Quality Payment

Performance Year 2019 Promoting Interoperability Performance Category Score for MIPS APM Participants

This fact sheet provides an overview and sample of the Promoting Interoperability (PI) performance category score calculation for MIPS eligible clinicians in the Merit-based Incentive Payment System (MIPS) Alternative Payment Models (APMs). MIPS eligible clinicians in MIPS APMs receive special scoring under the APM Scoring Standard. The calculated PI performance category score is generated from all scores of MIPS eligible clinicians participating in the APM Entity.

APM Scoring Standard

MIPS APMs hold their eligible clinicians accountable for the cost and quality of care provided to Medicare beneficiaries. To understand their MIPS participation, all eligible clinicians should check their participation status.

The APM Scoring Standard accounts for activities already required by the APM to reduce duplication of reporting and allow clinicians to focus on the goals of the APM. MIPS eligible clinicians in a MIPS APM participate in MIPS through their APM Entity and are scored under the APM scoring standard.

You can learn more about the APM scoring standard in our resource library.

Promoting Interoperability

The PI performance period is a minimum of any continuous 90-day period within the calendar year.

Each MIPS eligible clinician in an APM Entity receives the same PI performance category score, under the APM Scoring Standard. The PI performance category score is an average of the highest score attributed to each MIPS eligible clinician in the APM Entity based on their individual or group reporting. We designed scoring this way intentionally to encourage you to focus on measures that are most applicable to how you deliver care to patients instead of on measures that may not be as applicable to you. Our goal is to provide increased flexibility to you and enable you to focus more on patient care and health data exchange through interoperability.



We score each measure according to the scoring methodology established in rulemaking for the PI performance category. The measure performance rate calculated is based on the numerator and denominator submitted, except for the Public Health and Clinical Data Registry Reporting objective's measures as well as the Security Risk Analysis measure, which require "yes or no" submission. Each measure contributes to the clinician's total PI performance category score.

Eligibility Rules

APM Entities that are in MIPS APMs receive a PI performance category score that accounts for all MIPS eligible clinicians in the APM Entity. However, APM Entity groups below the Low Volume Threshold are excluded from MIPS and do not receive an APM Entity-level PI performance category score. When downloading the PI .CSV file, if you see the "Exempt" column is populated with "True," then that provider and his/her scores listed in the row did not contribute to the APM Entity Base Score.

Promoting Interoperability APM Entity Scoring Rules

APM Entities' scores are averages of the MIPS eligible clinicians' scores in the APM Entity. If a MIPS eligible clinician qualifies for a significant hardship or other type of exception for the PI performance category but chooses to submit data for the category as an individual or group, their data will be scored, and they will contribute to the rollup.

Participants in Shared Savings Program ACOs receive a score for all contributing eligible clinicians. Each score is used to calculate the overall APM Entity (ACO) PI performance category score.

PI Scoring Roll-Up Methodology for APM Entity Groups

- 1. We calculate the base scores of all MIPS eligible clinicians that are a part of the APM Entity.
- 2. We calculate the average of the MIPS eligible clinician base scores.
- 3. We assign the average of the MIPS eligible clinician scores as the **APM Entity Base Score**. This base score is inclusive of the PI Base Score and the PI performance score.
- 4. We add together all **Bonus Points** from the MIPS eligible clinicians in the APM Entity.
- 5. We assign the **total of Bonus Points** to the APM Entity, not to exceed 10 points in total.
- 6. The **APM Entity Base Score** is then added to the **total of Bonus Points** (not to exceed 10 points), which creates the **APM Entity Score** for the APM Entity.

APM Entity Group Scoring Methodology Example

	Example APM Entity PI, Base, and Bonus Scores Including Exempt Status								
APM Entity	TIN	NPI	First Name	Last Name	PI Score	Base Score	Bonus	Exempt	Performance Year
Entity ID of APM	Taxpayer ID Number	National Provider ID	Clinician First Name	Clinician Last Name	PI Score for the APM and Each MIPS Eligible Clinician	All PI Measures that are not Bonus Measures	Based on Additional Earned Bonus Points	Excepted from PI Category or Not MIPS Eligible	2019
APM_ 101	1	1	John	Doe	100	100	5	FALSE	2019
APM_ 101	1	2	James	Johnson	100	90	0	FALSE	2019
APM_ 101	1	3	Jane	Smith	0	0	0	TRUE	2019
APM_ 101	2	4	Joane	Jones	100	0	0	FALSE	2019
APM_ 101	2	5	Sam	Williams	100	100	5	FALSE	2019
APM_ 101	2	6	John	Miller	100	75	0	FALSE	2019
APM_ 101	3	7	Lesley	Wilson	100	100	0	FALSE	2019
APM_ 101	3	8	John	Brown	100	75	0	FALSE	2019
APM_ 101	3	9	Mindy	Davis	0	0	0	TRUE	2019

Example APM Entity Promoting Interoperability Calculation					
Column	Score	Total			
Base ¹	100 + 90 + 0 + 100 + 75 + 100 + 75 7	77.1428571			
Bonus	5+ 5	10			
PI Score	77.1428 + 10	87.14			

¹ In the CSV download the "Base" column reflects MIPS eligible clinician's PI base score + their performance score

Base Score Measures

The base score measures are the PI measures that MIPS eligible clinicians are required to report. The base score measures are separate from the bonus score measures.

	STANDARD			
Measure ID	Exclusions	Reporting Category		
PI_INFBLO_1	N/A	Pre-Attestation		
PI_ONCDIR_1	N/A	Pre-Attestation		
PI_ONCACB_1	N/A	Pre-Attestation		
PI_EP_1	PI_LVPP_1	Base		
PI_PPHI_1	N/A	Base		
PI_PEA_1	N/A	Base		
PI_HIE_1	PI_LVOTC_1	Base		
PI_HIE_4 *	PI_LVITC_2 PI_CUITC_1	Base		
PI_PHCDRR_1 with PI_PHCDRR_1_MULTI	PI_PHCDRR_1_EX_1 PI_PHCDRR_1_EX_2 PI_PHCDRR_1_EX_3	Base		
PI_PHCDRR_2 with PI_PHCDRR_2_MULTI	PI_PHCDRR_2_EX_1 PI_PHCDRR_2_EX_2 PI_PHCDRR_2_EX_3	Base		
PI_PHCDRR_3 with PI_PHCDRR_3_MULTI	PI_PHCDRR_3_EX_1 PI_PHCDRR_3_EX_2 PI_PHCDRR_3_EX_3	Base		
PI_PHCDRR_4 with PI_PHCDRR_4_MULTI	PI_PHCDRR_4_EX_1 PI_PHCDRR_4_EX_2 PI_PHCDRR_4_EX_3	Base		
PI_PHCDRR_5 with PI_PHCDRR_5_MULTI	PI_PHCDRR_5_EX_1 PI_PHCDRR_5_EX_2 PI_PHCDRR_5_EX_3	Base		

Bonus Score

The bonus score measures are separate from the base score measures. As a reminder, the bonus score may not exceed 10 points in total.

a. Prescription Drug Monitoring Program and Opioid Treatment Agreement

Standard Measures	Points	
PI_EP_2	5	
PI_EP_3	5	

The bonuses are aggregated at the TIN level and added to the PI APM Entity score after the calculation with a cap of 10. With this addition, the PI APM Entity Score may not exceed 100 points.