The Medicare Promoting Interoperability Program vs. MIPS Promoting Interoperability Performance Category

In 2011, CMS established the Medicare and Medicaid EHR Incentive Programs to encourage eligible clinicians, eligible hospitals, and critical access hospitals (CAHs) to adopt, implement, upgrade, and demonstrate meaningful use of certified EHR technology (CEHRT).

After the Medicare Access and CHIP Reauthorization Act of 2015 was signed into law, CMS introduced a separate Quality Payment Program (QPP) just for Medicare eligible clinicians. These eligible clinicians who had previously participated in the EHR Incentive Programs (currently renamed the Promoting Interoperability Programs), now participate in the Merit-based Incentive Payment System (MIPS), which is one of two ways to participate in QPP.

Only eligible hospitals and CAHs can participate in the Medicare Promoting Interoperability Program while Medicare eligible clinicians participate in QPP.

The chart below highlights the similarities and differences between the Medicare Promoting Interoperability Program and the MIPS Promoting Interoperability Performance Category.

<table>
<thead>
<tr>
<th>CRITERIA FOR MEDICARE PROMOTING INTEROPERABILITY PROGRAM</th>
<th>CRITERIA FOR BOTH PROGRAMS</th>
<th>CRITERIA FOR MIPS PROMOTING INTEROPERABILITY PERFORMANCE CATEGORY</th>
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<tr>
<td>• 100 points total with a required minimum of 50 points</td>
<td>• Minimum of a continuous 90-day required reporting period</td>
<td>• One of 4 performance categories</td>
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| • Report on an additional 4 of 8 clinical quality measures (CQMs) | • Required use of 2015 Edition CEHRT  
  - 2015 Edition CEHRT functionality must be in place by the first day of your performance period  
  - The EHR must be certified by ONC to 2015 Edition CEHRT criteria by the last day of your performance period | • 25% of total MIPS Score |
| • Attest through the CMS Hospital Quality Reporting System (also referred to as the QualityNet Secure Portal) | • Report on 4 objectives | • Submit data through any of the following ways:  
  - Manually submit (attest) through qpp.cms.gov  
  - Upload a file with your data to qpp.cms.gov  
  - Use a third party to submit your data |
| • Hardship exception applications are available after the data submission period has ended | • Must submit a “Yes” to:  
  - The Prevention of Information Blocking Attestation  
  - The ONC Direct Review Attestation  
  - The Security Risk Analysis measure | • Hardship exception applications are available prior to the data submission period |

Where Can You Go for Help?

Eligible hospitals and CAHs participating in the Medicare Promoting Interoperability Program may contact the QualityNet help desk for assistance at qnetsupport@hcqis.org or 1-866-288-8912.

Contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8:00 AM-8:00 PM ET or by e-mail at: QPP@cms.hhs.gov.

Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.