NATIONAL PROVIDER CALL: Understanding the Electronic Prescribing (eRx) Incentive Program 2012 Payment Adjustment

April 19, 2011

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What is the Medicare eRx Incentive Program?

- Provides a combination of incentives and payment adjustments to encourage electronic prescribing

- See http://www.cms.gov/ERXincentive

- To be incentive eligible for 2011, the eligible professional must:
  - Be a successful electronic prescriber (i.e., report the electronic prescribing measure at least 25 times on denominator eligible patient encounters)
  - Have at least 10% of the eligible professional's charges comprised of codes in the denominator of the electronic prescribing measure

2011 eRx Program Details

- 1% incentive payment
- Reporting mechanisms: Claims, Qualified* registry, Qualified* EHR
- Reporting period: January 1-December 31, 2011
- No need to register for eRx Incentive Program
- For successful reporting under the 2011 eRx Incentive Program, a single quality-data code (G8553) should be reported for denominator eligible visits

** Only registries and EHR vendors considered "qualified" for the 2011 Electronic Prescribing Incentive Program are eligible to report this measure using this method.*

eRx Payment Adjustments Planned for Future

- Beginning in 2012, payment adjustments may occur for not being a successful electronic prescriber
  - Applies whether or not eligible professional is planning to participate in EHR Incentive Program
  - Payment adjustment amounts:
    - 2012 – receive 99% of eligible professional's (or group practice's) Part B covered professional services
    - 2013 – receive 98.5%

2012 eRx Payment Adjustment

- **Reporting Period: January 1 – June 30, 2011**
- Reporting Mechanism: Claims only
- Note: Earning an eRx incentive (25 unique eRx events between January 1 and December 31, 2011) for 2011 will not exempt an eligible professional from the payment adjustment (must have 10 unique eRx events between January 1 and June 30, 2011)

How an Individual Eligible Professional Can Avoid 2012 eRx Payment Adjustment

- The eligible professional:
  - is not a Physician (MD, DO, or podiatrist), Nurse Practitioner, or Physician Assistant as of June 30, 2011
    - Based on primary taxonomy code in NPPES or
    - The eligible professional reports the G-code indicating that (s)he does not have prescribing privileges at least once **on a claim(s)** prior to June 30, 2011 (G8644)
  - does not have at least 100 cases containing an encounter code in the measure denominator
  - does not meet the 10% denominator threshold
  - becomes a successful electronic prescriber

How a Group Practice Can Avoid 2012 eRx Payment Adjustment

- For group practices participating in eRx GPRO I or GPRO II during 2011, the group practice must become a successful electronic prescriber
  - Depending on the group's size, report the eRx measure on 75-2,500 unique eRx events for patients in the denominator of the measure for services occurring between January 1 and June 30, 2011

Hardship Exemption for eRx Payment Adjustment

- CMS may, on a case-by-case basis, exempt an eligible professional from the application of the eRx payment adjustment
- This exemption is subject to annual renewal
- For the 2012 eRx payment adjustment, the following circumstances would constitute a hardship:
  - The eligible professional practices in rural area with limited high-speed internet access, or
  - The eligible professional practices in an area with limited available pharmacies that can receive electronic prescriptions

eRx Payment Adjustment

- Summary
  - Beginning in 2012, those identified as not "successful electronic prescribers" may be subject to a payment adjustment
    - **Ensure submission of required number of eRxs (10 for individual, varies for GPROs) before June 30, 2011 OR one of the hardship G-codes to avoid payment adjustment in 2012**
    - Ensure specialty information is correct in NPPES
    - Need a "qualified" eRx system to participate (see http://www.cms.gov/ERXincentive)
    - Only way to report eRx measure to avoid the payment adjustment is ***claims*** but to be incentive eligible you can use claims, a qualified EHR, or qualified registry
    - Check for state-specific eRx requirements; all states allow eRx, but some have certain regulatory requirements
    - It is possible to receive an eRx incentive payment for 2011 AND also an eRx payment adjustment for 2012

Where to Call for Help

- QualityNet Help Desk: 866-288-8912
  (7:00 a.m. – 7:00 p.m. CST M-F) or **qnetsupport@sdps.org**
  (TTY 877-715-6222)
- Also see the:
  - Physician Quality Reporting website http://www.cms.gov/PQRS/ or
  - eRx Incentive Program website http://www.cms.gov/ERxIncentive