

ACG GI Practice Toolbox

Merit-Based Incentive Payment System (MIPS)

AUTHOR:

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INTRODUCTION:

The MACRA law of 2015, which was passed with broad bipartisan support, repealed SGR and defined MIPS and APMs as two options in the Quality Payment Program. CMS released a final rule in October 2016 that defined how MIPS will be implemented.

TOPIC OVERVIEW:

MACRA combined 3 independent programs (PQRS, VBPM, and EHR) and added a new 4th component, Improvement Activities, into a new MIPS program for Medicare Part B payments to providers. MIPS does not apply to hospital reimbursement or ASC facility fees. MIPS involves 4 performance categories, the sum of which scores lead to a MIPS Composite Performance Score. These categories and their corresponding weight for 2017 include: Quality (60%), Cost (0%), Improvement Activities (15%), and Advancing Care Information (25%). CMS has defined specific criteria to be met within each of these categories, to be awarded credit toward the Composite Performance Score. Each year, CMS will set a Threshold Score. Clinicians will submit data toward their Composite Performance Score as individuals or as part of a group, with the same national provider number (NPI) and tax identification number (TIN). If the Composite Performance Score is greater than the CMS-defined Threshold Score, then the provider will receive either a neutral adjustment or a positive adjustment (bonus) from CMS, for the payment year, which will be two years after the performance year. The bonus is in a linear manner above the Threshold Score. If on the other hand, the Composite Performance Score is less than the CMS-defined Threshold Score, then the provider will receive a negative adjustment (penalty). MACRA requires MIPS to be budget neutral.



For 2017, defined by CMS as the MIPS Transition Year, CMS has allowed 4 options for MIPS participation. As long as clinicians submit some data, they will not be penalized with a negative adjustment (penalty) in 2019. Below is a summary of these 4 options:

Participation Options	Full Year	Partial Year	Test Pace	No Participation
Data Submission	Report for entire year	Report for 90-day period	Report some data	Report no data
Adjustment	Modest positive adjustment	Small positive adjustment	Neutral adjustment	Negative 4% payment adjustment

PRACTICAL SUGGESTIONS AND EXAMPLES FOR YOUR PRACTICE:

CMS allows third party vendors to act as intermediaries on behalf of clinicians, to submit data for MIPS performance categories. These include: EHR vendors, a qualified clinical data registry, a qualified registry, and CMS approved CAHPS vendors.

In order to participate in MIPS for performance year 2017 (payment year 2019) and receive some positive adjustment (bonus), you need to do the following for each of the 4 performance categories:

1. **Quality:** Report on 6 quality measures, including an outcome measure for a minimum of 90 continuous days.
2. **Cost:** No data submission is required, as this category will not be measured in 2017. (In the future, CMS will extract this information from claims-based data).
3. **Improvement activities:** Attest completion of up to 4 improvement activities for a minimum of 90 continuous days.
4. **Advancing Care Information:** Fulfill required 5 measures for a minimum of 90 continuous days. Also, choose up to 9 measures for a minimum of 90 continuous days. Lastly, choose bonus credit for this category.

Important note: The GI Quality Improvement Consortium, Ltd. (GIQuIC) Registry has been approved as a QCDR for reporting to the Merit-based Incentive Payment System (MIPS) for the 2017 reporting year. [Click here](#) to review and learn more about the various MIPS categories that participation in the GIQuIC QCDR will help satisfy, including the Quality, Improvement Activities, and potentially the Advancing Care performance categories.

Important deadlines for MIPS include the following:

1. October 2, 2017 – last day to begin submitting 90 continuous days’ worth of 2017 data
2. December 31, 2017 – Last day for 2017 data collection
3. March 31, 2018 – Deadline for submitting for CY 2017 MIPS data



RESOURCES:

1. <https://qpp.cms.gov/>
2. <https://qpp.cms.gov/learn/qpp>
3. <http://gi.org/national-affairs/macra/>
4. <http://giquic.gi.org/>

