ANSWERS TO QUESTIONS ABOUT THE SGR REPEAL BILL’S IMPACT ON PQRS AND MEANINGFUL USE

As a follow-up to the 032615 News Blast: Medicare Physician Fee Schedule 21% Cut Looming regarding the Medicare Access and CHIP Reauthorization Act of 2015 (H.R. 2) and SGR Repeal, summarized below are eight key points of the H.R. 2 bill that have a significant impact on other reporting programs if the “SGR repeal” bill gets approved by the Senate this week.

The bill, Medicare Access and CHIP Reauthorization Act of 2015 (H.R. 2), consolidates PQRS, the electronic health record (EHR) meaningful use program and the value-based modifier (VBM) program into one reporting system known as the Merit-Based Incentive Payment System (MIPS). MIPS won’t begin immediately, but it’s worth addressing eight key points.

1. **What are the components of the MIPS program?**
   The bill consolidates three existing incentive programs into one and rewards or penalizes physicians based on an overall composite score. The three programs being bundled into the overarching structure are PQRS, meaningful use and the VBM. In addition, the bill introduces a fourth component called “clinical practice improvement activities” as part of the MIPS program. The bill doesn’t cite the exact details, but states that the clinical practice improvement program “gives credit to professionals working to improve their practice” and also “facilitates future participation in APMs” (Advanced Practice Models).

2. **Who’s eligible for MIPS?**
   MIPS reporting system applies to a wide range of professionals, including “doctors of medicine or osteopathy, doctors of dental surgery or dental medicine, doctors of podiatric medicine, doctors of optometry, chiropractors, physician assistants, nurse practitioners, clinical nurse specialists and certified registered nurse anesthetists,” according to the bill. For those professionals, the bill appears to add further incentive to get involved in an APM. The bill states that professionals who receive a “significant portion” of their revenue from APMs will be excluded from the MIPS program.

3. **When does MIPS start?**
   Starting in 2019, physicians will see a payment adjustment, positive or negative, based on how their results compare with a national composite score. The negative payment adjustment will cap at 4%, and incentives will correspond to your standing in comparison to other practices. “Eligible professionals with higher performance scores will receive proportionally larger incentive payments up to a maximum of three times the annual cap for negative payment adjustments,” states the bill.

4. **What does this mean for my current quality reporting programs?**
   For now, stay the course with your reporting system. The details of the MIPS program have yet to be announced.

5. **What can I do right now to prepare?**
   Continue your current reporting programs, and consider researching more about APMs, such as a medical home or accountable care organization (ACO).
6. **How do incentive and penalties change under the MIPS program?**
   MIPS introduces a new incentive protocol, which is based on a "composite performance score" 0-100 based on the following four categories: quality, resource use, meaningful use and clinical performance improvement activities. Based on a composite score and how it compares with a "performance threshold," which is the mean composite score of all eligible professionals, you’ll receive a positive adjustment, negative adjustment or no adjustment.

7. **When will precise details be announced?**
   Expect to hear more details in the annual physician fee schedule updates.

8. **Will CMS offer assistance?**
   Yes, to practices of 15 or fewer EPs to help “improve MIPS performance or transition to APMs,” but those details also have yet to be announced.

**CONTACT YOUR SENATORS NOW: URGE PERMANENT SGR REPEAL**

The Senate returned from April recess on April 13th and all eyes are on them to quickly vote on H.R. 2, the Medicare Access and CHIP Reauthorization Act, which would permanently repeal the flawed Medicare Sustainable Growth Rate (SGR) formula and reverse the 21% cut that took effect on April 1.

These last few weeks, you have made your voice heard and we are close to permanent repeal of the SGR. We need your continued support in convincing your Senators to finalize the unprecedented progress made in the House of Representatives and pass SGR repeal once and for all.

Now is the time to act!

Contact your Senators today!

**Source: MGMA**

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**Source: Part B News**