

MIPS Year 3: Your Questions Answered



CMS issued the final rule for the third year of its Quality Payment Program (QPP), created by MACRA.

CMS says Year 3 of the QPP is designed to:

- Streamline the MIPS program as it moves into full implementation
- Utilize more meaningful measures
- Ease the burden on small and rural practices
- Promote interoperability

There are **two tracks** clinicians can choose from under the QPP:

1

MIPS

MIPS is the Merit-based Incentive Payment System that determines clinicians' performance-based Medicare payment adjustments.

2

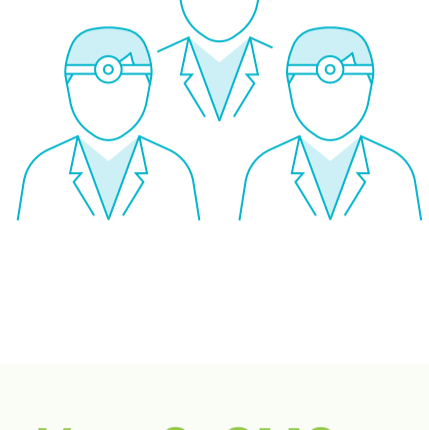
Advanced Alternative Payment Models

For clinicians who receive 50% of their Medicare payments or see 35% of their Medicare patients through certain value-based care models.

CMS estimates that between 165,000 and 220,000 eligible clinicians may qualify for the APM track for payment year 2021.



AM I SUBJECT TO MIPS?



CMS estimates that approximately **800,000 clinicians** will be eligible for MIPS in 2019, the program's third reporting year, which will determine MIPS payment adjustments for 2021. **That's up from approximately 600,000 eligible clinicians in 2018.**

For Year 3, CMS expanded the list of MIPS-eligible clinicians to now include:

- ✓ Physical Therapists
 - ✓ Occupational Therapists
 - ✓ Qualified Speech-Language Pathologists
 - ✓ Qualified Audiologists
 - ✓ Clinical Psychologists
 - ✓ Registered Dieticians or Nutrition Professionals
- In addition to:**
- ✓ Physicians
 - ✓ Physician Assistants
 - ✓ Nurse Practitioners
 - ✓ Clinical Nurse Specialists
 - ✓ Certified Registered Nurse Anesthetists

Clinicians are NOT included in Year 3 of MIPS if they:

- ⊗ Are in their first year of Medicare Part B participation
 - ⊗ Qualify for the Advanced APM track
 - ⊗ Are not one of the MIPS-eligible clinician types
 - ⊗ Meet any of the low-volume threshold criteria:
 - Bill Medicare \$90,000 or less for Part B-allowed services
 - Have fewer than 200 Medicare Part B patients, or
- NEW!** ➤ **Provide 200 or fewer covered professional services under the Physician Fee Schedule (PFS)** ⚡

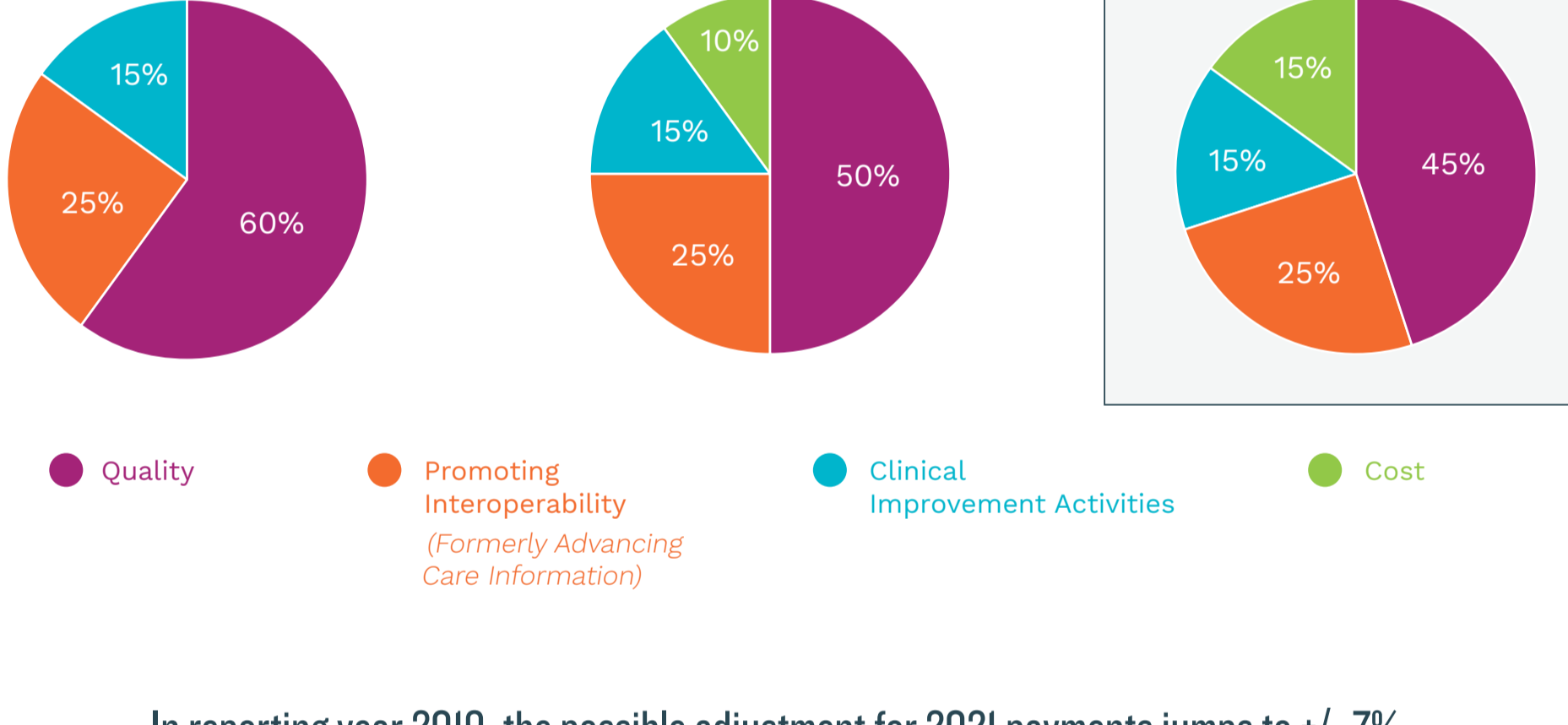


WHAT ARE THE KEY MIPS CHANGES FOR 2019?

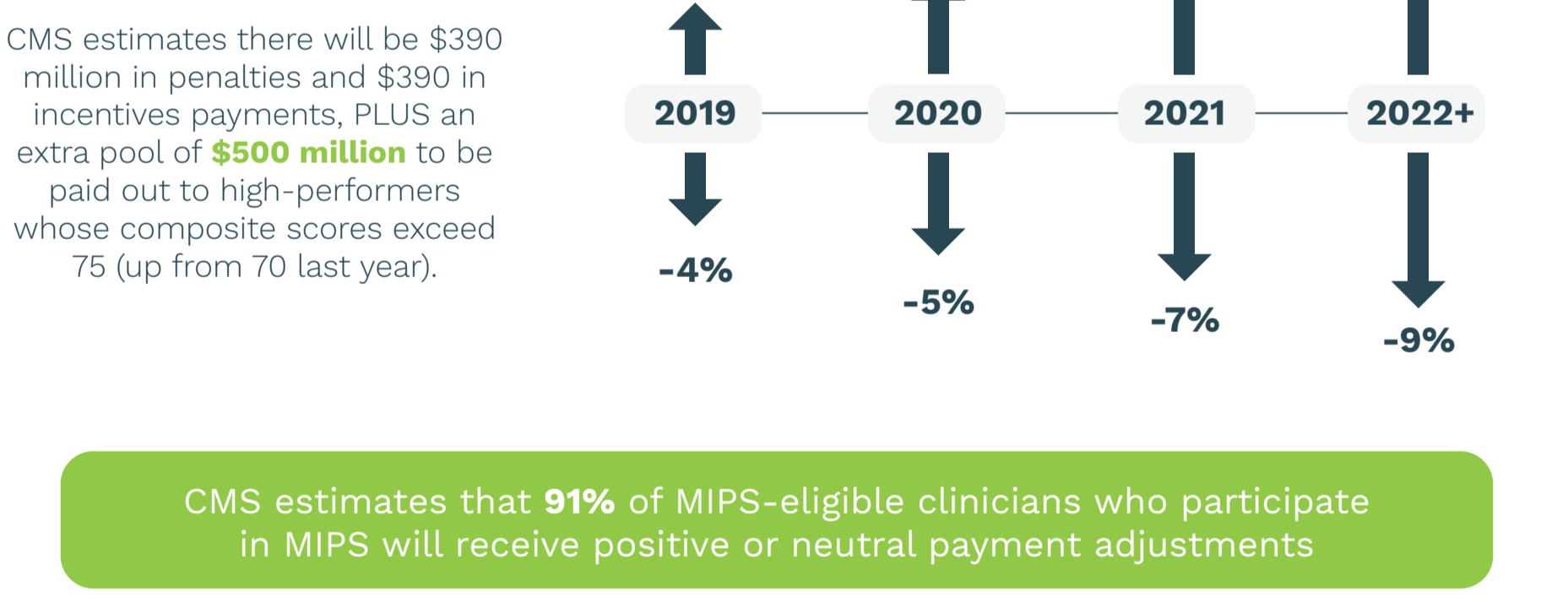
- Performance threshold (the minimum composite score to avoid a penalty) jumps from 15 points in 2018 to 30 in 2019.
- The Advancing Care Information performance category changed to Promoting Interoperability, which has a new scoring methodology based on performance and requires the use of 2015-edition CEHRT.
- Assistance for small-group docs will continue, and their bonus, now included in the Quality category, rises from 5 points to 6.
- CMS removed 26 quality measures and added eight new ones, including Continuity of Pharmacotherapy for Opioid Use Disorder and Zoster Vaccination.
- Clinicians or groups can now opt in to participate in MIPS and try to receive incentive payments if they meet one or two—but not all three—of the low-volume criteria. **NOTE:** If you opt in, you cannot opt out for the rest of that performance period.



HOW WILL MY MIPS SCORE BE CALCULATED?



In reporting year 2019, the possible adjustment for 2021 payments jumps to +/- 7%



CMS estimates that **91%** of MIPS-eligible clinicians who participate in MIPS will receive positive or neutral payment adjustments

Performance Threshold

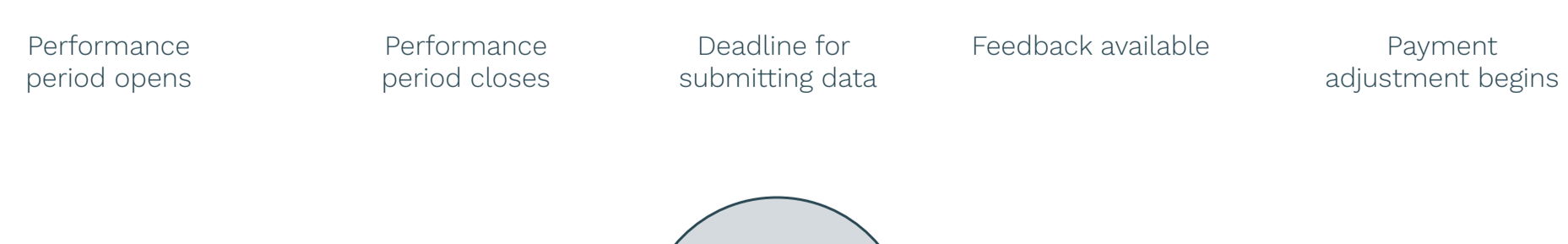


HOW MUCH DATA DO I HAVE TO REPORT?

- Quality**: 12 months
- Promoting Interoperability (Formerly Advancing Care Information)**: 90 days minimum
- Clinical Improvement Activities**: 90 days minimum
- Cost**: 12 months



MIPS TIMELINE



GOOD NEWS!

Data for many MIPS measures can be captured **automatically** during the intake process, including:

- 🔍 MATERNAL DEPRESSION SCREENING
 - 🔍 BREAST CANCER SCREENING
 - 🔍 QUALITY OF LIFE ASSESSMENT FOR PATIENTS WITH HEADACHE DISORDERS
 - 🔍 UNHEALTHY ALCOHOL USE SCREENING
 - 🔍 TOBACCO USE SCREENING
 - 🔍 CERVICAL CANCER SCREENING
 - 🔍 COLORECTAL CANCER SCREENING
 - 🔍 PNEUMOCOCCAL VACCINATION STATUS FOR OLDER ADULTS
 - 🔍 PAIN ASSESSMENT AND FOLLOW-UP
 - 🔍 FUNCTIONAL STATUS ASSESSMENT FOR TOTAL KNEE REPLACEMENT
 - 🔍 FALL RISK ASSESSMENT
 - 🔍 EVALUATION OR INTERVIEW FOR RISK OF OPIOID MISUSE
 - 🔍 DOCUMENTATION OF CURRENT MEDICATIONS
- and more!**