

2014 Physician Quality Reporting System (PQRS): Maintenance of Certification Program Incentive Made Simple

Background

The Physician Quality Reporting System (PQRS) is a voluntary reporting program that provides an incentive payment to identified eligible professionals who satisfactorily report data on quality measures for covered Physician Fee Schedule (PFS) services furnished to Medicare Part B Fee-for-Service (FFS) beneficiaries (includes Railroad Retirement Board and Medicare Secondary Payer).

Physicians who are incentive eligible for 2014 PQRS can receive an additional 0.5% incentive payment when Maintenance of Certification Program Incentive requirements have been met. This physician-only incentive will be paid at the same time as the 2014 PQRS incentive for those physicians who qualify. Physicians cannot receive more than one additional 0.5% Maintenance of Certification Program Incentive, even if they complete a Maintenance of Certification Program in more than one specialty.

The Centers for Medicare & Medicaid Services (CMS) suggests that physicians periodically review posted Maintenance of Certification Program Incentive materials on the CMS PQRS web site at <http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/PQRS> to ensure they are informed of all program clarifications and updates.

Purpose

This Fact Sheet provides steps for successful participation in the Maintenance of Certification Program Incentive. It also explains the role of the qualified Maintenance of Certification Program Incentive entity.

Steps for Successful Participation

- STEP 1:** Determine if you are able to participate. To be eligible for the Maintenance of Certification Program Incentive you must be a board-certified physician.
- STEP 2:** Meet the requirements for satisfactory reporting or satisfactory participation via qualified clinical data registry (QCDR) under PQRS for the 12-month 2014 PQRS reporting period as an individual eligible professional using either individual PQRS measures or measures groups and submitting the PQRS data via claims, registry, direct EHR-based product that is Certified EHR Technology (CEHRT), EHR data submission vendor that is CEHRT, qualified clinical data registry OR participate under the PQRS group practice reporting option (GPRO) for a 12-month reporting period.
- Note: Individual physicians in other quality reporting programs (e.g., Medicare Shared Savings Program (MSSP) Accountable Care Organizations (ACOs), Pioneer ACOs and the Comprehensive Primary Care Initiative) that satisfy PQRS requirements within the respective program are also eligible for the Maintenance of Certification Program Incentive if (s)he meets the requirements. Please check the specific program's requirements for more information.*
- STEP 3:** Identify a Maintenance of Certification Program that has become qualified for purposes of the 2014 PQRS Maintenance of Certification Program Incentive. A list of qualified medical specialty boards or entities sponsoring a Maintenance of Certification Program for 2014 can be found on the CMS PQRS web site at http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/PQRS/Maintenance_of_Certification_Program_Incentive.html. It is recommended that physicians who wish to participate in the 2014 Maintenance of Certification Program Incentive contact their specialty board or other applicable sponsoring entity for additional details on participation requirements.

- STEP 4:** After selecting a sponsoring organization for the Maintenance of Certification Program Incentive, you must more frequently than is required to qualify for or maintain board certification status:
- Participate in a Maintenance of Certification Program for a year, and
 - Successfully complete at least one Maintenance of Certification Program practice assessment for such year that includes a survey of patient experience with care.

What Does “More Frequently” Mean?

Under section 1848(m)(7)(C)(i) of the Social Security Act, a “Maintenance and Certification Program” shall include and require a physician to do the following (referred to below as Parts I-IV).

- I. Maintain a valid, unrestricted medical license in the United States;
- II. Participate in educational and self-assessment programs that require an assessment of what was learned;
- III. Demonstrate through a formalized, secure examination, that the physician has the fundamental diagnostic skills, medical knowledge and clinical judgment to provide quality care in their respective specialty; and
- IV. Successfully complete a qualified Maintenance of Certification Program practice assessment.
Note: Physicians who do not have an available Maintenance of Certification Program practice assessment, through their boards or otherwise, are not eligible for the 0.5 percent incentive.

CMS has applied the “more frequently” participation requirements to Parts I-III of the Maintenance of Certification Program definition above. An eligible professional is required to participate more frequently than is required in at least one of the first two parts (Part II – III). For Part I, Physicians simply need to maintain a valid, unrestricted license in the United States to meet the requirement for “more frequent” participation. The phrase “more frequently” may be interpreted differently by various CMS-qualified Maintenance of Certification Programs.

Part IV, successful completion of a qualified Maintenance of Certification Program practice assessment, must be done for each year the eligible professional participates in the Maintenance of Certification Incentive, regardless of whether or how often the physician is required to participate in a Maintenance of Certification Program to maintain board certification.

What is the Role of a Maintenance of Certification Program Entity?

Maintenance of Certification Program entities will manage the program as well as submit 2014 information on behalf of physicians by **March 31, 2015**. A Maintenance of Certification Program has demonstrated to CMS what constitutes “more frequently” for the Maintenance of Certification Program itself and for the practice assessment for the specific Maintenance of Certification Program of the sponsoring organization.

The final list of Qualified Maintenance of Certification Program entities will be posted by mid-2014 on the PQRS section of the CMS website at http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/PQRS/Maintenance_of_Certification_Program_Incentive.html.

Resources

Reference documents can be found under the downloads section on the CMS PQRS Maintenance of Certification Program Incentive website at http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/PQRS/Maintenance_of_Certification_Program_Incentive.html include:

- *The Physician Quality Reporting System Maintenance of Certification Program Incentive Requirements of Self-Nomination for 2014*
- *Fully Qualified Maintenance of Certification Program Incentive Entities for 2014*

Questions?

Contact your qualified Maintenance of Certification Program with questions. Physicians will need to work with their selected Maintenance of Certification Program to ensure successful completion of the Maintenance of Certification Program Incentive participation requirements. If your entity is unable to answer your questions, please contact the **QualityNet Help Desk** at **866-288-8912** (available 7 a.m. to 7 p.m. CST Monday through Friday, TTY 877-715-6222) or via e-mail at gnetsupport@hcqis.org.

Revision Notes

3/5/2015:

- p. 2 under “What is the Role of a Maintenance of Certification Program Entity” section - revised submission deadline from February 27, 2015 to March 31, 2015.
- p. 3 under “Questions” section – revised QualityNet Help Desk email from gnetsupport@hcqis.org to gnetsupport@hcqis.org.