

# 2020 MIPS Participation Without An EHR

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# 2020 MIPS Participation Without An EHR

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# Scoring Comparison With and Without an EHR

	Without	an EHR		With an EHR
Quality	With PI Reweighting	70%	6-point Small Practice Bonus	45%
Promoting Interoperability (PI)	Apply for Exception	0%		25%
Improvement Activities (IA)	Small practices require only 1 high weight activity or 2 medium weight activities	15%	Groups: 50% of clinicians must do activity	15%
Cost	Scored by CMS	15%	Neutral	15%
Total	Performance Threshold	100%	45% Exceptional \$	100%

# **Quality Reporting Criteria**

Requirement	Including	Potential Bonus Points
Submit 6 Quality Measures	1 Outcome or High Priority measure	• Up to 10% for submitting
Or Specialty Measure Set	A minimum 6 measures from the set or all measures if set has fewer than 6	2 or more Outcome or High Priority Quality measures
Data Completeness	<ul> <li>Data completeness standard is reporting 70% of the patients who qualify for each measure</li> <li>3 points if &lt;70% and a small practice</li> <li>Minimum case requirement = 20 cases</li> </ul>	<ul> <li>6 points for clinicians in small practices who submit at least 1 quality measure</li> <li>10 points possible for performance improvement</li> </ul>
Can submit data using different collection types	<ul> <li>Electronic Clinical Quality Measures (e-CQMs)</li> <li>MIPS Clinical Quality Measures (MIPS CQMs)</li> <li>Qualified Clinical Data Registry Measures (QCDR)</li> <li>Medicare Part B Claims Measures</li> <li>Consumer Assessment of Healthcare Providers and Systems (CAHPS) for MIPS Survey</li> </ul>	<ul> <li>over 2019 quality score</li> <li>Complex patient bonus</li> </ul>

# What is the Eligible Measures Applicability (EMA) Process?

#### IF . . .

All Measures are Reported through Medicare Part B Claims and/or MIPS CQMs
 and

 Fewer than 6 Quality Measures or No Outcome/High Priority Measures are Reported

The EMA process determines if additional quality measures or 1 outcome or high priority measure *could* have been submitted and, if needed, adjusts scoring to reflect the number of available clinically applicable measures

Watch a CMS Video on the EMA Process



# How Do Benchmarks Impact Scoring?

Table 1: Using Data Benchmarks to Determine Achievement Points for Measures that Meet Data Completeness and Case Minimum Requirements

Decile	Number of Points Assigned for the 2020 MIPS Performance Period
No benchmark (historical or performance period)	3 points
Below Decile 3	3 points
Decile 3	3-3.9 points
Decile 4	4-4.9 points
Decile 5	5-5.9 points
Decile 6	6-6.9 points
Decile 7	7-7.9 points
Decile 8	8-8.9 points
Decile 9	9-9.9 points
Decile 10	10 points



# How Do Benchmarks Impact Scoring?

Here is an example of a "MIPS CQM" measure with a benchmark which can be reported through a registry such as MIPScast<sup>®</sup>:

Measure Title	Measure ID	Collection Type	Average Performance Rate	Decile 3	Decile 4	Decile 5	Decile 6	Decile 7	Decile 8	Decile 9	Decile 10	Topped Out	Seven Point Cap
Screening for Osteoporosis for Women Aged 65-85 Years of Age	39	MIPS CQM	47.917	0.28 - 3	3.01 - 16.2	16.21 - 48.65	48.66 - 76.99	77 - 94.42	94.43 - 99.53	99.54 - 99.99	100	N	N

In this example, if you have a perfect performance rate of 100%, you will earn 10 points for the measure. However, if the performance rate is 48.66% to 76.99%, the score falls in decile 6 which will earn you between 6 and 6.9 points for the measure.

Download the <u>2020 MIPS Historical Quality Benchmarks spreadsheet and 2020 MIPS</u> Historical Quality Benchmarks Fact Sheet in this webinar's Handouts section.



# How Do Benchmarks Impact Scoring?

# Reporting Measures Without Benchmarks is Risky

196 quality measures can be reported through a registry such as MIPScast<sup>®</sup>,
of which 53 are without benchmarks in 2020

 If no historical benchmark exists and no performance period benchmark can be calculated, then the measure will only receive 3 points regardless of actual performance (even if data completeness and case minimums have been met)



# **Topped Out Measures**

- Topped out measures
- Topped out measures capped at 7 points
  - CMS Benchmark File (shows topped out measures)
- 2020 Quality Measure Benchmark File

Performance Rate   Benchmark   Performance Rate   Performance Rat	A	В	С	D	E	F	G	Н	1	J	K	L	M	N	0	Р	Q
Nodules in Patients 406 MIPS CQM Process Y 5.041 Y 66.08 - 29.91 29.9 - 16.92 16.91 - 4.53 4.52 - 0.01	Measure Title	Measure ID		Measure Type	High Priority			Decile 3	Decile 4	Decile 5	Decile 6	Decile 7	Decile 8	Decile 9	Decile 10	Topped Out	Seve Poir Cap
Process   1   0.25   1   0.38 - 29.59   29.0 - 49.99   75 - 90.99	Appropriate Follow-up Imaging for Incidental Thyroid Nodules in Patients	406	MIPS CQM	Process	Y	5.641	Y	66.08 - 29.91	29.9 - 16.92	16.91 - 4.53	4.52 - 0.01					Y	Y
Soriasis: Clinical Response to Systemic Medications   410   MIPS CQM   Outcome   Y   66.917   Y   1.81 - 15.02   15.03 - 42.9   42.91 - 76.71   76.72 - 96.6   96.61 - 99.99       100   N	pioid Therapy Follow-up Evaluation	408	MIPS CQM	Process	Y	82.263	Y	0.38 - 29.59	29.6 - 74.99	75 - 98.9	98.91 - 99.99				100	Y	Y
Occumentation of Signed Opioid Treatment Agreement 412 MIPS CQM Process Y 84.007 Y 0.97 - 40.91 40.92 - 76.69 76.7 - 99.99 100 Y Opior to Puncture Time for Endovascular Stroke 413 MIPS CQM Intermediate Outcome Y N N	Clinical Outcome Post Endovascular Stroke Treatment	409	MIPS CQM	Outcome	Y		N									N	N
Oor to Puncture Time for Endovascular Stroke 413 MIPS CQM Intermediate Outcome Y N N	Psoriasis: Clinical Response to Systemic Medications	410	MIPS CQM	Outcome	Y	66.917	Y	1.81 - 15.02	15.03 - 42.9	42.91 - 76.71	76.72 - 96.6	96.61 - 99.99			100	N	N
reatment 413 MIPS CQM Intermediate Outcome Y N N	Occumentation of Signed Opioid Treatment Agreement	412	MIPS CQM	Process	Y	84.007	Y	0.97 - 40.91	40.92 - 76.69	76.7 - 99.99					100	Y	Y
		413	MIPS CQM	Intermediate Outcome	Y		N								-	N	N
valuation or Interview for Risk of Opioid Misuse 414 MIPS CQM Process Y 90.229 Y 4.64 - 59.54   59.55 - 96.32   96.33 - 99.99 100 Y	valuation or Interview for Risk of Opioid Misuse	414	MIPS CQM	Process	Y	90.229	Y	4.64 - 59.54	59.55 - 96.32	96.33 - 99.99					100	Y	Y



#### **Inverse Measures**

### Performance Results for Inverse Measures: the Lower the Better

Measure Title	Measure	Decile	Decile	Decile	Decile	Decile	Decile	Decile	Decile
	ID	3	4	5	6	7	8	9	10
Diabetes: Hemoglobin A1c (HbA1c) Poor Control (>9%)	001	79.99 - 70.01	70 - 60.01	60 - 50.01		40 - 30.01	30 - 20.01	20 - 10.01	<=10

This measure is not topped out or capped. Notice that the lower the performance results, the higher the decile and thus the more points awarded for this measure.



# How Many Points Do I Need for a Neutral Payment Adjustment?

# In 2020, 45 Points are Needed for a Neutral Payment Adjustment

- Maximum Improvement Activities category points are 15
- 42.86 gross points (= 30 net points) needed from the Quality and Cost categories
- Quality is weighted at 70% because the Promoting Interoperability exception application (as a small practice) has been submitted and approved
- Cost score is unknown during the performance year
- Small practices earn a 6-point bonus in the Quality performance category, which adds 4.2 points to the MIPS Final Score



# How Many Points Do I Need for a Neutral Payment Adjustment?

# 45 Points are Needed for a Neutral Payment Adjustment

- Plan your work and work your plan
- Careful planning and copious record-keeping is needed
- Pick the measures that are most applicable to your practice
- Start planning and documenting now

The Promoting Interoperability and Extreme and Uncontrollable Circumstances exception applications for 2020 are available now!



**Facility-Based Measurement Scoring** 

**Medicare Part B Claims Reporting** 



#### **KEEP IN MIND**

- CMS has not yet announced changes to the 2020 program year in response to COVID-19
- The maximum payment adjustment is +/- 9%
- Payment adjustment year is 2 years after the corresponding performance year
- If you had planned on submitting data through claims, but haven't started for 2020, you
  can elect to either report only through a registry or both Medicare Part B Claims as well
  as Registry Reporting
- To achieve more than 3 points per measure (as a small practice), data completeness must be at least 70%
  - Claims-based Reporting = 70% of Medicare claims only
  - Registry Reporting = 70% measured across all payers



# **Facility-Based Measurement Scoring**



# Facility-Based Measurement Scoring

Offers clinicians and groups the opportunity to receive scores in the MIPS Quality and Cost performance categories based on the FY 2021 score for the Hospital Value-Based Purchasing (VBP) Program earned by their assigned facility.

#### **Individual ECs qualify when they:**

- Bill at least 75% of their covered professional services in a hospital setting (POS 21, 22 and/or 23);
- Bill at least one service in an inpatient hospital (POS 21) or emergency room (POS 22); and
- Can be assigned to a facility with a FY 2021 Hospital VBP Program score.
   (Note that FY 2021 scores will not be available before December 2020)

#### **Groups and virtual groups qualify when:**

 More than 75% of the clinicians in the practice/virtual group qualify for facility-based measurement as individuals

Eligibility for facility-based measurement scoring is found in the QPP NPI lookup tool



# Facility-Based Measurement Scoring

#### **Election**

- CMS will <u>automatically</u> apply facility-based measurement to MIPS eligible clinicians and groups who are eligible for facility-based measurement *and who would benefit from it*
- There are no submission requirements for individual clinicians in facility-based measurement, but a **group** would need to submit data for the Improvement Activities or Promoting Interoperability performance categories at the *group* level in order to be measured as a facility-based **group**
- From the Facility-based Scoring Quick Start Guide:

If you choose to collect and submit additional MIPS quality measure data, we will use whichever submission results in a higher combined score for the Quality and Cost performance categories:

The Quality and Cost performance category scores based on your facility's FY 2021 Hospital VBP Program score

OR

The Quality performance category score based on the data you collect and submit to MIPS, and the Cost performance category score based on the performance we collect and calculate for you.

• For additional information, access the **2020 Facility-Based Quick Start Guide** 



# **Medicare Part B Claims Reporting**



# Medicare Part B Claims Reporting

- 55 quality measures available to submit through claims:
  - 5 are Outcome measures (including 2 Intermediate-Outcome and 1 Patient-Reported)
  - 32 are High Priority
  - 13 measures do not have benchmarks
- Reference the specification PDFs for your measures selected
- When filing a claim, check the measure's specification sheet to see if the patient should be included and have the quality measures indicated on the HICF 1500
- Download the <u>2020 Medicare Part B Claims Measure Specifications and Supporting Documents</u> zip file



# Medicare Part B Claims – Specification Example

### **Specification Example:**

Measure #236 - Controlling High Blood Pressure (download from the Handouts section of this webinar to follow along):

- 1. Is the patient between 18 and 85 years of age on the date of the encounter?
- 2. Does the patient have a diagnosis of hypertension (ICD-10-CM: I10) overlapping the measurement period?
- 3. Is the encounter code one of (CPT or HCPCS) 99201 to 99205, 99212 to 99215, 99341 to 99345, 99347 to 99350, G0438 or G0439?

If the answers to these 3 questions are yes, continue. If not, the patient isn't eligible for this measure.



# Denominator: Patients 18-85 years of age who had a visit and a diagnosis of hypertension overlapping the measurement period.

- DENOMINATOR NOTE: \*Signifies that this CPT Category I code is a non-covered service under the Physician Fee Schedule (PFS). These non-covered services will not be counted in the denominator population for Medicare Part B claims measures.
- Denominator Criteria (Eligible Cases): Patients 18 to 85 years of age on date of encounter AND
- Diagnosis for hypertension (ICD-10-CM): I10

#### **AND**

Patient encounter during performance period (CPT or HCPCS): 99201, 99202, 99203, 99204, 99205, 99212, 99213, 99214, 99215, 99241\*, 99242\*, 99243\*, 99244\*, 99245\*, 99341, 99342, 99343, 99344, 99345, 99347, 99348, 99349, 99350, 99385\*, 99386\*, 99387\*, 99395\*, 99396\*, 99397\*, G0438, G0439



- This measure is to be submitted a minimum of once per performance period for patients with hypertension seen during the performance period
- The performance period for this measure is 12 months. The most recent quality code submitted will be used for performance calculation
- If no blood pressure is recorded during the measurement period, the patient's blood pressure is assumed "not controlled"



Numerator: Patients whose systolic blood pressure is <140 mmHg and diastolic blood pressure is <90 mmHg during the measurement period.

- Only blood pressures performed by a clinician or remote monitoring device are acceptable for numerator compliance with this measure
- Do not include BP readings taken during an acute inpatient stay or ED visit, taken on the same day as a diagnostic test or diagnostic or therapeutic procedure that requires a change in diet or medication on or one day before the day of the test or procedure, with the exception of fasting blood tests, or a reading reported by or taken by the patient
- If no blood pressure is recorded during the measurement period, the patient's blood pressure
  is assumed "not controlled"
- If there are multiple blood pressure readings on the same day, use the lowest systolic and the lowest diastolic reading as the most recent blood pressure reading



#### Numerator codes to exclude patient from denominator:

- G9740 if hospice services were given to the patient at any time during the measurement period
- G9231 if documentation of ESRD, dialysis, renal transplant before or during the measurement period or pregnancy during the measurement period
- G9910 if patient is aged 66 or older and resides in an Institutional Special Needs Plan or longterm care with a POS code of 32, 33, 34, 54 or 56 for more than 90 days during the measurement period
- G2115 if patient is aged 66 or older with at least 1 claim/encounter for frailty during the
  measurement period and a dispensed medication (Donepezil, Galantamine, Rivastigimine,
  Memantine) for dementia during the measurement period or the year prior to the
  measurement period



#### Numerator codes to exclude patient from denominator:

• G2116 if patient is aged 66 or older with at least 1 claim/encounter for frailty during the measurement period and either 1 acute inpatient encounter with a diagnosis of advanced illness or 2 outpatient, observation, ED, or nonacute inpatient encounters on different dates of service with an advanced illness diagnosis during the measurement period or the year prior to the measurement period



#### **Numerator codes:**

- G8752 most recent systolic blood pressure <140 mmHg</li>
- G8753 most recent systolic blood pressure ≥ 140 mmHg

#### **AND**

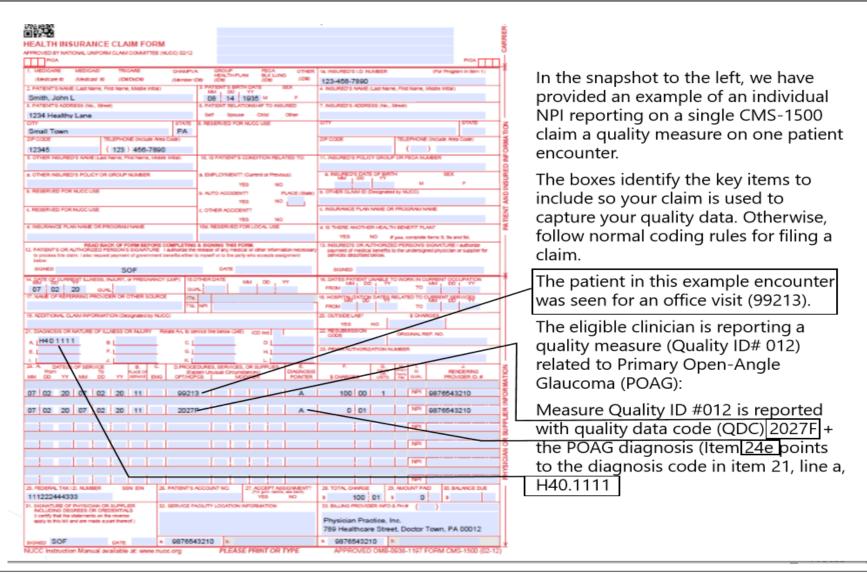
- G8754 most recent diastolic blood pressure <90 mmHg</li>
- G8755 most recent diastolic blood pressure ≥90 mmHg

#### OR

• G8756 no documentation of blood pressure measurement, reason not given



# Sample CMS 1500 Claim







- Use the 2020 MIPS Historical Quality Benchmarks file (download now from the webinar's Handout section) to identify measures most appropriate to your practice.
   Filter for Collection Type "MIPS CQM" for measures that can be submitted through a Qualified Registry (QR), like MIPScast®, or a Qualified Clinical Data Registry (QCDR)
- There are 196 quality measures available to submit through a Registry (QR or QCDR):
  - 57 are Outcome measures (including 6 Intermediate-Outcome and 17 Patient-Reported)
  - 136 measures are High Priority
  - 53 measures do not have benchmarks
- Download the <u>2020 Clinical Quality Measure Specifications and Supporting</u>
   <u>Documents</u> zip file
- Reference the specification sheet PDFs for the selected measures

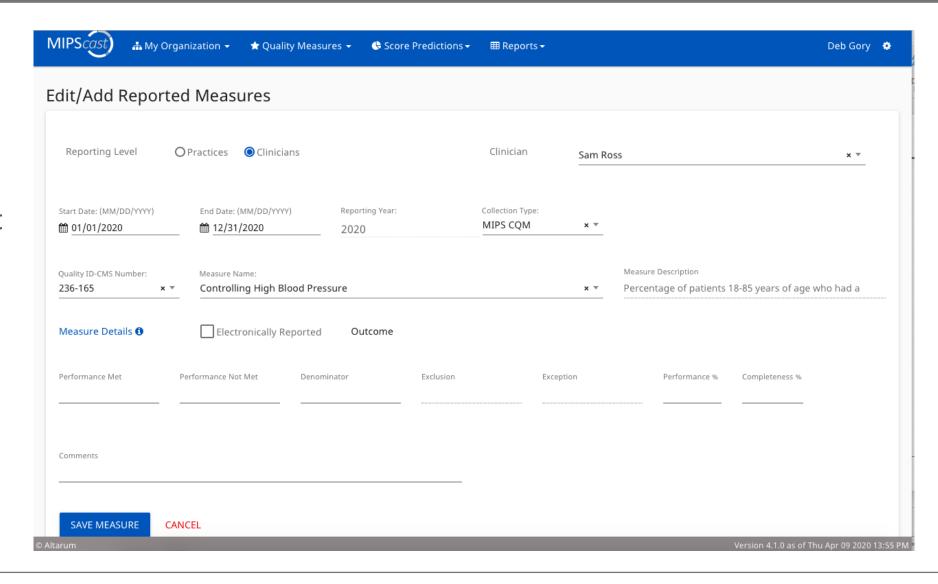


- Gathering data for reporting to a registry requires systematized record-keeping and documentation of all patients seen across all payers which CMS can audit
- Aggregated reporting through a Qualified Registry (QR) such as MIPScast® can be simple when the data has been compiled over the span of the reporting period
- Let's look at the information needed for our Qualified Registry, MIPScast®

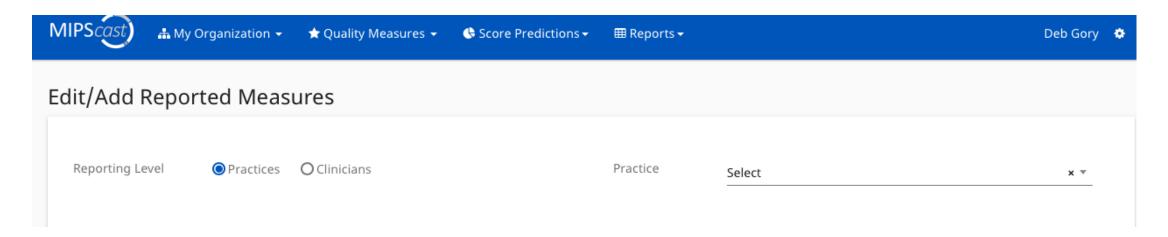


 Add 1 measure manually from aggregated data compiled throughout the year

Now to zoom in...







- You've logged in, so "My Organization" only contains data about your practice
- You've selected Quality Measures Add measures manually
- Next choose if you will report by Practice or Clinician, then click on the down arrow on the far right and select the Practice or Clinician to work with



 Start Date: (MM/DD/YYYY)
 End Date: (MM/DD/YYYY)
 Reporting Year:
 Collection Type:

 шр 01/01/2020

 шр 12/31/2020

 шр 2020

 шр 2020

- While you can enter data early to forecast your score, this sample represents the calendar year 2020 so enter the start and end dates that correspond
- Reporting Year should be 2020
- For Collection Type click on the down arrow and select "MIPS CQM"



 You can simply begin keying in the value in the Quality ID field or use the down arrow to scroll and find it. The other fields auto-fill

Quality ID-CMS Number: Measure Name: Measure Description

236-165 x \* Controlling High Blood Pressure x \* Percentage of patients 18-85 years of age who had a

- Here we've selected Quality ID 236, Controlling High Blood Pressure as we covered much of this information in Medicare Part B Claims
- However, the measure's criteria is different for the MIPS CQM collection type (i.e. each collection type for a measure is treated as its own distinct measure)



Measure Details 6

Electronically Reported

Outcome

- The next section shows that the measure selected is an Outcome measure
- If you'd like more information about the measure you've selected, click on "Measure Details" which will bring up the same PDF linked to earlier in this webinar



Performance Met	Performance Not Met	Denominator	Exclusion	Exception	Performance %	Completeness %
Comments						

# The fields which you will need to be prepared to fill in:

- Performance Met
- Performance Not Met
- Denominator
- Exclusion
- Exception
- Comments



Don't forget to "Save Measure"!



- So, how can the data be compiled to fill in the fields for each measure?
  - The following slides have one idea using the Quality Measure 236 Controlling High Blood Pressure



# Registry Reporting – Specification Example

### **Specification Example:**

MIPS CQM Measure #236 - Controlling High Blood Pressure (download from the Handouts section of this webinar to follow along):

- 1. Is the patient between 18 and 85 years of age on the date of the encounter?
- 2. Does the patient have a diagnosis of hypertension (ICD-10-CM: I10) overlapping the measurement period?
- 3. Is the encounter code one of (CPT or HCPCS) 99201 to 99205, 99212 to 99215, 99241\* to 99245\*, 99341 to 99345, 99347 to 99350, 99385\* to 99387\*, 99395\* to 99397\*, G0438, G0439?

#### AND...



# Registry Reporting – Specification Example (continued)

#### **Denominator Exclusions:**

- G9740 Hospice services were given to the patient at any time during the measurement period
- G9231 Documentation of ESRD, dialysis, renal transplant before or during the measurement period or pregnancy during the measurement period
- G9910 Patient is aged 66 or older and in Institutional Special Needs Plan or residing in long-term care with a POS code of 32, 33, 34, 54 or 56 for more than 90 days during the measurement period
- G2115 Patient is aged 66 or older with at least 1 claim/encounter for frailty during the measurement period and a dispensed medication (Donepezil, Galantamine, Rivastigimine, Memantine) for dementia during the measurement period or the year prior to the measurement period



# Registry Reporting – Specification Example (continued)

### **Denominator Exclusions (continued):**

 G2116 Patient is aged 66 or older with at least 1 claim/encounter for frailty during the measurement period and either 1 acute inpatient encounter with a diagnosis of advanced illness or 2 outpatient, observation, ED, or nonacute inpatient encounters on different dates of service with an advanced illness diagnosis during the measurement period or the year prior to the measurement period



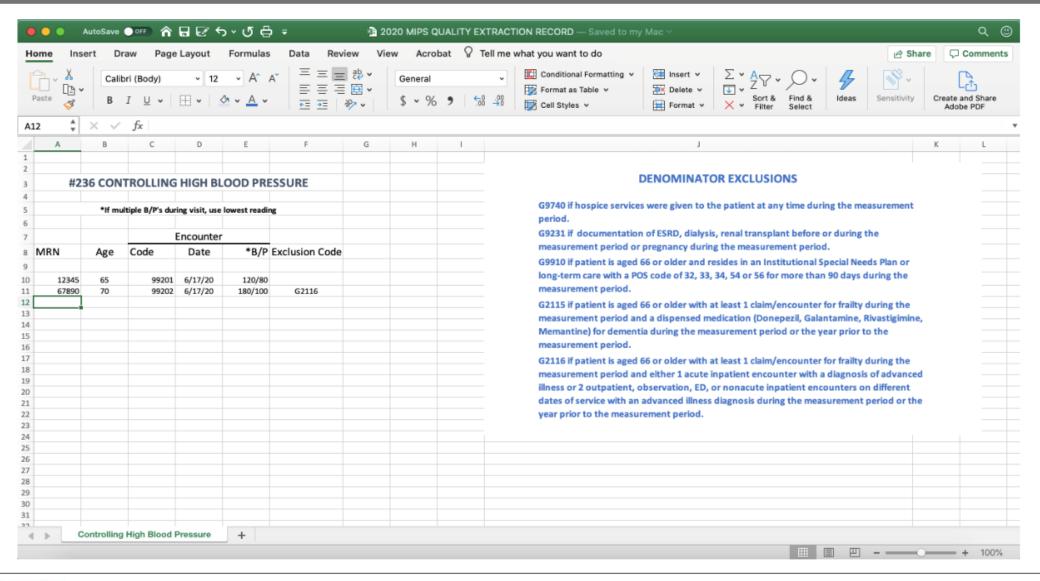
# Registry Reporting – Specification Example (continued)

# Numerator: Patients whose systolic blood pressure is <140 mmHg and diastolic blood pressure is <90 mmHg during the measurement period

- Only blood pressures performed by a clinician or remote monitoring device are acceptable for numerator compliance with this measure
- Do not include BP readings taken during an acute inpatient stay or ED visit, taken on the same day as a diagnostic test or diagnostic or therapeutic procedure that requires a change in diet or medication on or one day before the day of the test or procedure, with the exception of fasting blood tests, or a reading reported by or taken by the patient
- If no blood pressure is recorded during the measurement period, the patient's blood pressure is assumed "not controlled"
- If there are multiple blood pressure readings on the same day, use the lowest systolic and the lowest diastolic reading as the most recent blood pressure reading



# Registry Reporting – Record Extraction Example





#### **TODAY'S TAKEAWAY**

 YOU CAN BE A SUCCESSFUL REPORTER FOR MIPS IN 2020 WITHOUT AN EHR!!!

• **Be Aware:** The MIPS Final Score minimum performance threshold (to avoid a penalty) will continue to increase (i.e. 60pts in 2021) ... which makes participating in MIPS without an EHR more challenging each year



#### Resources

#### **QPP Resource Center**

https://www.qppresourcecenter.org/

#### **QPP CMS Web site**

www.qppcms.gov

#### **CMS Claims Quick Start Guide**

Claims Quick Start Guide

#### **2020 Medicare Part B Claims Measure Specifications**

<u>2020 Medicare Part B Claims Measure Specifications and Supporting Documents</u> zip file (this will take you to the page and then you have to choose this document)

#### **2020 Clinical Quality Measure Specifications**

<u>2020 Clinical Quality Measure Specifications and Supporting Documents</u> zip file (this will take you to the page and then you have to choose this document

<u>Promoting Interoperability and Extreme and Uncontrollable Circumstances exception applications</u>



#### Free Technical Assistance

CMS has no cost resources and organizations on the ground to provide help to clinicians who are participating in the Quality Payment Program:



#### Small & Solo Practices

Small, Underserved, and Rural Support (SURS)

- Provides outreach, guidance, and direct technical assistance to clinicians in solo or small practices (15 or fewer), particularly those in rural and underserved areas, to promote successful health IT adoption, optimization, and delivery system reform activities.
- Assistance will be tailored to the needs of the clinicians.
- There are 11 SURS organizations providing assistance to small practices in all 50 states, the District of Columbia, Puerto Rico, and the Virgin Islands.
- For more information or assistance getting connected, contact QPPSURS@IMPAQINT.com.

#### **Technical Support**

All Eligible Clinicians Are Supported By:

- Quality Payment Program Website: qpp.cms.gov
   Serves as a starting point for information on the Quality Payment Program.
- Quality Payment Program Sevice Center
   Assists with all Quality Payment Program questions.
   1-866-288-8292 TTY: 1-877-715-622 QPP@cms.hhs.gov
- Center for Medicare & Medicaid Innovation (CMMI) Learning Systems
   Helps clinicians share best practices for success, and move through stages of transformation to successful participation in APMs. More information about the Learning Systems is available through your model's support inbox.

Go to <a href="https://www.qppresourcecenter.org">www.qppresourcecenter.org</a> and click "Join Now"



# **Poll Question**

How satisfied are you with today's presentation?

(On a scale from 1 to 5 – with 5 being Very Satisfied)







# **Questions?**

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