

Sigh of Relief: CMS Announcement on COVID-19 and the QPP

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Quality Payment Program of Illinois
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Quality Payment Program of Illinois

Visit our website at <http://qpp-il.org>! We will help you navigate the complexities of the new CMS payment models so you can focus on what you do best – taking extraordinary care of your patients.

When you sign up for the QPP Resource Center®, you get access to resources that help you establish your baseline, identify goals, learn about requirements, and monitor progress. Plus, QPP Advisors are available to answer questions as they come up.



Northern Illinois
University



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Agenda

- MIPS Basics
 - Why am I included?
 - What do I have to do?
 - **What's the penalty if I don't participate?**
 - **What's the financial impact if I submit?**
 - CMS Announces QPP Relief
 - Deadline extension
 - Extreme and Uncontrollable Circumstances policy
 - Scoring and payment implications
 - Best Practice: Accessing the QPP website
 - Creating a HARP account
 - Connecting to a practice or clinician
 - Q&A
- * Modified by CMS announcement

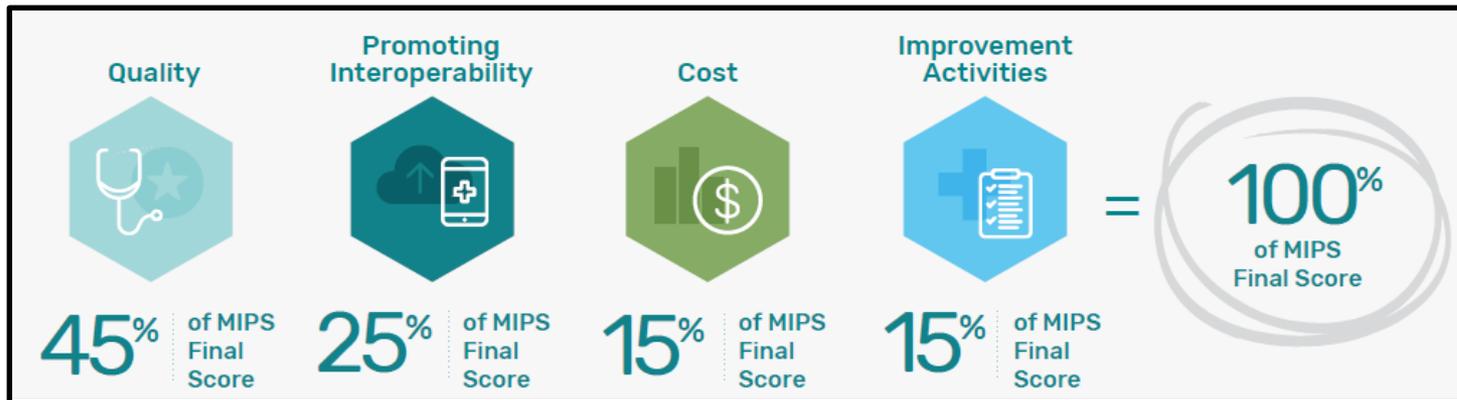
MIPS Basics

Why am I included?

- Many practices and clinicians believe MIPS does not apply to them due to confusion about the program
- We regularly hear some common reasons for this misunderstanding:
 - “We don’t use electronic health records”
 - “We’re just a small practice with one doctor”
 - “I mostly treat patients in the hospital/nursing homes”
 - “This doesn’t apply to my subspecialty”
 - “We don’t have face-to-face interaction with patients”
- While these circumstances can impact your MIPS participation, they are not exclusionary criteria
- Let’s go to the source: <https://qpp.cms.gov/mips/how-eligibility-is-determined>

What do I have to do?

- MIPS is like a grade card with a score ranging from 0-100
- Points are earned from data submitted for each of four categories:



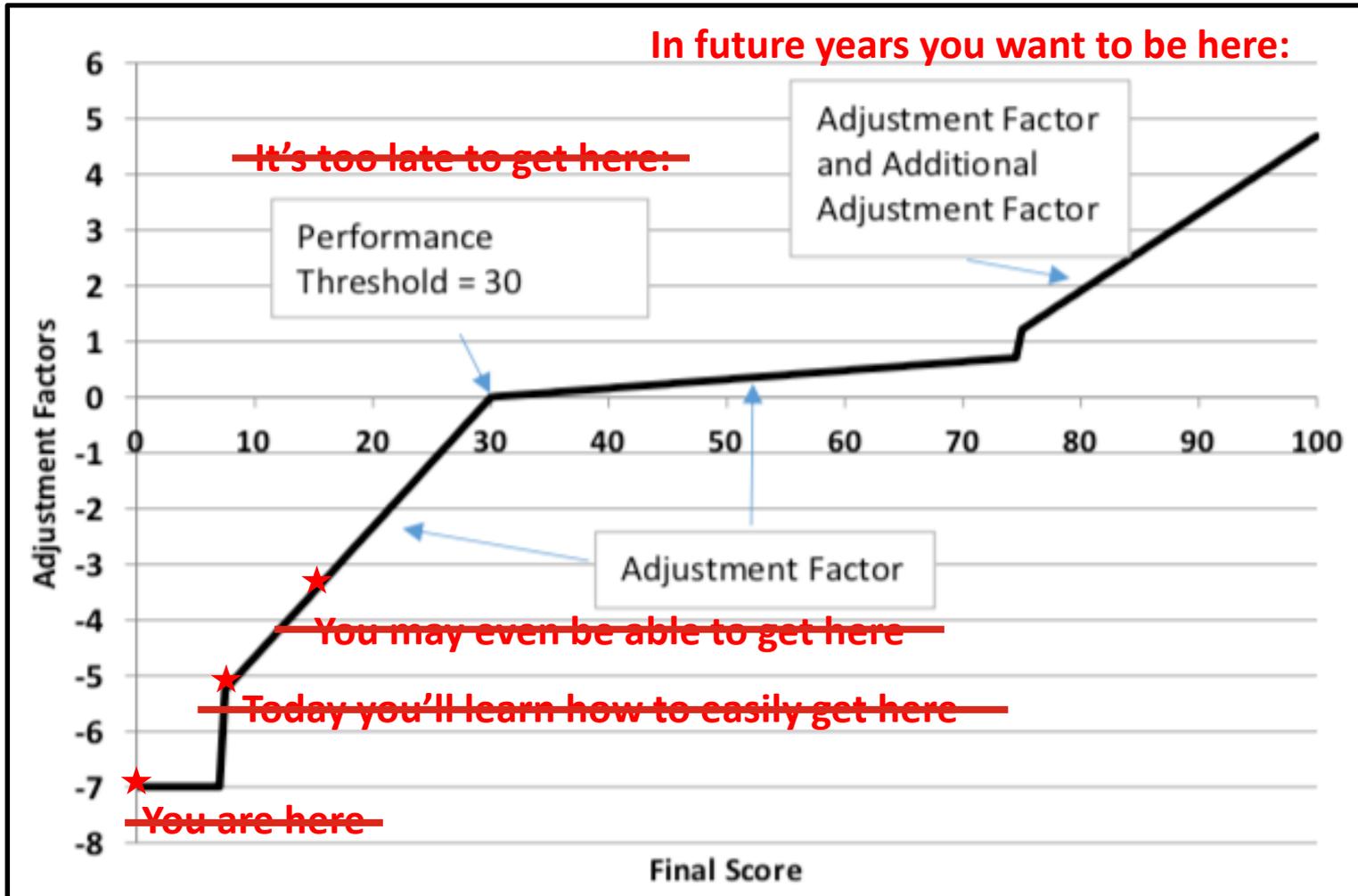
NOTE: these percentages apply for 2019; category weights change over time

- In some circumstances, special statuses or other criteria come into play:
 - Small practices can apply for hardship from Promoting Interoperability (use of Electronic Health Record system)
 - Hospital-based clinicians are automatically exempt from Promoting Interoperability

What's the penalty if I don't participate?

- Maximum penalty (“negative payment adjustment”) changes by year:
 - Year 1 (2017): -4% for non-participants
 - Year 2 (2018): -5% for non-participants
 - ~~Year 3 (2019): -7% for non-participants~~
 - Year 4+ (2020 and beyond): -9% for non-participants?? (TBD by CMS)
- Adjustments are in addition to the existing -2% for sequestration
- Adjustments will be applied two years after the year of non-participation
- ~~Example: (No longer applicable under relief policy)~~
 - ~~Clinician does not report for 2019~~
 - ~~For all of calendar year 2021, reimbursements will be paid at 91% of usual rates (7% for MIPS, 2% for sequestration)~~
- Adjustments are reset each year; chance to flip from negative to positive

What's the financial impact if I submit?



NOTE: this chart applies for 2019; the relationship between MIPS score and payment adjustments changes over time

CMS Announces QPP Relief

Deadline Extension

- The Centers for Medicare & Medicaid Services (CMS) getting red tape out of the way so the healthcare delivery system can focus on the 2019 Novel Coronavirus (COVID-19) response
- Data submission deadline for the 2019 program year has been extended by 30 days from March 31st, 2020 to April 30th, 2020
- If you have already submitted MIPS data or if you submit MIPS data by April 30, 2020, you may be scored and receive a MIPS payment adjustment based on the data you submit

Extreme and Uncontrollable Circumstances

- CMS is implementing Extreme and Uncontrollable Circumstances policy exceptions and extensions for reporting and data submission deadlines
- MIPS eligible clinicians who have not submitted any data by April 30, 2020 do not need to take any additional action to qualify
- Clinicians qualifying for hardship will be automatically identified and receive a neutral payment adjustment for the 2021 MIPS payment year
- If a MIPS eligible clinician submits data on two or more MIPS performance categories, they will be scored and receive a 2021 MIPS payment adjustment based on their 2019 MIPS final score
- **If you do not submit MIPS data, you will not be penalized**
- **If you do submit MIPS data, you can still earn a positive adjustment**

Scoring and Payment Implications

Submission Status	Previous score estimate	New score estimate	Previous adjustment estimate	New adjustment estimate
No data submitted	0	30	-7%	0%
Data submitted (1 category) – earning below neutral threshold	2.25 – 29.9	30	-7% to -0.01%	0%
Data submitted (Quality category only) – earning at or above neutral threshold	30 – 85	?? (either 30 or no change)	0% to 2.5%	?? (either 0% or no change)
Data submitted (2+ categories) - earning below neutral threshold	9.75 – 29.9	9.75 – 29.9	-4.5% to -0.01%	-4.5% to -0.01%
Data submitted (2+ categories) - earning at or above neutral threshold	30 – 100	30 -100	0% to 5%	?? (much smaller)

- If you do not submit, or submit minimum data for one category, you will not be penalized
- If you do submit, positive adjustments will be minimal

Scoring and Payment Implications

- Clinicians who have not submitted MIPS data:
 - Take no action to accept the automatic Extreme and Uncontrollable Circumstances hardship for a neutral adjustment
 - Use extension to submit two or more categories to earn a positive payment adjustment
- Clinicians who have submitted one MIPS category
 - Take no action to accept the automatic Extreme and Uncontrollable Circumstances hardship for a neutral adjustment
 - Submit data for an additional category to earn a positive payment adjustment
- Clinicians who have submitted two or more MIPS categories:
 - If earning positive payment adjustment, take no action
 - If earning negative payment adjustment, delete submitted data in order to qualify for Extreme and Uncontrollable Circumstances hardship for a neutral adjustment

Best Practice: Accessing the QPP Website

Note to Our Attendees

- We understand COVID has caused significant burden on many practices
- If you are satisfied knowing there will be no penalty for not reporting in 2019, feel free to leave the webinar now
- All attendees will receive a copy of slides and a link to the event recording
- For those who choose to stay, the following slides cover simple steps to become an authorized user for MIPS
- In most cases these can be completed in as little as 30 minutes
- Authorized users can review MIPS eligibility, submit/view performance data, and review payment adjustment feedback

Creating a HARP Account

- HARP accounts are used to log into several CMS systems, including the MIPS submission website
- HARP account setup requires:
 - Providing identifying information, including SSN
 - Completing identity proofing from Experian by answering questions related to brief credit check (bank names, terms of loans, etc.)
 - Setting up two-factor authentication to receive a code by phone, email or text each time you log in
- Visit <https://harp.qualitynet.org/register/profile-info> to create an account
- Reference video: <https://www.youtube.com/watch?v=G1zj8JqxWg4>

Connecting to a Practice or Clinician

- HARP account can be used to log into the MIPS submission website at <https://qpp.cms.gov>
- MIPS “knows” your identity via HARP but does not “know” whether you are authorized to act on behalf of a practice or individual clinician
- Becoming an authorized user (“Security Official”) for a practice requires:
 - Legal name or TIN
 - NPI and PTAN of at least one clinician in the group
- Becoming an authorized user for an individual clinician requires:
 - Confirming identity (if the HARP account info is an exact unique match with an existing clinician)
 - Manually verifying identity (if the HARP account info is not an exact unique match) using SSN, NPI and PTAN

Connecting to a Practice or Clinician

- Visit <https://qpp.cms.gov> and click “Sign In” in the upper right
- Enter HARP user ID and password, then click “Sign In” button
- To complete login, you will be prompted to send and confirm a code for two-factor authentication

Quality Payment PROGRAM

MIPS Merit-based Incentive Payment System.

APMs Alternative Payment Models

About The Quality Payment Program

Sign In Manage Account and Register

QPP Account

SIGN IN REGISTER

Sign In to QPP

USER ID

User ID

PASSWORD

Password

Show Password

Forgot your user id or password? [Recover ID or reset password.](#)

STATEMENT OF TRUTH

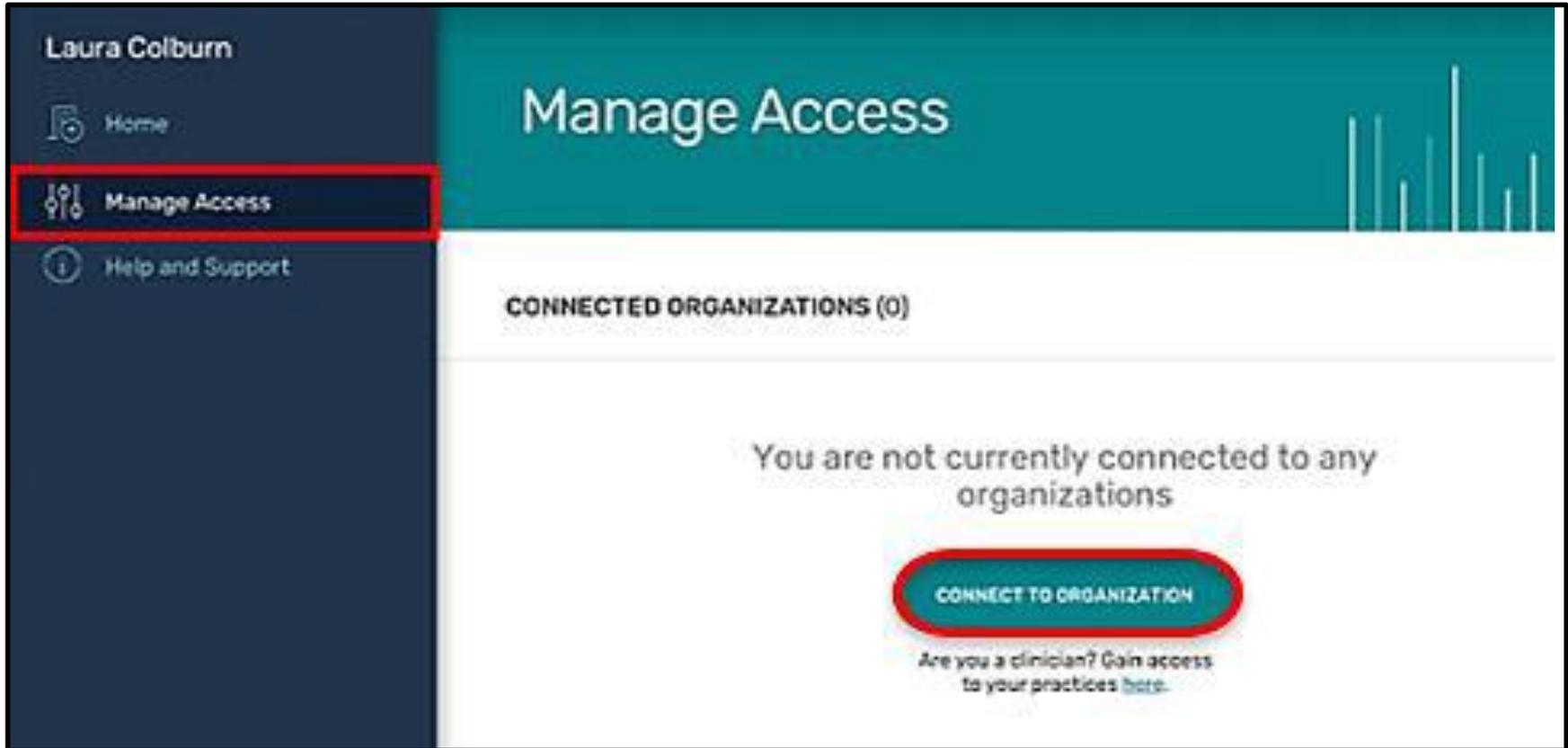
In order to sign in, you must agree to this: I certify to the best of my knowledge that all of the information that will be submitted will be true, accurate, and complete. If I become aware that any submitted information is not true, accurate, and complete, I will correct such information promptly. I understand that the knowing omission, misrepresentation, or falsification of any submitted information may be punished by criminal, civil, or administrative penalties, including fines, civil damages, and/or imprisonment.

Yes, I agree.

Sign In > Don't have an account? [Register](#)

Connecting to a Practice or Clinician

- Navigate to “Manage Access” and click “Connect to Organization”



The screenshot shows a web interface for 'Manage Access'. On the left is a dark blue sidebar with the user's name 'Laura Colburn' at the top. Below the name are three menu items: 'Home' with a house icon, 'Manage Access' with a puzzle piece icon (highlighted with a red box), and 'Help and Support' with an information icon. The main content area has a teal header with the text 'Manage Access' and a bar chart graphic. Below the header, it says 'CONNECTED ORGANIZATIONS (0)'. A large message in the center reads 'You are not currently connected to any organizations'. Below this message is a prominent red button with a white border that says 'CONNECT TO ORGANIZATION'. Underneath the button, there is a link: 'Are you a clinician? Gain access to your practices [here](#).'

Connecting to a Practice

- Select Organization Type - Practice

[Account Home](#) > [Manage Access](#) >

Connect to Organization

Step 1 of 3

Select Organization Type

- Practice**

A representative of a single TIN can request a practice role. The first Security Official will need to provide the PTAN and NPI of a single clinician that is part of that practice.
- Individual Clinician**

A clinician with NPI, SSN and PTAN information for one participating practice can request an individual clinician role. This clinician can individually report but cannot manage additional users or report for any other clinicians unless they connect to a practice and become the security official for that practice.

Connecting to a Practice

- Find a Practice by searching for TIN or legal business name

[Account Dashboard](#) > [Manage Access](#) >

Connect to Organization

Step 2 of 3

Find a Practice

Search for a practice by using the practice's 9-digit TIN or legal business name
(e.g. 123456789 or ACME Clinic)

BACK CONTINUE

Connecting to a Practice

- Select the practice and click Continue

Account Dashboard > Manage Access >

Connect to Organization

Step 2 of 3

Find a Practice

Search for a practice by using the practice's 9-digit TIN or legal business name (e.g. 123456789 or ACME Clinic)

Greenfield Medical Clinic ✓ Practice selected

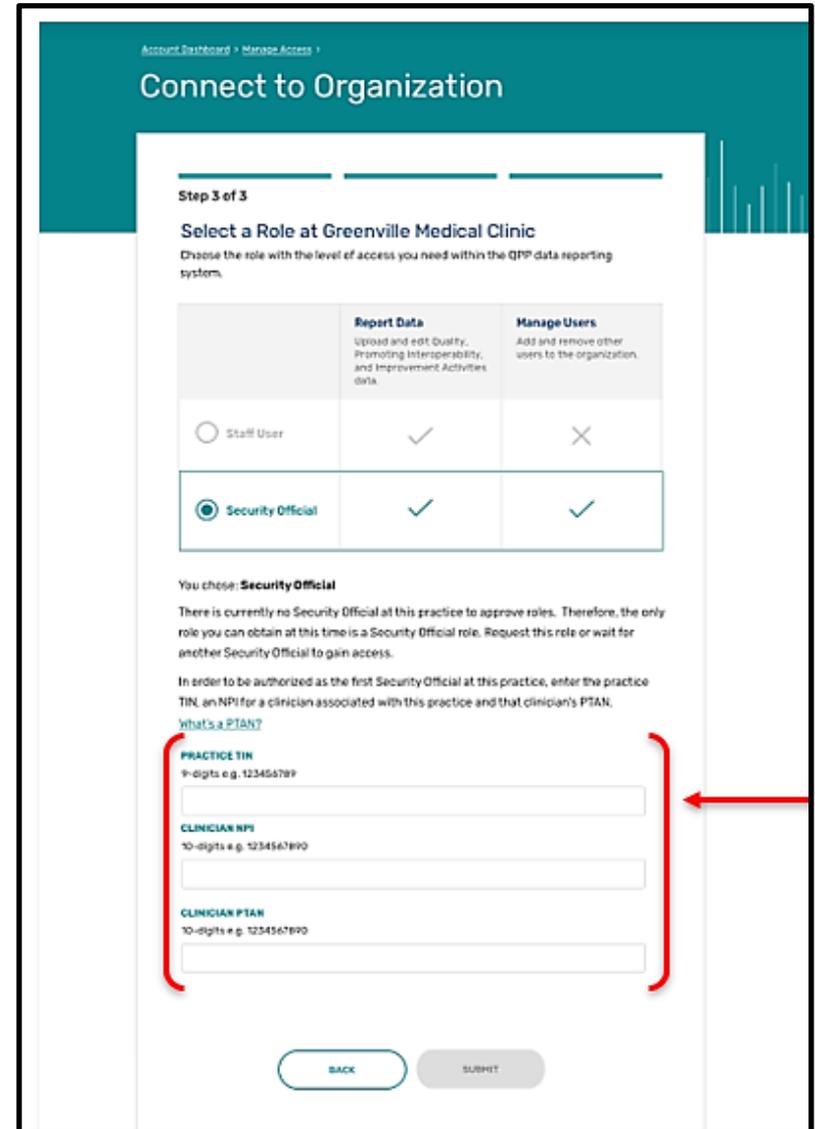
5200 Manchester Ln., New York, NY 01234

[Change organization](#)

BACK CONTINUE

Connecting to a Practice

- Select the Security Official role
- Complete the form below:
 - Practice TIN
 - Clinician NPI
 - Clinician PTAN
- Click the “Submit” button
- Receive notice that you are approved



The screenshot shows a web interface for connecting to an organization. The title is "Connect to Organization" and it is "Step 3 of 3". The user is selecting a role at "Greenville Medical Clinic".

	Report Data	Manage Users
<input type="radio"/> Staff User	Upload and edit Quality, Promoting Interoperability, and Improvement Activities data.	Add and remove other users to the organization.
<input checked="" type="radio"/> Security Official	✓	✓

You chose: **Security Official**

There is currently no Security Official at this practice to approve roles. Therefore, the only role you can obtain at this time is a Security Official role. Request this role or wait for another Security Official to gain access.

In order to be authorized as the first Security Official at this practice, enter the practice TIN, an NPI for a clinician associated with this practice and that clinician's PTAN.

[What's a PTAN?](#)

PRACTICE TIN
9-digits e.g. 123456789

CLINICIAN NPI
10-digits e.g. 1234567890

CLINICIAN PTAN
10-digits e.g. 1234567890

Buttons: BACK, SUBMIT

Connecting to an Individual Clinician

- Select Organization Type – Individual Clinician

[Account Home](#) > [Manage Access](#) >

Connect to Organization

Step 1 of 3

Select Organization Type

Practice

A representative of a single TIN can request a practice role. The first Security Official will need to provide the PTAN and NPI of a single clinician that is part of that practice.

Individual Clinician

A clinician with NPI, SSN and PTAN information for one participating practice can request an individual clinician role. This clinician can individually report but cannot manage additional users or report for any other clinicians unless they connect to a practice and become the security official for that practice.

Connecting to an Individual Clinician

- If the name associated with the HARP account is an exact unique match with a clinician name in the system, click the Verify button
- If the identity displayed is not correct, or there is no exact unique match with the HARP account name, connect manually by clicking “here” at bottom

here.' A red arrow points from the text 'here' in the list to this link."/>

Account Home > Manage Access >

Connect to Organization

Verify Your Identity

If you've ever been associated with any of the organizations listed below, click verify to get clinician access.

Your Name	LAURA COLBURN
NPI	0123456789
Organizations	GREENVILLE MEDICAL CLINIC
	HAMPTON MEDICAL CLINIC
	GREENVILLE PODIATRY
	ARLINGTON MEDICAL CENTER

[VERIFY](#)

If you don't recognize any of these organizations, try connecting manually [here](#).

Connecting to an Individual Clinician

- If manually verifying, enter clinician NPI, SSN and PTAN then click “Submit”

Account Home > Manage Access >

Connect to Organization

Verify Your Identity

Identify yourself by providing your 10-digit NPI and Social Security Number (SSN) and a PTAN associated with any of your practices.

CLINICIAN NPI
10-digits e.g. 1234567890

SSN
9-digits e.g. 123-45-6789

PTAN
This PTAN can be associated with any of your practices.

Q&A



THANK YOU!!

Quality Payment Program of Illinois

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