus to help them successfully meet MIPS requirements.
MIPS Year 2 (2018)

Facility-based Measurement

• What you know:
  – Facility-based measurement assesses clinicians in the context of the facilities at which they work to better measure their quality.
  – Voluntary facility-based scoring mechanisms will be aligned with the Hospital Value Based Purchasing Program (Hospital VBP) to help reduce burden for clinicians.
  – Eligible as individual: You must have 75% of services in the inpatient hospital or emergency room.
  – Eligible group: 75% of eligible clinicians must meet eligibility criteria as individuals.
  – Measures will be based on Hospital VBP for quality and cost measures.
  – Scores will be derived using the data at the facility where the clinician treats the highest number of Medicare beneficiaries.
  – The facility-based measurement option converts a hospital Total Performance Score in a MIPS quality performance category and cost performance category score.
MIPS Year 1 (2017)

Extreme and Uncontrollable Circumstances

- CMS knows that areas affected by the California wildfires and recent hurricanes, specifically Hurricanes Harvey, Irma, Maria, and Nate – all of which happened in 2017, have experienced devastating disruptions in infrastructure and clinicians face challenges in submitting data under the Quality Payment Program.

- As part of the Quality Payment Program Year 2 final rule, which was released on November 2, 2017, CMS issued an interim final rule with comment period, which includes the Extreme and Uncontrollable Circumstances for the transition year of MIPS.

- This policy specifically addresses extreme and uncontrollable circumstances for the MIPS Advancing Care Information, Quality, and Improvement Activities performance categories in 2017. (It does not apply to the Cost performance category since it has a 0 percent weight in 2017.)
MIPS Year 1 (2017)
Extreme and Uncontrollable Circumstances

• Under this policy, if you are a MIPS eligible clinician who has been affected by Hurricanes Harvey, Nate, Irma, or Maria, or the California wildfires:
  – You do not need to submit an application to reweight the performance categories. CMS will be able to identify you based on the information in the Provider Enrollment, Chain and Ownership System (PECOS).
  – You will automatically receive a neutral MIPS payment adjustment, unless you choose to submit data for any of the MIPS performance categories, in which case you will be scored based on the data you submitted.

• Note: this automatic extreme and uncontrollable circumstances policy only applies to you if you’re a MIPS eligible clinician in an affected area. It does not apply to MIPS eligible clinicians in MIPS Alternative Payment Models (APMs) in 2017 (such as the Medicare Shared Savings Program).

• To learn more, see the 2017 Extreme & Uncontrollable Circumstances Policy Fact Sheet, posted here: https://www.cms.gov/Medicare/Quality-Payment-Program/Resource-Library/Resource-library.html
Quality Payment Program

Help & Support
Technical Assistance

Available Resources

CMS has **free** resources and organizations on the ground to provide help to eligible clinicians included in the Quality Payment Program:

**PRIMARY CARE & SPECIALIST PHYSICIANS**
Transforming Clinical Practice Initiative

- Supports more than 140,000 clinician practices through active, collaborative and peer-based learning networks over 4 years.
- Practice Transformation Networks (PTNs) and Support Allignment Networks (SANs) are located in all 50 states to provide comprehensive technical assistance, as well as tools, data, and resources to improve quality of care and reduce costs.
- The goal is to help practices transform over time and move toward Advanced Alternative Payment Models.
- Contact PTN/SAN [link] for extra assistance.

**LARGE PRACTICES**
Quality Innovation Networks- Quality Improvement Organizations (QIN-QIO)

- Supports clinicians in **large practices** (more than 15 clinicians) in meeting Merit-Based Incentive Payment System requirements through customized technical assistance.
- Includes one-on-one assistance when needed.
- There are 14 QIN-QIOs that serve all 50 states, the District of Columbia, Guam, Puerto Rico, and Virgin Islands.

**SMALL & SOLO PRACTICES**
Small, Underserved, and Rural Support (SURS)

- Provides outreach, guidance, and direct technical assistance to clinicians in **small or solo practices** (1-14 clinicians), particularly those in rural and underserved areas, to promote successful health IT adoption, optimization, and delivery system reform activities.

- Assistance will be tailored to the needs of the clinicians.
- There are 11 SURS organizations providing assistance to small practices in all 50 states, the District of Columbia, Puerto Rico, and the Virgin Islands.
- For more information or for assistance getting connected, contact [SURS link].

**TECHNICAL SUPPORT**

All Eligible Clinicians Are Supported By:

- Quality Payment Program Website: [QPP CMS Website]
  Serves as a starting point for information on the Quality Payment Program.

- Quality Payment Program Service Center
  Assists with all Quality Payment Program questions.
  1-866-286-6292  TTY: 1-877-715-6225  QPP@cms.hhs.gov

- Center for Medicare & Medicaid Innovation (CMMI) Learning Systems
  Helps clinicians share best practices for success, and move through stages of transformation to successful participation in APMs. More information about the Learning Systems is available through your model’s support inbox.

Questions

• Jean Moody-Williams, RN, MPP, Deputy Director of the Center for Clinical Standards and Quality, CMS
• Molly MacHarris, MIPS Program Lead, CMS
### Additional CMS Education Sessions

<table>
<thead>
<tr>
<th>Session</th>
<th>Date</th>
<th>Time</th>
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<tbody>
<tr>
<td>Quality Payment Program: Advancing Care Information</td>
<td>Wednesday, March 7</td>
<td>10-11 a.m.</td>
<td>Lando 4204</td>
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<tr>
<td>Advanced Alternative Payment Models (APMs)</td>
<td>Wednesday, March 7</td>
<td>1-2 p.m.</td>
<td>Lando 4204</td>
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<tr>
<td>Innovation in the Medicaid Enterprise: A State and Federal Priority Partnership</td>
<td>Thursday, March 8</td>
<td>11:30 a.m.-12:30 p.m.</td>
<td>Lando 4204</td>
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<tr>
<td>Quality Payment Program Developer Tools &amp; EHRs Town Hall</td>
<td>Thursday, March 8</td>
<td>1-2 p.m.</td>
<td>Lando 4204</td>
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<tr>
<td>New Medicare Card (SSNRI)</td>
<td>Thursday, March 8</td>
<td>2:30-3:30 p.m.</td>
<td>Lando 4204</td>
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# CMS Office Hours Schedule - Tuesday

<table>
<thead>
<tr>
<th>Booth #10110</th>
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<tr>
<td>Electronic Clinical Quality Measures</td>
<td>2:30-4:30 p.m.</td>
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<tr>
<td>EHR Incentive Program – Medicaid</td>
<td>3-5 p.m.</td>
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<tr>
<td>QPP</td>
<td>4-5 p.m.</td>
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<td><strong>CMS Quality Systems Improvements to Data Access</strong></td>
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