

The Merit-based Incentive Payment System: Annual Call for Promoting Interoperability Performance Category Measures and Improvement Activities
February 5, 2019

Hello, everyone. Thank you for joining today's CMS Merit-based Incentive Payment System Call for Promoting Interoperability Measures and Improvement Activities Webinar. CMS will provide an overview of the Annual Call for Measures and Activities process for the MIPS Promoting Interoperability and Improvement Activities performance categories. After the presentation, CMS will take your questions. Please note, a separate webinar will be scheduled at a later date to provide information on the Annual Call for Quality Measures. And now I'll turn the call over the Kati Moore, Health Insurance Specialist from CMS. Please go ahead.

Great. Thank you. Well, good afternoon, everybody. I hope you're all enjoying some early Spring weather like we are the in the East Coast, Baltimore area today. So, we are going to be talking about the MIPS Annual Call for Promoting Interoperability performance category measures and Improvement Activities today. So, some of you may be wondering if we're going to be talking more in-depth about our policies related to Promoting Interoperability performance category or our Improvement Activities performance category. So, today's call is really specific to just this Annual Call for the PI measures and Improvement Activities. So, we have a ton of great resources available on our QPP Resource Library, if you're looking for more policy-specific information, but today we're really going to try and focus on the Call and give you all the details you need if you're looking to submit some measures or activities for consideration.

Next, we can actually hop over to Slide 3. All right, so, here's just a quick run of show -- what we're going to be talking about today. I'll go through a few slides that just give really quick super high-level overview of the Quality Payment Program and specifically an overview the Merit-based Incentive Payment System. So, MIPS. And then I will pass it over to my colleagues that are on the phone to go over just an overview of the Call for Promoting Interoperability Measures and Improvement Activities and give you a lot more specific details on those two specific things, and then we'll just quickly go over a few resources that are available for everyone, and then we do have a couple of slides at the end of appendices, but those are really just for reference. We won't be going over those policy slides in detail.

All right, we can hop to the next slide. And one more, please. Okay, great. Thanks. So, this just kind of lays out really briefly what in the world is the Quality Payment Program, and I'm going to make an assumption that the majority of people on this call know what the Quality Payment Program is and MIPS are in general, but we'll just touch very high-level on what these are. So, the Quality Payment Program. So, the Medicare Access and CHIP Reauthorization Act of 2015, which we refer to as MACRA, ended the sustainable growth rate formula, which would have resulted in a significant cut to payment rates for clinicians participating in Medicare. The bylaw MACRA requires CMS to implement an incentive program, which we refer to as the Quality Payment Program, or QPP. So, within QPP, there are two participation tracks for clinicians. So, the first we have here is MIPS, so the Merit-based Incentive Payment System, which if you're in this and you're an eligible clinician for this track of the program, you are subject to a performance-based payment adjustment through MIPS. And there are a lot of resources on our website, again, that give you more details on -- Who's

eligible for this program? Does it include me? Does it not include me? So, I encourage everyone to go ahead and check that out, as well as our Participation Lookup Tool that is also on QPP.CMS.gov. That allows you to put in a clinician's National Provider Identifier, their NPI, and it gives you really great instant feedback on who's eligible for this program and where you can go for more help in participating successfully. So, then our second track we have in the program is our Advanced APMs, our Alternative Payment Models. If you decide to take part in an Advanced APM, you may earn a Medicare incentive payment for sufficiently participating in your given innovative payment model. Again, there's a lot more resources on that specific track of the program on our website.

Next slide. And one more. Great, thanks. So, here's just a very brief quick overview of "What is the Merit-based Incentive Payment System?" So, MIPS is made up of four different distinct performance categories. The first is Quality, then there's Promoting Interoperability, Cost, and Improvement Activities. And in 2019, you receive a score for all four of them now. So, as you'll see on the slide, the Quality performance category is worth 45% of your MIPS final score, Promoting Interoperability is worth 25% of your MIPS final score, Cost will be worth 15%, and Improvement Activities is also worth 15%. And these are all your weighted scores for the 2019 performance period for MIPS, and they all equal out to 100%, which is your MIPS final score. And, as you'll see on the slide, MIPS eligible clinicians -- we're really trying to move towards a performance-based payment system, which is why MIPS was created. It gives clinicians a lot of different flexibilities on choosing the measures and activities that best describe or fit how your specific practice or your clinician practices. So, it gives you tons of different flexibility in this program. And if you're interested more on how all this scoring works, for more details, there's definitely a scoring guide and different resources on our library that you can go and check out.

Next slide, please. Okay, with that, I'm think I'm going to turn it over to my colleague Jessica Wright.

Hi. Thank you, Kati. As Kati said, my name is Jessica Wright, and I'm a Nurse Consultant in the division of Health Information Technology. I want to thank you all for joining us today to learn about the Annual Call for Measures for the Promoting Interoperability Performance Category and Improvement Activities. I'll begin by focusing on the Promoting Interoperability Performance Category Call for Measures.

Please advance to slide 9. We really encourage and value the Annual Call for Measures process because it allows our stakeholders, which includes healthcare providers, professional associations, and healthcare organizations to submit recommendations for future measures, which help shape the QPP performance categories. As mentioned earlier, on today's call, we'll be focusing on the Promoting Interoperability Performance Category and the Improvement Activities Category Annual Call for Measures. The Quality performance category will be reviewed in a separate webinar.

Please advance to slide 10. The annual list of Promoting Interoperability performance category measures and Improvement Activities is published in the Federal Register no later than November 1st of the year prior to the first day of a performance period. For example, the MIPS Promoting Interoperability Performance Category Measures and Improvement Activities for 2020 will be posted by November 1st of 2019. The final measures and

activities will be available on the Quality Payment Program Resource Library at qpp.cms.gov.

Next slide, please. For this year's Annual Call for Measures, CMS is particularly interested in adding measures to the Promoting Interoperability performance category that continue to advance the use of certified Electronic Health Record Technology, or CEHRT, using the 2015 Edition Certification Standards and Criteria. We are also particularly focused on measures that promote interoperability in the exchange of health information while promoting patient access to their health information. We continue our interest in measures that reduce administrative burden and clinician burden through measures that improve program efficiency, effectiveness, and flexibility, and, in addition, we are continually interested in aligning with MIPS Improvement Activities and Quality performance category. We would like to note that the submission period opened on February 1, 2019 and will continue through July 1, 2019.

Next slide. When submitting a measure for consideration, we ask that you complete the designated submission form and submit it to the e-mail address shown on the screen, which is CMSCallForPIMeasure@gdit.com. The form must be completed in its entirety, including the measure description and program relevance, the measure type, if applicable, examples of measure types; include if the measure is an outcome measure, process measure, patient safety measure, et cetera; the reporting requirement; such as the numerator and denominator or the Yes/No reporting statement for the measure; and any applicable exclusion criteria, and lastly, the CEHRT functionalities utilized for the measure, if applicable. Please note that incomplete forms will not be considered. We will review and evaluate measure submissions for applicability to the program and feasibility.

Next slide, please. We recommend prior to the submission of a measure for consideration that submitters review previous years' specification sheets for the Promoting Interoperability performance category, which can be found on the Resource Library. And, also, we feel that reviewing these materials will help to avoid duplication of measures and also serve as the resource for the criteria of what's required. On the screen currently is a screenshot of the first page of the submission form for the Promoting Interoperability Performance Category Call for Measures. We do want to mention that the application remains basically the same as it did in previous years. We want to clarify that previous-year submissions will not carry over to this year's Call for Measures. Therefore, if you would like to have the measure that you previously submitted looked at again, you would need to resubmit it using this year's application. Again, the fact sheet and the submission form can be found on the QPP library resource webpage of the QPP website and is located under the 2019 Resources link found under General Information. I would now like to turn the presentation over to Angela Foster for the Improvement Activities portion of the webinar.

Thank you, Jessica. Hi, everyone. Thanks for joining us this afternoon. I'm Angela Foster, the Improvement Activities Lead here at CMS, and I'll be going over what we are looking for in the Call for Improvement Activities for our 2019 Call. Here on this slide, you can take a look at the following criteria that we will be considering when we're looking at whether or not to include your proposal for an Improvement Activity into the existing inventory. You can see we've got a pretty robust list here, such as relevance to an existing Improvement Activity subcategory, importance of an activity towards achieving improved beneficiary health outcomes. We're also

looking for the importance of an activity that could lead to improvement in practice, to reduce healthcare disparities. We need activities that are aligned with patient-centered medical homes, activities that focus on meaningful actions from the person and family's point of view. We would also like to receive activities that would support the patient's family or personal caregiver, and activities that are representative of activities that multiple individual MIPS eligible clinicians or groups could perform, and we give the example here of primary care or specialty care. We also need activities that are feasible to implement, recognizing the importance in minimizing burden, especially for small practices, practices in rural areas, or in areas designated as geographic HPSAs by HRSA. We need activities with evidence that supports that an activity has a high probability of contributing to improved beneficiary health outcomes, and we're also looking for submissions that potentially include a public health emergency as determined by the Secretary, and we also need to be able to validate the criteria. And you'll note that the last two that I read are new submission criteria for submissions made in Calendar Year 2019, which would be potentially be included in future years.

Advance to slide 15, please. It's also important to please review the existing Improvement Activities inventory to be sure that you do not duplicate existing activities. We will not consider activities that are duplicates. In some instances, we have taken proposals that were similar to existing Improvement Activities and incorporated them into those existing activities, but straight duplicates most likely will not be considered. So please carefully review that list and be sure that what you are submitting is a new idea. And, also, just note that when we say that we want to ensure that the proposed activity is feasible to implement by others, we mean that we're looking for activities that are widely applicable, or, as I said earlier, are representative of activities that multiple individual MIPS eligible clinicians or groups could perform. And, also, I just want to point out that the submission period is now open. So, you can begin sending in your submissions to us.

Advance to slide 16, please. Activities proposed for inclusion should be sent using the Improvement Activities submission form, which you'll see an example of shortly, to the website noted here. It is CMSCallforActivities@abtassoc.com. All communication regarding Improvement Activities proposals, including any follow-up questions that we might have for submitters and determinations will come from this e-mail address, and I will have to ask folks to just be mindful of this, please, to submit your questions, any questions that you may have to this e-mail address. As much as I like hearing from folks, I do receive e-mails from people, and I usually have to reroute them to this e-mail address because we need to keep a record, and, for tracking purposes, all questions and inquiries need to go through this particular e-mail address. You can rest assured that the IA team does review and respond to these e-mails. So, we will see them, they will be seen.

Slide 17, please. Here we're explaining our timeline for submission. We've opened up the submission period. It's lasting until July 1st of this year, and anything that is submitted between now and July 1st will be considered for inclusion in the Quality Payment Program Year 5, beginning January 1, 2021. Any proposals submitted after July 1, 2019, would be considered for inclusion in future years.

Slide 18. Here we've got the top portion of the copy of our submission form template that shows everything that we're looking for. I ask that you please pay attention to the directions and note that all fields must be completed for consideration. Provide as much information and documentation as possible. Be clear about what the activity entails and what will be required. It's extremely difficult for us to evaluate proposals that are missing information and leave us guessing as to the submitter's intent. We do try to reach back out to submitters when we have questions, but we can't always guarantee that time will permit this practice. Also, if you intend to propose a program or an activity, please note that only existing programs will be considered. We will not approve proposals for programs that will be implemented at a future date. Experience has shown us that sometimes circumstances can change, and while we understand that there are situations that may cause a program's launch to be delayed, you must recognize the frustration eligible clinicians feel when they want to select an activity only to find that the program is not up and running yet. So please be mindful of that when you are thinking about submitting a proposal that includes a program.

Slide 19, please. This is the other portion of the submission form. It shows here that we would like to have an idea of what proposed subcategory your proposal would fit under and then also an explanation for how we would validate that activity. So, here's where you would indicate your supporting documentation, links to publications or websites, and that sort of thing.

Slide 20, please. And this is the bottom portion of the form. Again, showing what type of documentation you would expect for this activity to use as proof that the activity was completed is important for us. Also, we would like to know what you estimate the level of effort to be for the activities. That will help us to be able to determine the weighting for the activity.

Slide 21, please. Now you will be able to use a different portion of the form to submit modifications to us. If you feel that any of our existing Improvement Activities should be modified in some way, you can fill out this portion of the form, and it will be very important to include a rationale explaining why you believe the Improvement Activity should be modified. Again, the more information you can provide, the better, because it makes it easier for us to evaluate and determine whether the modification should be accepted or not. And we can advance to slide 22, and I will turn it back over to Ketchum, I believe.

Actually, it's Kati. I'm going to hop in real quick.

Oh! Thanks, Kati. Sorry.

No worries. So, this -- yep, this slide just lists out where to go for available resources. So, as we mentioned, there's a 2019 Call for Measures and Activities Toolkit available on the QPP Resource Library at qpp.cms.gov. So, in this toolkit right now, we have an overview of the Call for PI Measures and Improvement Activities, a fact sheet available, along with the submission form for Improvement Activities that Angela just went through, and then the PI submission form that Jessica covered, as well, are included in there. And as we mentioned earlier, later in the Spring, we'll be having a separate webinar and more information available about our Call for Quality Measures. So, we'll be adding to this toolkit all of our Quality information when that is available. But if you have any specific questions about the submission process for Call for Improvement Activities and PI Measure

submissions, please direct the Call-specific questions to those e-mail boxes you see on the screen, and then just for any general programmatic questions you might have about QPP, you'll see our QPP service center contact information here with our e-mail and phone number. So, please direct any general questions, they're really helpful, they're there to help, and they'll also be able to connect clinicians with our free technical assistance that's available, if that would be helpful. So, contact our service center to get connected with the right folks there. And then, I think, now we'll turn back over to Ketchum to see if we have any Q&A we can help answer while we have more time here.

Great. Thanks, Katie. So, if we could go to the next slide. So, now we will start this Q&A session portion of the webinar. To ask a question, please submit it through the Q&A box, and, again, please note that we will not be answering any questions about 2018 or 2019 participation in MIPS. We will only be able to answer those questions related to the Call for Measures and Activities. So, our first question here says, "Does CMS want a numerator/denominator measures or attestation measures?"

Hi, this is Jessica. So, I'm assuming that's for the Promoting Interoperability performance category, and we are open to both numerator and denominator and Yes/No attestation statements.

Great. Thank you. Our next question says -- Let's see. "Is there a process for maintaining Improvement Activities, that is, after it has been accepted into the program, are there requirements to continue to keep it in the program in the following years? This would be similar to maintenance work required by measure stewards for the Quality component."

That would actually really be dependent on the activity that's submitted. So, if you're submitting a program, for instance, then we would need that program to continue to be running for the performance year set. It's a part of the inventory. If it's a program that's going to end, we would need that communication back to us so that we would know that and be able to propose to remove that activity from the inventory. There are some improvement activities on the current inventory that include some modules that are updated and added to periodically, so things like that would have been maintained over the course of the performance year, but as far as a requirement for maintaining the improvement activity, like a standard improvement activity, there is no requirement that you have to maintain it.

Great. Thank you. This next question is -- "Are there options to submit modifications or thoughts on existing PI Measures similar to what was shown on the bottom portion for the IA modifications?"

Yes. I mean, it would still need to be submitted through this process and have the same information filled out on the submission form, but we're certainly open to that.

Great. Thank you. Our next question says -- "Is CMS interested in QCDR-based Improvement Activities?"

We're interested in any and all proposals that, again, speak to the criteria that we have listed and also that are completely filled out and no fields are missing and provide as much information as possible. So, we will review and evaluate and consider any proposal that comes into us.

Great. Thank you. And this next question says -- "You mentioned that PIs from previous years will carry over. Will already approved IAs, including subcategories, carry over unless proposed for removal?"

They already do carry over. So, we have removed an activity that we found was a duplicate, but everything has carried over, and there is no immediate plan to remove what's in the current inventory. So, something that was proposed and accepted in 2018 is a part of the 2019 inventory at this time.

Thank you. And our next question is -- "What if you're submitting measures that have reached 100% improvement? Should you pick new measures?"

I'm guessing that you're referring to topped-out measures. For the Improvement Activities, we don't have topped-out activities, so to speak, because Improvement Activities are not measures. I just want to be clear on that.

Great. Thank you. And just a reminder to everyone to, please, if you have any questions about the Call for Measures or Activities, please do submit those to the Q&A box now. We are about running out of relevant questions, and so we'll just stand by and see if anyone has any other questions for us.

I'll just make a note here for folks to give you an idea, since we talk about in the submission form that I referenced earlier that we need you to include documentation needed to perform the activity and we need to be able to validate the activity. You can take a look on the QPP Resource Library page to see the Improvement Activities validation criteria. If you take a look at that, it gives you the validation criteria per improvement activity to give you an idea of the sorts of things that we're looking for there when you begin thinking about how to construct your proposal. The validation and the documentation portion is just as important as your description of the activity and the other elements on the form.

Great. And it looks like we did just get one question in. It says -- "Do you prefer for specific IAs supported by a product to be submitted as a subcategory activity or to assume it fits within an existing category?"

Can you read that again?

Yes. Yeah. So, the question says -- "Do you prefer for specific IAs supported by a product to be submitted as a subcategory activity or to assume it fits within an existing category?"

On the form, you would pick which subcategory you feel the activity falls under. So, I'm not sure that I'm completely following this question.

Okay, so, we can go ahead and move on to the next question. It says -- "Do you accept letters of support for IA submissions from organizations other than the activity sponsor?"

You can send in whatever documentation you feel is pertinent to the activity. I don't know that letters of support are going to sway a decision one way or another, but if you can provide me the high-level summary of that information, that would be helpful. We're not looking for tons and tons of attachments with the submissions. We want for you to provide as much information as you can, but we also will hope that what you provide will be concise because we do go through several levels of review, and a lot of eyes

look at these things, and we try to get through it as quickly as we can but also making sure that we're really taking the time to thoroughly evaluate. So send us the information that really is pertinent to the activity. That will help us to render a decision.

Great. Thank you. This next question is -- "Where is the criteria explained for each activity that shows the steps needed to take to support each improvement activity?"

So, that's what I just referenced in the validation criteria that you can find in the QPP Resource Library page, and I recommend that before you submit your activities that you do consult the Resource Library page to look at the list of existing Improvement Activities and to also look at the validation criteria because that gives you an idea of the documentation, as I mentioned before, that we are looking for and the validation that we're looking for. It will really give you a better sense of what to propose.

Great. Thank you. And let's see. I'm looking at the questions here, and this person says -- "Most Improvement Activities come across as vague. Are there plans to provide more resources in the future on IAs or to expand on them with examples?"

So, this is a policy question. We're focusing this particular webinar on the Call for Improvement Activities, and if you're asking from the standpoint of whether you should construct your proposal in a vague way, we do try to position the activities in a way that they're broad and applicable for a wide variety of eligible clinicians to be able to implement and attest to. So, keeping that in mind, that's really the best way I can answer that in the frame of what this webinar is what we're here for today.

Great. Thank you. And it looks like we don't have any more questions at this time, so we'll just stand by and please do send us your questions on the Call for Measures and Activities if you have any.

Okay, well, it looks like we aren't getting any more questions in. Do we want to move to wrap-up, or give it another second?

Yeah, so we can just take a last call for questions. So if you do have a question, please do send it in now. Otherwise, we will wrap this up. And it does look like we did get a question in. It says -- "We are a third-party IT vendor. Can we propose for new IA or PI measures?"

Yes, anyone can propose, so yes, that's perfectly acceptable. I see someone has a question that says, "What are sub-Improvement Activities, and how do they relate to Improvement Activities?" I'm not sure what you mean by this. We have subcategories within the Improvement Activities performance category, and that's how the Improvement Activities have been grouped, by statute. So, subcategories include things like expanded practice access, care coordination, things like that. There are eight of those. So, you can find information on that on the QPP Resource Library page. But as far as sub-Improvement Activities, we don't have actual sub-Improvement Activities. Unless you're referring to the example that we added within the validation criteria. And what we did with those, I referenced that a little bit earlier when I was stating that some proposals were similar to existing Improvement Activities so we included those proposals as examples of ways that you could meet that particular Improvement Activity. So, you can find that information in the Validation Criteria. Usually, you'll know that that's one that we've

included because it'll say something like, "Such as..." and then it will reference what the actual activity could be.

Okay, and then another question -- "What is the drop deadline for submitting activities or measures?"

For Improvement Activities, it's July 1, 2019.

And that's the same with the Promoting Interoperability performance category measure submissions.

Great. Thank you. And I'm not seeing any other questions in our queue. So, I guess we can wrap it up. And if we weren't able to answer your question, please do feel free to contact the Quality Payment Program service center or those e-mails for the Activities and Measures submission. If we can go to the next slide, you'll see those listed there again, and we also sent those out as an announcement earlier in the webinar. And additionally, please note that when we post these slides to the QPP webinar library, you will find a brief appendix at the end that Katie mentioned earlier, and so that will have more information on these two performance categories. Thank you.

Thank you. This concludes today's conference. You may now disconnect. Speakers, please hold the line.