Physician Quality Reporting System (PQRS) Feedback Reports and the PQRS Informal Review Process for Program Year 2015 Results

August 10, 2016
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Agenda and Learning Objectives

- PQRS Negative Payment Adjustment, PQRS Feedback Reports, and PQRS Informal Review
- How to Request an Informal Review
- Where to Call for Help & Resources
- Question & Answer Session
# Acronyms in this Presentation

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<th>Acronym</th>
<th>Description</th>
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<tr>
<td><strong>ACO</strong></td>
<td>Accountable Care Organizations</td>
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<td><strong>CMS</strong></td>
<td>Centers for Medicare &amp; Medicaid Services</td>
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<td><strong>EP</strong></td>
<td>Eligible Professional</td>
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<td><strong>MPFS</strong></td>
<td>Medicare Physician Fee Schedule</td>
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<td><strong>NPI</strong></td>
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<td><strong>PQRS</strong></td>
<td>Physician Quality Reporting System</td>
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<td><strong>PY</strong></td>
<td>Program Year</td>
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<td><strong>QRUR</strong></td>
<td>Quality Resource and Usage Report</td>
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<td><strong>TIN</strong></td>
<td>Tax Identification Number</td>
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<td><strong>VM</strong></td>
<td>Value-Based Payment Modifier</td>
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PQRS Negative Payment Adjustments

Presenter: Bobby Harris
About the Payment Adjustment

- PQRS applies a negative 2% payment adjustment to 2017 payments under the Medicare Physician Fee Schedule (MPFS) to individual eligible professionals (EPs) and PQRS group practices who did not satisfactorily report PQRS data in 2015.
  
  - Individual EPs are identified on claims by their individual National Provider Identifier (NPI) and Tax Identification Number (TIN).
  
  - Group practices participating in PQRS via the group practice reporting option (GPRO) are referred to as PQRS group practices and are identified by their TIN.
• Individual EPs and PQRS group practices must have met the criteria for satisfactorily reporting PQRS data in 2015 for covered professional services to avoid the negative payment adjustment.

• PQRS feedback reports provide detail on the individual EP’s and PQRS group practice’s reporting, performance, and whether or not they are subject to the negative payment adjustment.

• Payment adjustment letters are anticipated to be sent in late summer.
PQRS Feedback Reports

Presenter: Alesia Hovatter
About PQRS Feedback Reports

• Each year, individual EPs and PQRS group practices receive PQRS feedback reports on whether they satisfactorily reported and if they are subject to the future negative payment adjustment.


• PQRS group practices will receive PQRS feedback reports for their 2015 submission.

• 2015 Annual Quality Resource and Usage Reports (QRURs) will be available in fall 2016 and will show the TIN’s actual performance on all of the quality and cost measures used to calculate the 2017 Value Modifier.
A report will be generated for each TIN/NPI combination or PQRS group practice if one of the following scenarios apply:

1. Individual EPs or PQRS group practices submitted PQRS quality data through one of the approved reporting mechanisms.

2. EPs submitted MPFS claims that included denominator-eligible instances but did not submit PQRS quality data.
About PQRS Feedback Reports (cont.)

• PQRS participants and their staff will need an Enterprise Identity Management System (EIDM) account to access 2015 PQRS feedback reports. EIDM is accessible from the CMS Enterprise Portal at https://portal.cms.gov.

• New and existing users are encouraged to request and/or access their accounts to ensure that they have the proper roles to obtain their PQRS feedback reports.
About PQRS Feedback Reports (cont.)

• After you establish an EIDM account with the correct role, follow these steps to access your PQRS Feedback Reports:

2. Select “login to CMS Secure Portal”, accept the Terms and Conditions, and enter your EIDM User ID and password to log in.
3. Select the “PV-PQRS” tab, and the “Feedback Reports” option.
• Quick Reference Guides are available for assistance with roles and EIDM accounts in the **Physician and Other Health Care Professionals Quality Reporting Portal**.

• For more information on 2015 PQRS feedback reports and how to request them, visit the **How to Obtain a Quality Resource and Usage Report (QRUR) webpage**.
Updates to PQRS Feedback Reports: Individual EPs

• The reports provide information about whether an individual EP satisfactorily reported.

• The reports will include the final payment adjustment assessment status.

• The data are displayed in the PQRS feedback reports at 3 different levels:
  – Provider level
  – Reporting mechanism level
  – Measure level

• Reporting rate and available supporting data elements for the measure-applicability validation (MAV) process will be reported.
  – MAV eligibility notes and other satisfactorily reporting criteria addendum notes have been added to the reports.
Updates to PQRS Feedback Reports: Group Practices Participating in PQRS GPRO

• All the criteria used to determine satisfactory reporting are included at the appropriate data level.

• The report will include all providers for the PQRS group practice with their payment adjustment assessment status.

• Reporting mechanism data and measure performance detail will be provided for GPRO registry and GPRO EHR submissions.
  – Please note that the measure performance detail data for GPRO Web Interface submissions will not be reported but will be included in the 2015 QRURs.
PQRS Informal Review

Presenter: Bobby Harris
About PQRS Informal Review

• An informal review is a process that allows individual EPs, Comprehensive Primary Care (CPC) practice sites, PQRS group practices, or Accountable Care Organizations (ACOs) to request a review of their payment adjustment determination.

• With an informal review request, CMS will investigate whether the outcome was appropriate.

• If the determination is made that satisfactory reporting was achieved, CMS will reverse the application of the negative PQRS payment adjustment.

Note: This information applies to the PQRS informal review process only.
3 Steps to Requesting a PQRS Informal Review

Step 1
• Identify WHO will submit the request

Step 2
• Understand WHERE to submit

Step 3
• Know HOW and take action to submit
Who Should Submit a PQRS Informal Review Request

• If you believe that a 2017 negative PQRS payment adjustment was applied in error, you can submit an informal review request.

• Individual EPs or support staff submit a request for an informal review for each TIN/NPI which submitted 2015 PQRS data.
  – The informal review is at the TIN/NPI level; a separate request must be submitted for each TIN an NPI is questioning.

• The group practice reporting via PQRS GPRO or ACO point of contact will need to request an informal review for the PQRS group practice TIN or each individual ACO participant TIN under which 2015 PQRS data was submitted.

• Note: The informal review decision will be final and there will be no further review.
Where and How to Submit a PQRS Informal Review Request

• To submit a 2015 PQRS informal review request, go to the Quality Reporting Communication Support Page (CSP), which is projected to be available fall of 2016.
Where and How to Submit a PQRS Informal Review Request (cont.)

• CMS will announce the availability of the Quality Reporting Communication Support Page (CSP) page through MLN Connects Provider eNews, the PQRS Listserv, and other related CMS listservs.

• For detailed information about submitting an informal review request, please refer to the “2015 Physician Quality Reporting System (PQRS): 2017 Negative Payment Adjustment - Informal Review Made Simple” on the PQRS Payment Adjustment Information webpage.
Top FAQs

**Question:** When can I expect a decision for the informal review?

**Answer:** CMS aims to complete the informal review process prior to the start of the payment adjustment period. Informal review responses will be sent via email to the submitter’s email address. Be sure to check your junk email folders and spam filters for informal review responses. If you have questions about your informal review request, please contact the [QualityNet Help Desk](#).

**Question:** I submitted an informal review request and received a letter stating my informal review was denied. Can I submit an additional informal review request?

**Answer:** The informal review decision is final, and CMS will not conduct any further review. The 2017 payment adjustment will only apply to Medicare Part B Physician Fee Schedule (MPFS) charges during the 2017 PQRS payment adjustment year.
Question: I submitted an informal review request and the response stated that I will not be subject to the payment adjustment. When will the payment adjustment be reversed?

Answer: CMS attempts to complete the informal review process prior to the start of the payment adjustment period. Informal reviews completed prior to the adjustment period are reflected on the payment adjustment file distributed to the Medicare Administrative Contractors (MACs). If informal reviews are conducted after the payment adjustments are applied, new files are distributed periodically to provide the necessary updates. In this case, a reversal is applied and all previously adjusted claims are reprocessed at the correct rate. Yet, there is no exact timeframe as to when this will occur.
**Question:** I submitted an informal review request and the results stated I am no longer subject to the payment adjustment. When will the feedback report reflect the results of the informal review?

**Answer:** The feedback reports will not be regenerated to reflect the change in the payment adjustment decisions. It is recommended that you retain a copy of the feedback reports and the correspondence from the informal review decision for your records. If you need additional information regarding the informal review decision, you may contact the [QualityNet Help Desk](mailto:QualityNetHelpDesk@QualityNet.com).
Where to Call for Help & Resources
Where to Call for Help

QualityNet Help Desk
qnetsupport@hcqis.org
866-288-8912 (TTY 877-715-6222)
Monday-Friday 8:00 am - 8:00 pm ET

Physician Value Help Desk
pvhelpdesk@cms.hhs.gov
888-734-6433 Option 3

You will be asked to provide basic information such as name, practice, address, phone, and email.

Have a question, but not a lot of time?
Email your questions about today’s National Provider Call with the subject: NPC_08102016
Where to Call for Help (cont.)

Provider Contact Center:

See Contact Center Directory

EHR Incentive Program Information Center:

888-734-6433 (TTY 888-734-6563)

Medicare Shared Savings Program Help Desk:

888-734-6433 Option 2 or aposd@cms.hhs.gov

Operational & Program Support: sharedsavingsprogram@cms.hhs.gov

CPC Initiative Help Desk:

800-381-4724 or cpcisupport@telligen.org

Acronyms
Overview of the 2015 Annual Quality and Resource Use Reports

MLN Connects® National Provider Call
Resources

• **PQRS website**
  – Statute Regulation Program Instructions, Analysis and Payment, Payment Adjustment Information, Measure Specifications
• **Medicare FFS Physician Feedback Program/VM website**
  – VM Information, GPRO Registration, QRUR Information
• **Physician Compare website**
• **Communication Support Page website**
  – NPI-level feedback on claims-based reporting
• **A Blueprint for the CMS Measures Management System**
Resources (cont.)

• CMS Enterprise Portal
• Physician and Other Health Care Professionals Quality Reporting Portal
  – Archived Feedback Reports, Enterprise Identity Management (EIDM) information
• The IACS – EIDM User Guide
• The EIDM System Toolkit
  – Packages helpful resources for users, including those who transitioned from IACS to EIDM
• EIDM YouTube training videos
Question & Answer Session
Evaluate Your Experience

Please help us continue to improve the MLN Connects® National Provider Call Program by providing your feedback about today’s call.

To complete the evaluation, visit http://npc.blhtech.com and select the title for today’s call.
CME and CEU

This call is being evaluated by CMS for CME and CEU continuing education credit. For more information about continuing education credit, review the *CE Activity Information & Instructions* document available at the link below for specific details:

Thank You

• For more information about the MLN Connects® National Provider Call Program, please visit http://cms.gov/Outreach-and-Education/Outreach/NPC/index.html.


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