



COVID-19 Vaccination by Clinicians Measure Specifications (Draft)

Measure Steward: CMS

NOTE: The information on this page and the next page pertains to the Request for Information included in the [CY 2022 Physician Fee Schedule \(PFS\) proposed rule](#) that was displayed in the Federal Register on July 13, 2021. In section IV.A.3.d.(1)(f) of the CY 2022 PFS proposed rule, we outline a Request for Information regarding the draft COVID-19 Vaccination by Clinicians measure specifications. In Table Group AA of Appendix 1 of the CY 2022 PFS proposed rule, we describe the COVID-19 Vaccination by Clinicians measure. Please note that this quality measure is NOT being proposed for inclusion within the Merit-based Incentive Payment System (MIPS), but included in CY 2022 PFS proposed rule as part of the Request for Information.

As outlined in the CY 2022 PFS proposed rule, we are seeking public comment on these draft COVID-19 Vaccination by Clinicians measure specifications. Specifically, we are seeking feedback on the following questions.

- Should the measure assess whether or not patients completed a COVID-19 vaccination series to capture provision of effective clinical care and why?
- Given that there are differences in the age ranges for patients eligible to receive the various COVID-19 vaccinations (Moderna and Janssen COVID-19 vaccines are authorized for patients ages 18 years and older; Pfizer-BioNTech COVID-19 vaccine is authorized for patients ages 12 and older; and future COVID-19 vaccines may be approved for other age ranges that are implemented after the publication of the CY 2022 PFS proposed rule), is 18 years and older an appropriate initial age threshold for this measure?
- Given the current COVID-19 public health emergency and the intent of the measure, should this measure be mandatory for reporting in a future year?
- If this measure would be mandated as a required measure for reporting purposes under MIPS, what issues or concerns would need to be considered and/or mitigated regarding the implementation of the measure in a future year?
- What are the potential unintended consequences associated with the potential future implementation of the measure as specified in Table Group AA of Appendix 1 of CY 2022 PFS proposed rule and applicable measure specifications?
- What are the feasibility challenges and barriers to implementing the measure?

In order to understand, account for, and address challenges that may be experienced from one MIPS performance period to the next MIPS performance period, the following questions are for hypothetical purposes.

- What are the potential options and/or recommendations that we should consider to address and/or mitigate the feasibility challenges and barriers to be experienced during the 2022 MIPS performance period that could be improved upon for the 2023 MIPS performance period?
- If this measure would be mandated, how would the collection of the measure data be useful after the 2023 MIPS performance period?

To submit formal comments that are part of the public record, select one of the following three options:

1. **Electronic.** You may submit electronic comments on this regulation to <http://www.regulations.gov>. Follow the "Submit a comment" instructions.

2. **Regular mail.** You may mail written comments to the following address ONLY: Centers for Medicare & Medicaid Services, Department of Health and Human Services, Attention: CMS-1751-P, P.O. Box 8016, Baltimore, MD 21244-8016.
 - a. Please allow sufficient time for mailed comments to be received before the close of the comment period.
3. **Express or overnight mail.** You may send written comments to the following address ONLY: Centers for Medicare & Medicaid Services, Department of Health and Human Services, Attention: CMS-1751-P, Mail Stop C4-26-05, 7500 Security Boulevard, Baltimore, MD 21244-1850.

Quality ID #TBD: COVID-19 Vaccination by Clinicians
– National Quality Strategy Domain: Wellness and Prevention
– Meaningful Measure Area: Preventive Care

COLLECTION TYPE:

MIPS Clinical Quality Measures (CQMS)

MEASURE TYPE:

Process

DESCRIPTION:

Percentage of patients aged 18 years and older seen for a visit during the measurement period who have ever completed or reported having ever completed a Coronavirus Disease 2019 (COVID-19) vaccination series.

INSTRUCTIONS:

This measure is to be submitted a minimum of **once per performance period** for patients seen during the performance period. This measure is intended to measure the percentage of patients aged 18 years and older who have ever completed a COVID-19 vaccination series, either from the submitting Merit-based Incentive Payment System (MIPS) eligible clinician or from an alternate provider. There is no diagnosis associated with this measure. This measure may be submitted by MIPS eligible clinicians who perform the quality actions described in the measure based on the services provided and the measure-specific denominator coding.

Note: Patient encounters for this measure conducted via telehealth (e.g., encounters coded with GQ, GT, 95, or POS 02 modifiers) are allowable.

MEASURE SUBMISSION TYPE:

Measure data may be submitted by individual MIPS eligible clinicians, groups, or third party intermediaries. The listed denominator criteria are used to identify the intended patient population. The numerator options included in this specification are used to submit the quality actions as allowed by the measure. The quality-data codes listed do not need to be submitted by MIPS eligible clinicians, groups, or third party intermediaries that utilize this modality for submissions; however, these codes may be submitted for those third party intermediaries that utilize Medicare Part B claims data. For more information regarding Application Programming Interface (API), please refer to the Quality Payment Program (QPP) website.

DENOMINATOR:

All patients aged 18 years and older seen for a visit during the measurement period.

- **Denominator Criteria (Eligible Cases):**
 - Patients aged ≥ 18 years on date of encounter
AND
 - **Patient encounter during the year (CPT or HCPCS):** Codes to be determined
AND NOT
- **DENOMINATOR EXCLUSIONS:**

- **Patient received hospice services any time during the measurement period:**
Codes to be determined

NUMERATOR:

Patients who have ever completed or reported having ever completed a COVID-19 vaccination series.

- **Numerator Instruction:**

- The numerator for this measure can be met by submitting either administration of a complete COVID-19 vaccination series or that the patient reported having ever completed a COVID-19 vaccination series. Completion of a vaccination series indicates completion of the vaccine dose regimen as recommended by the specific vaccine product's manufacturer. If the performance of the numerator is not met, a MIPS eligible clinician can submit a valid denominator exception for having not administered a complete COVID-19 vaccination series. For MIPS eligible clinicians submitting a denominator exception for this measure, there should be a clear rationale and documented reason for not administering a complete COVID-19 vaccination series if the patient did not indicate previous receipt. These exceptions are patient contraindication or vaccine not available.
- **NUMERATOR NOTE:** Denominator Exception(s) are determined at the time of the denominator eligible encounter.

- **Numerator Options:**

	Performance Met:	Complete COVID-19 vaccination series administered or previously received (X)
OR	Denominator Exceptions:	Complete COVID-19 vaccination series was not administered because patient contraindication documented by clinician (X)
OR	Denominator Exceptions:	Complete COVID-19 vaccination series was not administered because vaccine not available documented by clinician (X)
OR	Performance Not Met:	Complete COVID-19 vaccination series was not administered, reason not given (X)

RATIONALE: As of July 7, 2021, the Centers for Disease Control and Prevention (CDC) reported 33,582,352 cases of COVID-19 and 603,656 deaths.¹ Widespread vaccination to prevent COVID-19 will be critically important to stemming the morbidity and mortality caused by this disease.

CLINICAL RECOMMENDATION STATEMENTS:

On December 19, 2020, the Advisory Committee on Immunization Practice (ACIP) made an interim recommendation on the use of the Moderna COVID-19 vaccine for people ages 18 and

¹ [CDC COVID Data Tracker](#)

older. Earlier that month, on December 12, ACIP also granted use of the Pfizer-BioNTech COVID-19 vaccine for people ages 16 and older, as an interim recommendation. On May 12, 2021, ACIP made an interim recommendation for use of the Pfizer-BioNTech COVID-19 vaccine in adolescents aged 12–15 years for the prevention of COVID-19. The benefits of both vaccines were classified as high certainty (Type 1) based on the GRADE evidence assessment.

On February 28, 2021, ACIP issued an interim recommendation for use of the Janssen COVID-19 vaccine in persons aged ≥ 18 years for the prevention of COVID-19. On April 23, 2021, after a pause in use and further review of the Janssen COVID-19 vaccine, ACIP concluded that the benefits of resuming Janssen COVID-19 vaccination among persons aged ≥ 18 years outweighed the risks and reaffirmed its interim recommendation, which includes a new warning for rare clotting events among women aged 18–49 years. The benefits of the vaccine were classified as moderate certainty (Type 2) based on the GRADE evidence assessment.

Future versions of the measure will be updated as more evidence and guidelines emerge.

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