

Healthy People, Healthy Communities  
Providing Better Care at Lower Cost

# MIPS Tips

Interoperability and the Exchange of Data — May 17, 2019

Presented by Comagine Health and Mountain-Pacific  
Quality Health



# Comagine Health

Qualis Health & HealthInsight  
have joined forces to do great things.

**Comagine**  
Health

Together, we're reimagining health care.



# Supporting You

Comagine Health and Mountain-Pacific Quality Health are providing support to practices as subcontractors to NRHI, the Network for Regional Healthcare Improvement.



# Slide Deck Available

- Today's slide deck and recording will be made available a few days following the event. Watch your email to be notified when they are available or visit <https://healthinsight.org/qpp#webinars> to find all past MIPS Tips and QPP webinar recordings.



# Acronym List

**ACI:** Advancing Care Information (now PI)

**ACO:** Accountable Care Organization

**AF:** Adjustment Factor

**AAPM:** Advanced Alternative Payment Model

**CAHPS:** Consumer Assessment of Healthcare Providers & Systems

**CMS:** Centers for Medicare & Medicaid Services

**CPC+:** Comprehensive Primary Care Plus

**EIDM:** Enterprise Identity Management (now HARP)

**EC:** Eligible Clinician

**EP:** Eligible Professional

**FFS:** Fee-for-Service

**GDP:** Gross Domestic Product

**HARP:** HCQIS Access Roles and Profiles

**IA:** Improvement Activities

**MACRA:** Medicare Access and CHIP Reauthorization Act of 2015

**MIPS:** Merit-based Incentive Payment System

**MSPB:** Medicare Spending per Beneficiary

**MSSP:** Medicare Shared Savings Program

**MU:** Meaningful Use (EHR Incentive Program)

**NPI:** National Provider Identifier

**PFS:** Medicare Part B Physician Fee Schedule

**PI:** Promoting Interoperability

**PQRS:** Physician Quality Reporting System

**QCDR:** Qualified Clinical Data Registry

**QIO:** Quality Improvement Organization

**QPP:** Quality Payment Program

**TPCC:** Total Per Capita Cost

**TIN:** Taxpayer Identification Number

**VM:** Value-Based Payment Modifier



- Did you submit MIPS for 2018?
  - Yes
  - No



- If so, did you submit Promoting Interoperability
  - Yes
  - No



# Overview: Promoting Interoperability



**25%**  
of final score



**Most  
changes**  
occurred to  
this category in  
Year 3



## **90-Day Reporting Period**

- Any 90-day reporting period within the Performance Year
- Last day to start is October 2
- If group reporting, 90-day period must be same for entire group





# Promoting Interoperability

## 2015 Edition CEHRT required

- Must be in place for chosen 90-day reporting period
- Must be certified to 2015 edition by last day of selected reporting period



# Promoting Interoperability: Scoring

- ✓ Scoring is now performance-based
  - 100 points with optional 10 points in bonuses
- ✓ Eliminated base, performance and bonus scores
- ✓ There are now four categories called “Objectives,” and each objective has measures



# Also Required for PI

## Attestation Requirements

- Must submit a “yes” to:
  - Prevention of Information Blocking Attestation
  - The ONC Direct Review Attestation
  - Security Risk Analysis Completion



# Also Required for PI

## Security Risk Analysis

- SRA requirements are the same as 2018
- Must be completed to earn a score for PI
  - No score attached to the SRA
  - Even if data for the other sections of PI is complete, without the SRA, the PI score is zero
  - Call Mark Norby at (307) 258-5322 to set up a time for a free consultation, or email [mnorby@Comagine.org](mailto:mnorby@Comagine.org).



# Poll

- What type of interoperability do you have? Pick all that apply:
  - HIE – Send
  - HIE - Receive
  - E-prescribing
  - Immunization Registry Reporting
  - Electronic Case Reporting
  - Public Health Registry Reporting
  - Electronic Reportable Laboratory Result Reporting
  - Syndromic Surveillance Reporting
  - Clinical Data Registry Reporting



# PI: Data Exchange

- **Electronic Prescribing**
  - E-prescribing - **10 pts**
  - **Bonus** Query of Prescription Drug Monitoring Drug Program – **5 pts**
  - **Bonus** Verify Opioid Treatment Agreement – **5 pts**
- **Health Information Exchange**
  - Support Electronic Referral Loops by Sending Health Information – **20pts**
  - Support electronic Referral Loops by Receiving and Incorporating Health Information – **20pts**



# PI: Data Exchange

- **Provider to Patient Exchange**
  - Provide Patients Electronic Access to Their Health Information – **40pts**
- **Public Health and Clinical Data Exchange**
  - Choose Two – **10pts** (reported with “yes” or “no” responses)
    - Immunization Registry Reporting
    - Electronic Case Reporting
    - Public Health Registry Reporting
    - Electronic Reportable Laboratory Result Reporting
    - Syndromic Surveillance Reporting
    - Clinical Data Registry Reporting



# Third-Party Intermediaries

Intermediaries can be:

- Qualified registry
- Qualified clinical data registry (QCDR)
- Health IT vendor that obtains data from a MIPS eligible clinician's CEHRT
- CMS-approved survey vendor.

Certain CMS-approved third-party intermediaries also provide feedback to clinicians throughout the year to support and drive improvement.





# Poll

- Did you file an exemption for PI?
  - Yes
  - No



# Hardship Exceptions

- 1 Must submit a PI Hardship Exception Application for review
- 2 If approved, PI will be zero; 25 percent will be reweighted to Quality category



# Hardship Exceptions



MIPS-eligible clinician is in small practice (15 or fewer clinicians)



MIPS-eligible clinician using decertified EHR technology



Lack of control over CEHRT availability



Insufficient internet connectivity



Extreme and uncontrollable circumstances



# PI Category Exclusions

- Automatic reweighting of PI category to Quality category
- Do not need to submit a PI Hardship Exception form
- Applied automatically when reporting individually
- If group reporting, the entire group must be exempt from PI or automatic reweighting status is revoked



# PI Category Exclusions

## Special Status Clinicians

- Hospital-based MIPS-eligible clinicians
- Physician assistants
- Nurse practitioners
- Clinical nurse specialists
- Certified registered nurse anesthetists
- Non-patient facing clinicians
- Ambulatory surgical center-based MIPS-eligible clinician



# PI Category Exclusions

## Newly Eligible Clinician Types


- Physical therapists
- Occupational therapists
- Clinical psychologists
- Speech-language pathologists
- Audiologists
- Registered dietitians or nutrition professional



# How to Ask a Question

You are viewing Cathy Nelson's screen View Options

## Questions



This material was prepared by HealthInsight, the Medicare Quality Innovation Network-Quality Improvement Organization for Nevada, New Mexico, Oregon and Utah, under contract with the Centers for Medicare & Medicaid Services (CMS), an agency of the U.S. Department of Health and Human Services. The contents presented do not necessarily reflect CMS policy. 11SOW-D1-XX-XX

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Quality Improvement

Leave Meeting

The image shows a Zoom meeting interface. The main content area displays a slide titled "Questions" with three overlapping speech bubbles containing question marks. A red arrow points from the bottom of the slide to a red circle around the chat icon in the Zoom toolbar. The toolbar also shows icons for participants (8), a bar chart, a green folder icon, and a microphone. On the right side, a vertical stack of video thumbnails shows participants: Paige Hoffman, Sharon Phelps, kim, a phone icon with number 18084406057, Cathy Nelson, and Natalya Seibel. At the bottom right, there is a "Leave Meeting" button and a green logo with a white speech bubble.

# Please Fill Out Our Evaluation

- An evaluation link for this session is currently being placed in the chat. Please take a few minutes before you leave the meeting today to fill out an evaluation and help us improve our offerings.





# Assessment

- Get customized support for your practice by filling out a short assessment
- Comagine Health/HealthInsight:  
<https://healthinsight.org/qpp-assessment>
- Mountain-Pacific:  
<http://mpqhf.com/QIO/qpp-enroll/>



# CMS Learning Modules

CMS has created several learning modules aimed at helping you understand and succeed in the QPP program. You can find those modules here: <https://learner.mnlms.com/Default.aspx>



# For More Information Contact a QPP Expert in Your State

## Mountain-Pacific Quality Health

Please contact us for assistance!

QualityPaymentHelp@mpqhf.org

<https://www.mpqhf.org/QIO/qpp-tools-resources/>

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# For More Information Contact a QPP Expert in Your State

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