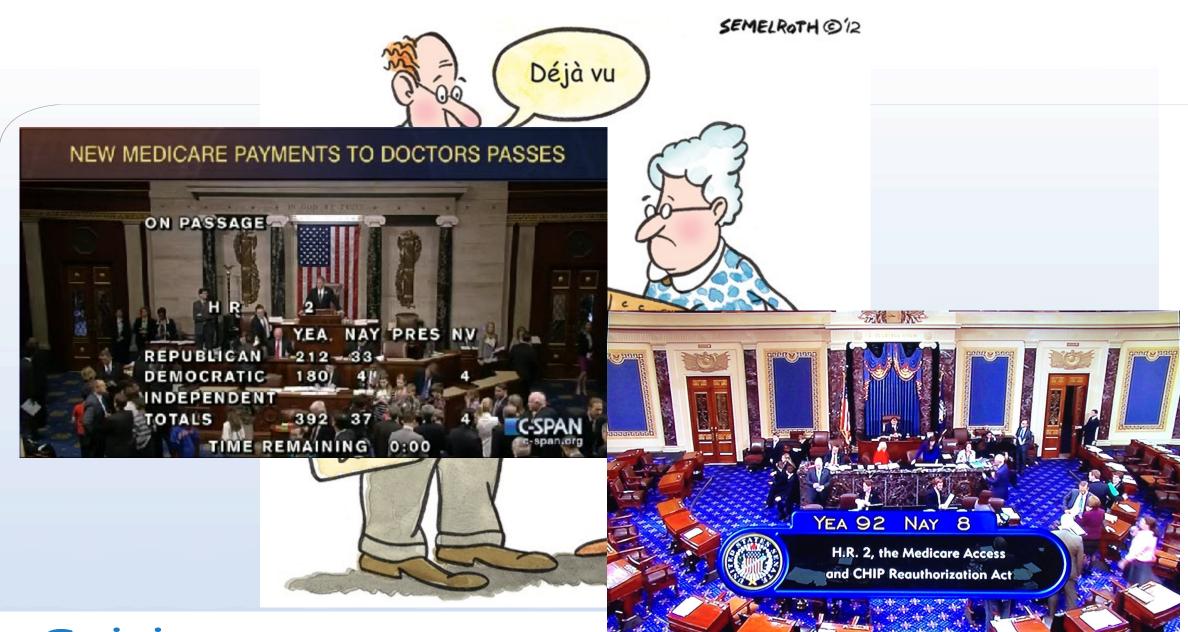




Medicare Access and CHIP Reauthorization Act HR 2 of 2015

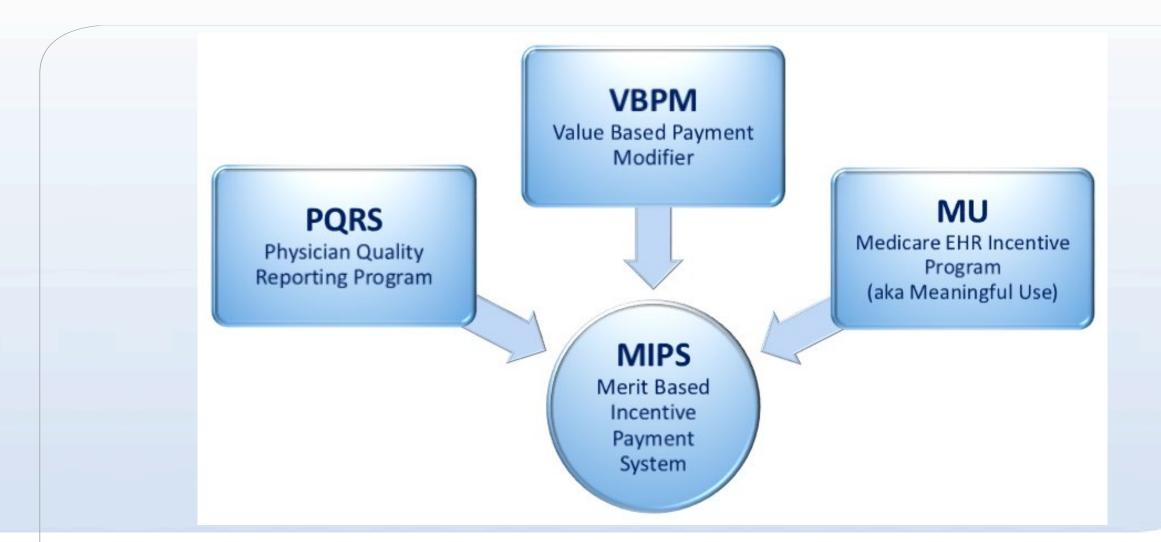
John B. Bulger, DO, MBA Chief Medical Officer, Geisinger Health Plan



### Acronyms

MACRA = Medicare Access and CHIP Reauthorization Act
MIPS = Merit-based Incentive Payment System
APM = Alternative Payment Model
AAPM = Advanced Alternative Payment Model
QRUR = Quality and Resource Use Report
ACI = Advancing Care Improvement
CPIA = Clinical Practice Improvement Activities

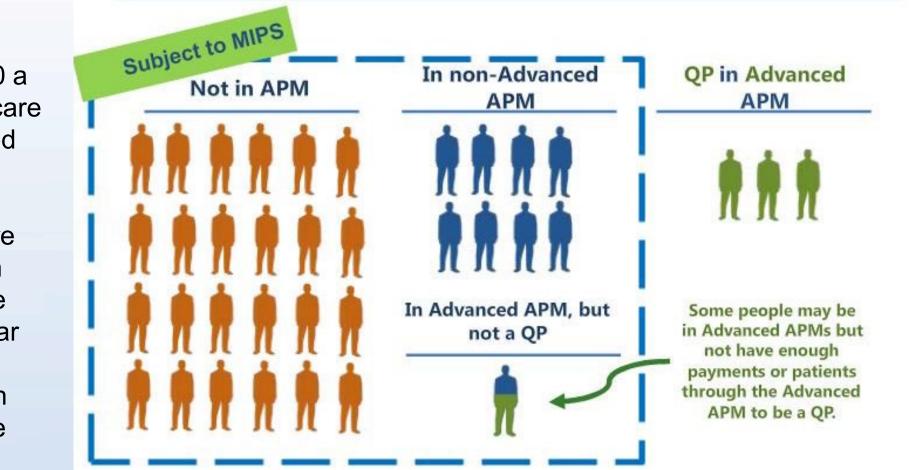
### How did we get here?



### Who is eligible?

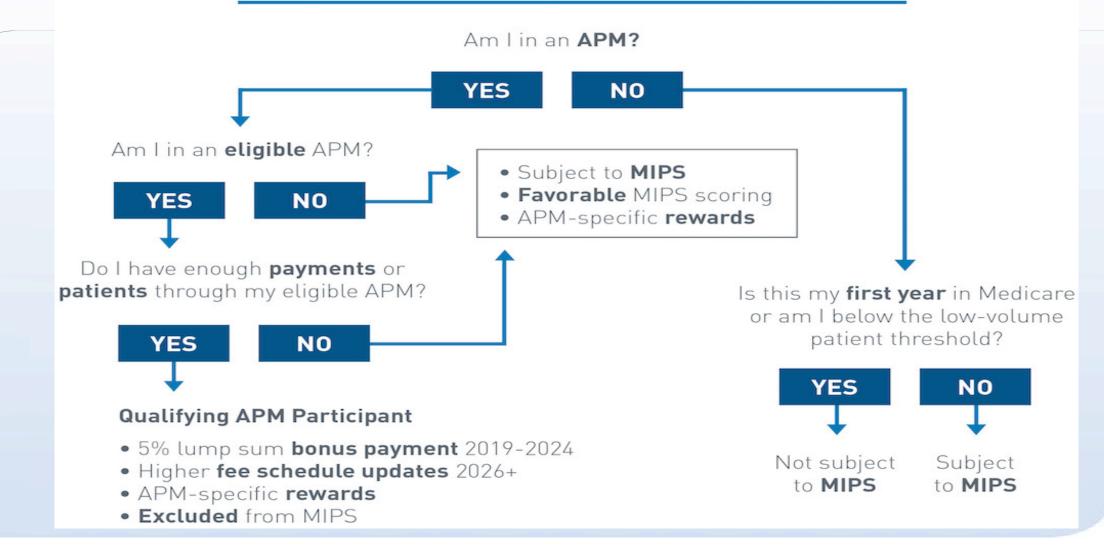
Over \$90,000 a year in Medicare Part B allowed charges AND Providing care for more than 200 Medicare patients a year AND Bill more than 200 Medicare Services

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https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Value-Based-Programs/MACRA-MIPS-and-APMs/QPP-for-small-and-rural-slides.pdf

### **Determine Your MACRA Pathway**



# How Do I Check If I am Eligible to Participate in MIPS?

To check if you're eligible to participate in MIPS in 2019, enter your 10-digit National Provider Identifier in the <u>Quality Payment Program Participation Status</u> <u>Tool on the Quality Payment Program website</u>.



### **Advanced APMs**

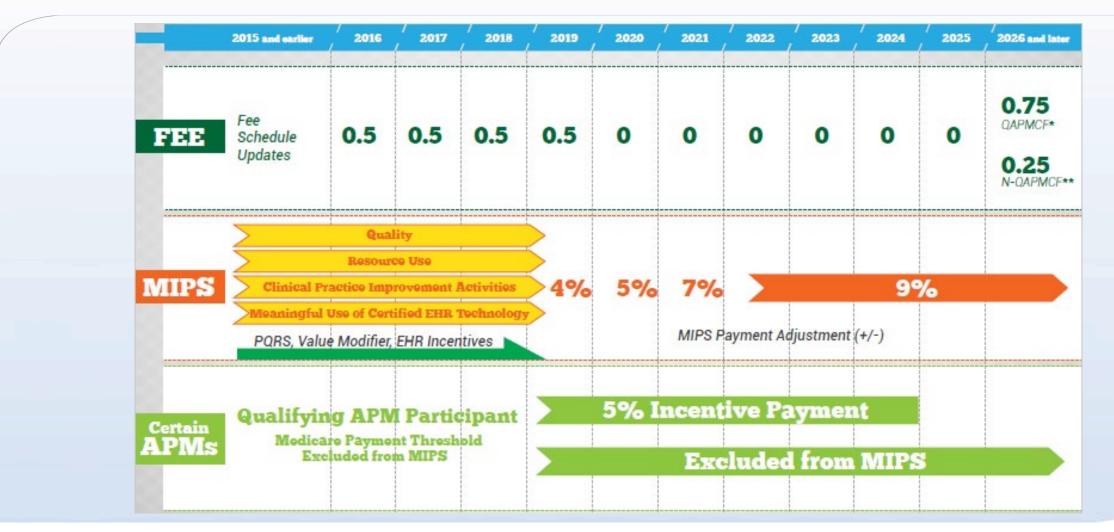
- Comprehensive ESRD Care
   (CEC) Two-Sided Risk
- Comprehensive Primary Care
   Plus (CPC+)
- Next Generation ACO Model
- Shared Savings Program Track 2, Track 3, Track 1+
- Oncology Care Model (OCM) Two-Sided Risk
- Comprehensive Care for Joint Replacement (CJR) Payment Model (Track 1- CEHRT)
- Vermont and Maryland

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Table 1: Requirements for APM Incentive Payments for Participation in Advanced APMs (Clinicians must meet payment or patient requirements)

Performance Year	2017	2018	2019	2020	2021	2022 and later
Percentage of Medicare Payments through an Advanced APM	25%	25%	50%	50%	75%	75%
Percentage of Medicare Patients through an Advanced APM	20%	20%	35%	35%	50%	50%

### **MACRA** Timeline



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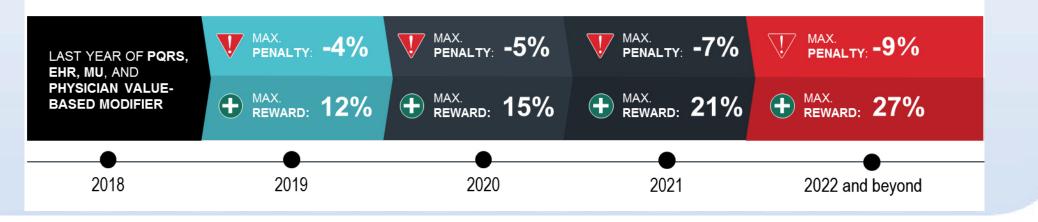
- Qualifying APM Conversion Factor
- Non-qualifying APM Conversion Factor

9

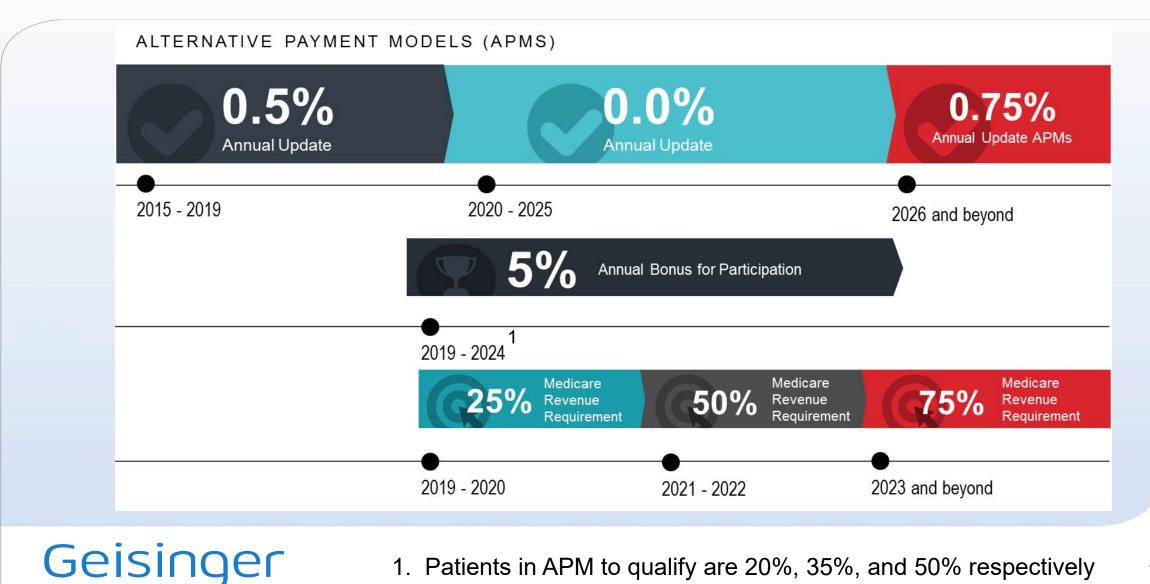




#### MERIT-BASED INCENTIVE PAYMENT SYSTEM (MIPS)

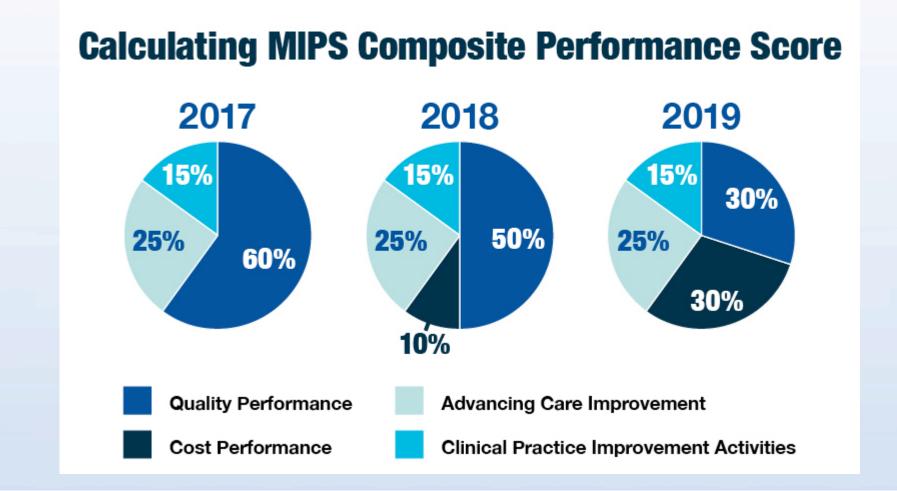


### **Advanced-APM Track**



1. Patients in APM to qualify are 20%, 35%, and 50% respectively 11

### **MIPS Weighting**



**Geisinger** Proposed rule keeps Quality at 60% through 2019, then 30% in 2020. It keeps Cost at 0% for 2018, but CMS is asking for comments.

### **MIPS Weighting**

Performance in MIPS is measured through the data clinicians report in four areas: Quality, Cost, Improvement Activities, and Promoting Interoperability. The performance categories have different "weights" and are added together to give you a MIPS final score. <u>Explore the measures</u> for each category on the Quality Payment Program website.



You can participate in MIPS as an individual, group, or virtual group. Learn more by visiting the Quality Payment Program <u>website</u>.

### **MIPS-APM** Track

- You participate in an APM, but it is not an Advanced-APM
- Scoring is the same for the entire APM
- Gain full credit for Advancing Care Improvement
- Do not have to report separately for quality







### What to think about now

### **Submission Methods**

	ក្ពុំ Individual	ကိုဂိုကို Group
Quality	<ul> <li>Qualified Clinical Data Registry (QCDR)</li> <li>Qualified Registry</li> <li>EHR</li> <li>Claims</li> </ul>	<ul> <li>QCDR</li> <li>Qualified Registry</li> <li>EHR</li> <li>Administrative Claims</li> <li>CMS Web Interface</li> <li>CAHPS for MIPS Survey</li> </ul>
Improvement Activities	<ul> <li>QCDR</li> <li>Qualified Registry</li> <li>EHR</li> <li>Attestation</li> </ul>	<ul> <li>QCDR</li> <li>Qualified Registry</li> <li>EHR</li> <li>CMS Web Interface</li> <li>Attestation</li> </ul>
Advancing Care Information	<ul> <li>QCDR</li> <li>Qualified Registry</li> <li>EHR</li> <li>Attestation</li> </ul>	<ul> <li>QCDR</li> <li>Qualified Registry</li> <li>EHR</li> <li>Attestation</li> <li>CMS Web Interface</li> </ul>

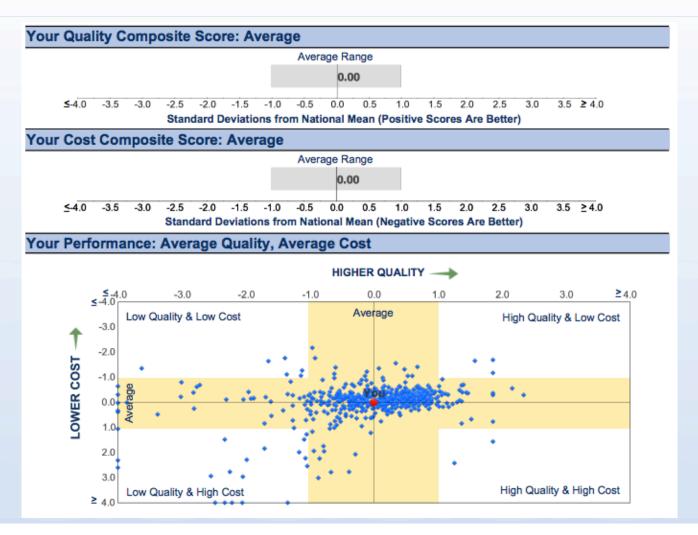
CMS

\*Must be reported via a CMS approved survey vendor together with another submission method for all other Quality measures.

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### **Quality and Resource Use Report**



### **Understanding Attribution**

Did the patient see a primary care provider or not?

What episodes happened in the year?

Specialty care versus primary care?

Understanding how episodes are triggered?

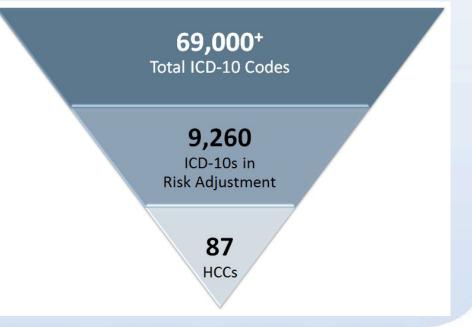


### **Assessment of disease burden**

Accurate coding helps reflect the disease burden of the population

This enables appropriate case and disease management

It impacts cost performance



Quality Payment

# What are the data submission requirements for the Quality performance category?

OR.

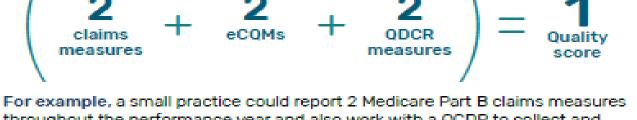
The Quality performance category has a 12-month performance period (January 1 – December 31, 2019) for which groups will need to:

- Report at least 6 measures; of the 6 quality measures, groups need to select 1 outcome measure or a high priority measure if an outcome measure is not available;
- Report at least six measures from a specialty measure set, unless the set contains fewer measures; of the 6 quality measures, groups
   OR need to select one outcome measure, or a high priority measure if an outcome measure is not available;
- Register for the CMS Web Interface and report on all of the CMS Web Interface measures.

Groups are encouraged to select the quality measures that are most appropriate for their practice and patient population.

New for 2019: With the exception of the CMS Web Interface, groups can now report measures from a combination of collection types for a single Quality performance category score.

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throughout the performance year and also work with a QCDR to collect and report 2 eCQMs and 2 QCDR measures on their behalf during the 2019 submission period. All 6 of these measures would contribute to a single Quality performance category score for the group.

# Advancing Care Information (the artist formerly known as Meaningful Use)

Base	Performance	Bonus	Performance
Score	Score	Points	Category Score
<b>50 points</b> Full credit awarded for providing numerator / denominator information or yes / no answers for each measure and objective.	up to 90 points Percentage of patients with a met performance on specified measures aimed at emphasizing patient care and information access.	up to 15 points Report to additional public health & clinical data registries beyond the Immunization Registry Reporting measure (5 points) and/or report IA through CEHRT (10 points).	≥100 points Scoring 100 points or higher in the ACI Performance Category counts as full credit for the ACI portion of the MIPS CPS (25%).

### **Clinical Practice Improvement Activities**

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### Total Activity Points

### 0 - 40 points

10 points awarded for attesting to a medium-weight activity, 20 points awarded for a high-weight activity.

### Total Possible Points

### 40 points

For non-patient facing clinicians, HPSA clinicians, and small practices, the total possible points will be 20.

### Performance Category Score

### 0 - 100%

If you take this percentage, and multiply it by 15% you will get the final points earned for the IA portion of the MIPS CPS in 2017.

Small Practices (less than 15) or HPSAs (Healthcare Professional Shortage Areas) are only required to report 20 points (1 or 2 activities)

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Participation in an Alternative Payment model is already worth 20 points, so only 20 additional points would be needed.

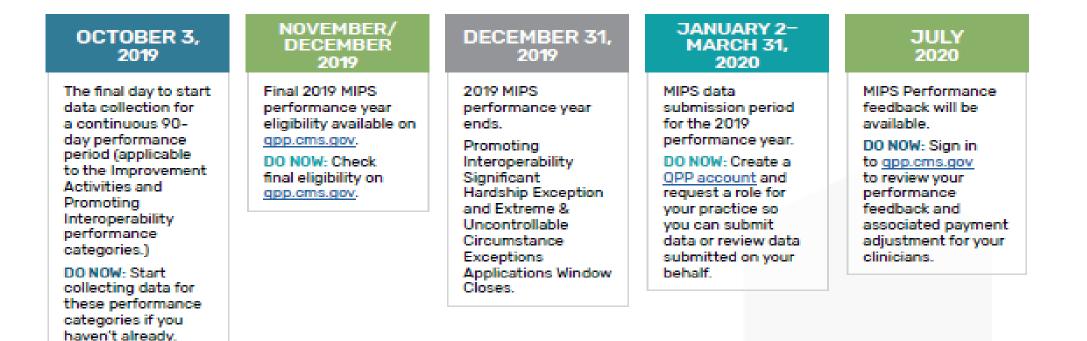
### Quality Payment

#### What are the important participation milestones for MIPS?

Participation and data submission deadlines for the 2019 performance year are included in the chart below. You can also visit the <u>Performance Year 2019 timeline</u> on <u>app.cms.gov</u>.

DECEMBER	JANUARY 1,	APRIL 4,	JUNE	JULY 1,
2018	2019	2019	2019	2019
Preliminary 2019 MIPS performance year eligibility available. DO NOW: Check preliminary eligibility on <u>app.cms.gov</u>	2019 MIPS performance year begins. DO NOW: Review collection types and available quality measures so you can start collecting quality data.	Registration period begins for the CMS Web Interface and the CAHPS for MIPS survey. DO NOW: Create a <u>QPP account</u> and request the Security Official role for your practice if you don't have QPP credentials and your group wants to register.	Promoting Interoperability Significant Hardship Exception and Extreme & Uncontrollable Circumstance Exceptions Applications Window Opens. DO NOW: Review information and FAQs about <u>exception</u> <u>applications</u> on the OPP website.	Registration deadline for the CMS Web Interface and CAHPS for MIPS survey. DO NOW: Complete your registration before 5 p.m. ET.

### Quality Payment



### Join and Advanced Alternative Payment Model (AAPM)

Not subject to MIPS reporting

5% "bonus" payment on Part B payments through 2024

0.75% payments adjustments after 2026 (vs. 0.25%)

Options for waivers (3-day SNF, Telemedicine, etc.)

Participate in an Advanced Alternative Payment Model



Some practices may choose to participate in an Advanced Alternative Payment Model in 2017

# **MSSP New Program Structure**

BASIC Track Level A	Level B	Level C	Level D	Level E	ENHANCED Track
40% sharing rate	40% sharing rate	50% sharing rate	50% sharing rate	50% sharing rate	75% sharing rate
Upside only	Upside only	1 <sup>st</sup> dollar losses at 30%, not to exceed 2% of revenue capped at 1% of BM	1 <sup>st</sup> dollar losses at 30%, not to exceed 4% of revenue capped at 2% of BM	1 <sup>st</sup> dollar losses at 30%, not to exceed 8% of FFS revenue capped at 4% of BM	1 <sup>st</sup> dollar losses 40- 75% and not to exceed 15% of BM
MIPS APM	MIPS APM	MIPS APM	MIPS APM	Advanced APM	Advanced APM

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\*Agreement Period 5 years

# **MSSP New Program Structure**

BASIC Track Level A	Level B	Level C	Level D	Level E	ENHANCED Track
40% sharing rate	40% sharing rate	50% sharing rate	50% sharing rate	50% sharing rate	75% sharing rate
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MIPS APM	MIPS APM	MIPS APM	MIPS APM	Advanced APM	Advanced APM

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\*Agreement Period 5 years

### Wrap-up

MACRA/Value-based payment is not going away

The rules will be quite fluid

Quality and cost will rule (just like Value-based Purchasing, and PQRS)

There will be winners and losers

Advanced Alternative Payment Models offer potential efficiencies





## Thank you!

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