Merit-based Incentive Payment System (MIPS)

2024 <u>Measures and Activities</u> for Physician Assistants







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How to Use This Guide

How to Use This Guide

Please Note: This guide was prepared for informational purposes only and isn't intended to grant rights or impose obligations. The information provided is only intended to be a general summary. It isn't intended to take the place of the written law, including the regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

Table of Contents

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Hyperlinks

Hyperlinks to the <u>Quality Payment Program</u> website are included throughout the guide to direct the reader to more information and resources.



Overview

Ο V E R V I E W

What is the Merit-based Incentive Payment System?

If you're eligible for MIPS in 2024:

- You have to report measure and activity data for the <u>quality (PDF, 271KB)</u>, <u>improvement</u> <u>activities (PDF, 298KB)</u>, and <u>Promoting Interoperability (PDF, 244KB)</u> performance categories.
 - Exceptions to these reporting requirements include your <u>MIPS reporting option</u>, <u>special</u> <u>status</u>, clinician type, <u>extreme and uncontrollable circumstances (EUC)</u> or <u>hardship</u> <u>exception</u>. Detailed information will be available in the forthcoming 2024 Traditional MIPS Scoring Guide, 2024 APP Scoring Guide and 2024 MIPS Value Pathways Implementation Guide. These will be posted to the <u>QPP Resource Library</u>.
- We collect and calculate data for the <u>cost (PDF, 348KB)</u> performance category for you, if applicable.
 - Exceptions include your <u>MIPS reporting option</u>, <u>participation option</u>, <u>extreme and</u> <u>uncontrollable circumstances</u> and whether or not you meet the case minimum for any cost measures. Detailed information will be available in the forthcoming 2024 MIPS Cost User Guide, which will be posted on the <u>QPP Resource Library</u>.
- Your performance across the MIPS performance categories, each with a specific weight, will result in a MIPS final score of 0 to 100 points.
- Your MIPS final score will determine whether you receive a negative, neutral, or positive MIPS payment adjustment.
 - Positive payment adjustment for clinicians with a 2024 final score above 75.
 - Neutral payment adjustment for clinicians with a 2024 final score equal to 75.
 - Negative payment adjustment for clinicians with a 2024 final score below 75.
- Your MIPS payment adjustment is based on your performance during the 2024 performance year and applied to payments for your Medicare Part B-covered professional services beginning on January 1, 2026.

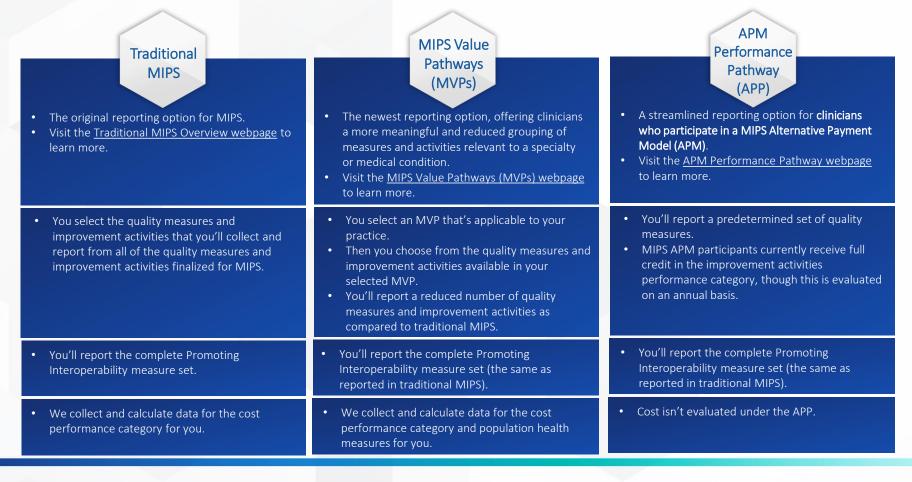
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To learn more about MIPS eligibility and participation options:

- Visit the <u>How MIPS Eligibility is</u> <u>Determined</u> and <u>Participation Options</u> <u>Overview</u> webpages on the <u>Quality</u> <u>Payment Program website</u>.
- Check your current participation status using the <u>QPP Participation Status</u> <u>Tool</u>.

What is the Merit-based Incentive Payment System (Continued)

There are **3 reporting options** available to MIPS eligible clinicians to meet MIPS reporting requirements:



OVERVIEW

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MIPS Value Pathways (MVPs)

MVPs are the newest way that you can meet reporting requirements, offering a more meaningful way to participate in MIPS.

- Each MVP includes a subset of measures and activities related to a specialty or medical condition.
- While some MVPs are considered most applicable to certain specialties, you aren't limited to only those identified MVPs. Clinicians may select the MVP that aligns best with their scope of care and for which they're able to meet the reporting requirements.

There are 16 MVPs finalized for the 2024 performance year.

You can review each MVP in detail by clicking the links below.

MVPs that are most applicable to the physician assistant specialty:

- Advancing Cancer Care MVP
- Advancing Care for Heart Disease MVP
- Focusing on Women's Health MVP
- Optimal Care for Kidney Health MVP
- Optimal Care for Patients with Episodic Neurological
 Conditions MVP
- <u>Prevention and Treatment of Infectious Disorders Including</u> <u>Hepatitis C and HIV MVP</u>
- Quality Care for the Treatment of Ear, Nose, and Throat
 Disorders MVP
- Value in Primary Care MVP

Additional MIPS MVPs available for 2024:

- <u>Adopting Best Practices and Promoting Patient Safety within</u>
 <u>Emergency Medicine MVP</u>
- Advancing Rheumatology Patient Care MVP
- <u>Coordinating Stroke Care to Promote Prevention and</u> <u>Cultivate Positive Outcomes MVP</u>
- Improving Care for Lower Extremity Joint Repair MVP
- <u>Patient Safety and Support of Positive Experiences with</u> <u>Anesthesia MVP</u>
- Quality Care in Mental Health and Substance Use Disorders
 <u>MVP</u>
- <u>Rehabilitative Support for Musculoskeletal Care MVP</u>
- <u>Supportive Care for Neurodegenerative Conditions MVP</u>



Performance Categories

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Quality Performance Category – Traditional MIPS

Getting Started with Quality

- 1. Understand Your Reporting Requirements
 - To meet the quality performance category requirements, you must report:

6 quality measures

Including at least 1 outcome measure or high-priority measure in absence of an applicable outcome measure.

A defined specialty measure set or sub-specialty measure set

If the measure set has fewer than 6 measures, you need to submit all applicable measures within that set.

2. Choose Your Quality Measures

- Use the 2024 Quality Measures List (XLSX, 999KB) to identify:
 - The available collection type(s) for each measure
 - Measure type (outcome, patient experience, etc.)
 - Specialty sets associated with each measure

Did you know?

• **Collection Type** refers to the way you collect data for a quality measure. While an individual quality measure may be collected in multiple ways, each collection type has its own specifications (instructions) for reporting that measure. You would follow the measure specifications that correspond with how you choose to collect your quality data.

OR

- For example: You're looking for a quality measure to report on the Use of High-Risk Medications in Older Adults (ID: 238). The measure is available as 2 distinct collections types with 2 distinct specifications: MIPS CQM (clinical quality measure) and eCQM (electronic clinical quality measure). You would use the measure specification that corresponds with how you choose to collect your data.
- You can report measures from multiple collection types to meet quality reporting requirements.

Quality Payment

Quality Performance Category – Traditional MIPS (Continued)

3. Collect Your Data

- You should **start data collection on January 1, 2024,** to meet data completeness requirements. If you fail to meet data completeness requirements, you'll receive zero points for the measure unless you're a small practice (15 or fewer clinicians), who will still receive 3 points.
- You must collect data for a 12-month performance period (January 1 to December 31, 2024).
- The data completeness requirement increased to 75% beginning with the 2024 performance period, which means that you need to report performance data (met, not met, or exclusion/exceptions) for at least 75% of denominator-eligible encounters.
- If you're working with a third party intermediary to collect and submit data, make sure you work with them throughout the year on data collection.

4. Submit Your Data

The data submission period will begin on January 2, 2025, and end no later than April 1, 2025. If reporting Medicare Part B claims measures, submission will be continuous throughout the performance period.

5. Review Performance Feedback

- Measure and activity-level scoring information will be available beginning January 2, 2025, once data has been submitted.
- We anticipate final scores will be available in summer 2025.
- You can review your performance feedback by signing in to the <u>Quality Payment</u> <u>Program website</u>.

Did you know?

The level at which you participate in MIPS (individual, group, or virtual group) applies to all performance categories. We won't combine data submitted at the individual, group, and/or virtual group level into a single final score.

For example:

- If you submit any data as an individual, you'll be evaluated for all performance categories as an individual.
- If your practice submits any data as a group, you'll be evaluated for all performance categories as a group.
- If a clinician has multiple final scores, CMS will use the following hierarchy to assign the final score and determine the payment adjustment:
 - o Virtual group final score
 - Highest available final score from the group or individual participation

* Note: Subgroups are only available within MVP reporting. Refer to the <u>MIPS Value</u> <u>Pathways (MVPs)</u> webpage for additional information.

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Quality Performance Category – Traditional MIPS (Continued)

The Physician Assistants Specialty Measure Set contains quality measures relevant to the physician assistants and includes the measures contained in the specialty sets below.

- Allergy/Immunology
- Cardiology
- Dermatology
- Emergency Medicine
- Family Medicine
- Gastroenterology
- General Surgery
- Geriatrics
- Hospitalists
- Infectious Disease
- Internal Medicine

- Mental/Behavioral Health and Psychology
- Nephrology
- Neurology
- Neurosurgical
- Obstetrics/Gynecology
- Pathology
- Ophthalmology and Optometry
- Oncology
- Orthopedic Surgery
- Otolaryngology

- Pediatrics
- Physical Medicine
- Plastic Surgery
- Podiatry
- Preventive Medicine
- Pulmonology
- Rheumatology
- Skilled Nursing Facility
- Urgent Care
- Urology
- Vascular Surgery



30% of final score for most MIPS eligible clinicians, groups, and virtual groups.

Please refer to <u>Help,</u> <u>Resources, and Version</u> <u>History</u> for more information.

In addition, MIPS eligible clinicians, groups, and virtual groups may want to consider applicable specialty-specific Qualified Clinical Data Registry (QCDR) measures that are available via the QCDR collection type only. Review the <u>2024 QCDR measure</u> <u>specifications (XLSX, 627KB)</u> on the <u>QPP Resource Library</u>.

CMS solicits recommendations from interested parties for potential consideration of new specialty measure sets and/or revisions to existing specialty measure sets on an annual basis. All feedback and submissions are considered for the next performance year's rulemaking and are made evident through publications of the Physician Fee Schedule proposed and final rules. CMS encourages interested parties to work with their specialty society to provide applicable measure recommendations during the specialty measure set solicitation process. Feedback/recommendations for a particular specialty set should be submitted during the Call for Specialty Sets at the beginning of the calendar year.

Promoting Interoperability Performance Category – Traditional MIPS

Promote patient engagement and electronic exchange of information using certified electronic health record technology (CEHRT)

In order to earn a score greater than zero for the Promoting Interoperability performance category, MIPS eligible clinicians, groups, and virtual groups must:



Collect your data using technology certified to the Office of the National Coordinator for Health Information Technology (ONC) Certification Criteria for Health IT necessary to meet the CEHRT definition (certified by the last day of the performance period) for a minimum of any continuous 180-day period in 2024;



Submit a "yes" to the Actions to Limit or Restrict Interoperability of CEHRT Attestation (formerly named Prevention of Information Blocking);



Submit a "yes" to the SAFER Guides attestation measure;



Submit a "yes" or "no" to the ONC Direct Review Attestation;



Submit a "yes" that you have completed the Security Risk Analysis measure in 2024;

Report the 6 to 7 required measures or claim their exclusion(s); and

• For measures that require a numerator and denominator (as defined in the measure specifications), you must submit at least a '1' in the numerator;



Submit your level of active engagement for the Public Health and Clinical Data Exchange measures you're reporting;

Provide your EHR's CMS identification code from the Certified Health IT Product List (CHPL), available on HealthIT.gov.

Clinicians must use technology certified to the criterion at <u>45 CFR 170.315(b)(3)</u> for the 2024 performance period. Functionality must be in place by the start of the performance period with certification obtained by the last day of the performance period. The 2024 Promoting Interoperability performance category scored objectives are:

e-Prescribing*

• Provider to Patient Exchange

• Health Information Exchange (HIE)*

- Public Health and Clinical Data Exchange*





25% of final score for most MIPS eligible clinicians, groups, and virtual groups.

*Measure exclusions may be applicable. Please review the individual measure specifications to see if you meet the exclusion criteria. You must claim an exclusion to have the measure points redistributed to another measure. The measure specifications are on the <u>QPP Resource</u> <u>Library</u>.

Promoting Interoperability Performance Category – Traditional MIPS (Continued)

Extend performance period to 180 days

• Performance period extended to a minimum of any continuous 180-day period within the 2024 calendar year.

Regulatory definition of CEHRT revised

• Regulatory definition of CEHRT to be more flexible in reflecting any changes ONC may make to certification criteria and standards for health information technology.

Self-Assessment of the High Priority Practices Safety Assurance Factors for EHR Resilience Guide (SAFER Guide)

• Requires the MIPS eligible clinicians to conduct this self-assessment annually and attest a "yes" response.

Updated the Query of Prescription Drug Monitoring Program (PDMP) under the e-Prescribing Objective

• Modified the second exclusion criterion to state that any MIPS eligible clinician who doesn't electronically prescribe any Schedule II opioids or Schedule III or IV drugs during the performance period can claim the second exclusion.

Reweighting the Promoting Interoperability Performance Category

• Continue to automatically reweight this performance category at 0% for clinical social workers for the calendar year 2024 performance period/2026 MIPS payment year.

Promoting Interoperability Performance Category – Traditional MIPS (Continued)

Qualifying hospital-based, Ambulatory Surgical Center (ASC)-based, small practice, and non-patient-facing MIPS eligible clinicians, groups, and virtual groups will automatically have their Promoting Interoperability performance category score reweighted to 0% of the final score. You can find additional information on the <u>Special Statuses</u> webpage.

Hospital-Based MIPS Eligible Clinicians	 A hospital-based MIPS eligible clinician is defined as furnishing 75% or more of their covered professional services in either the off-campus outpatient hospital (Place of Service 19), inpatient hospital (Place of Service 21), on-campus outpatient hospital (Place of Service 22), or emergency department (Place of Service 23) setting. A group or virtual group is considered hospital-based when more than 75% of the clinicians in the group or virtual group are hospital-based MIPS eligible clinicians.
Non-Patient-Facing MIPS Eligible Clinicians	 A non-patient-facing MIPS eligible clinician is defined as an individual MIPS eligible clinician who bills 100 or fewer patient-facing encounters (including Medicare telehealth services defined in <u>section 1834(m)</u> of the Social Security Act) during the MIPS determination period. To qualify as a non-patient-facing group or virtual group, more than 75% of the clinicians in the group or virtual group must meet the definition of a non-patient-facing individual MIPS eligible clinician.

- In the case of reweighting to 0%, CMS will assign the 25% from the Promoting Interoperability performance category to another performance category or categories.
- MIPS eligible clinicians, groups, and virtual groups that qualify for reweighting of the Promoting Interoperability performance category can still choose to report if they would like, and if data is submitted, CMS will score their performance and weight their Promoting Interoperability performance accordingly.

See the <u>2024 Promoting Interoperability Quick Start Guide (PDF, 1MB)</u> for more information on Promoting Interoperability performance category objectives and measures, reporting requirements, scoring, and reweighting. Comprehensive information about hardship exceptions for the 2024 Promoting Interoperability performance category will be available on the <u>QPP Resource Library</u> later in the year.

Improvement Activities Performance Category – Traditional MIPS

Participation in activities that improve clinical practice are encouraged, such as:

- Ongoing care coordination
- · Clinician and patient shared decision making
- Using quality improvement best practices and validated tools
- Regularly using patient safety best practices
- Making progress in achieving health equity

During the 2024 performance year, MIPS eligible clinicians, groups, and virtual groups will be able to choose from 100+ activities. The activities listed below are suggestions, not requirements or preferences on the part of CMS. MIPS eligible clinicians, groups, and virtual groups can choose activities that are most appropriate for their practice/patient populations from the full 2024 improvement activities inventory (ZIP, 499KB). The MIPS data validation criteria (ZIP, 599KB) document provides supporting information and guidance on documentation requirements for improvement activities. The 2024 Improvement Activities Quick Start Guide (PDF, 928KB) contains additional information.

Clinicians may select activities from the posted inventory. Some recommendations for the physician assistants specialty are included below:

- IA_AHE_6 Provide education opportunities for new clinicians
- IA_BE_6 Regularly assess patient experience of care and follow up on findings
- IA_BE_25 Drug cost transparency
- IA_CC_2 Implementation of improvements that contribute to more timely communication of test results
- IA_CC_8 Implementation of documentation improvements for practice/process improvements

- IA_CC_9 Implementation of practices/processes for developing regular individual care plans
- IA_CC_10 Care transition documentation practice improvements
- IA_CC_18 Relationship-centered communication
- IA_EPA_3 Collection and use of patient experience and satisfaction data on access
- IA_PM_21 Advance care planning

Note: Attestation to IA_PCMH: Electronic submission of Patient Centered Medical Home accreditation (or comparable specialty practice) improvement activity results in an improvement activities performance category score of 100% as finalized in the Calendar Year (CY) 2021 Medicare Physician Fee Schedule (PFS) Final Rule.

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15% of final score for most MIPS eligible clinicians, groups, and virtual groups.

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<u>Cost Performance Category</u> – Traditional MIPS

Helps create efficiencies in Medicare spending

- The 2024 performance period includes 2 population-based cost measures:
 - Medicare Spending Per Beneficiary Clinician measure, which assesses costs surrounding a hospital stay.
 - Revised Total Per Capita Cost measure, which assesses overall cost of care.
- It also includes 27 episode-based cost measures across a range of procedures, acute inpatient medical conditions requiring a hospital stay, settings (i.e., emergency medicine), and chronic conditions.
- A full list of the MIPS cost measures is available in the <u>2024 MIPS Summary of Cost Measures (PDF,</u> <u>505KB</u>) document.
- Data for cost measurement are collected from Medicare Parts A and B claims submitted by MIPS eligible clinicians, groups, and virtual groups. Certain measures also incorporate Part D costs. Clinicians, groups, and virtual groups don't have to submit any additional data.
- For a cost measure to be scored, a MIPS eligible clinician, group, or virtual group must have enough attributed cases to meet or exceed the case minimum for that measure.
- For most MIPS eligible clinicians, groups, and virtual groups who don't have a cost performance category score assigned, the majority of the cost weight goes to the quality performance category. This is true if only the cost performance category is reweighted.
- Benchmarks based on data from the performance period will be established for each cost measure. Since the benchmark isn't based on a historical baseline period, CMS can't publish the numerical benchmarks for the cost measures before the start of each performance period.
 - A MIPS eligible clinician, group, or virtual group can compare their costs for each measure with the benchmark information provided in their performance feedback to better understand their performance relative to their peers.



Ouality Payment

30% of final score for most MIPS eligible clinicians, groups, and virtual groups.

Cost Performance Category – Traditional MIPS (Continued)

CMS will automatically reweight the cost performance category for MIPS eligible clinicians, groups, and virtual groups located in a CMS-designated region that has been affected by extreme and uncontrollable circumstances.

• For MIPS eligible clinicians, groups, and virtual groups that are designated in the extreme and uncontrollable circumstances policy, they won't receive a score for the cost performance category, regardless of whether they have applicable cost measures.

The <u>2024 Cost Quick Start Guide (PDF, 1MB)</u> in the <u>Quality Payment Program Resource Library</u> contains additional information for the cost performance category.

Did you know?

If only 1 cost measure can be scored, that cost measure's score will serve as the performance category score. If 3 out of 25 cost measures are scored, the **cost performance category score is the equally-weighted average of the 3 scored measures**. If none of the 25 measures can be scored, the MIPS eligible clinician, group, or virtual group won't be scored on cost, and the weight of the cost performance category would be reweighted.



Help, Resources, and Version History

HELP, RESOURCES, AND VERSION HISTORY

Quality Payment

Where Can You Go for Help?

Contact the Quality Payment Program Service Center by email at <u>QPP@cms.hhs.gov</u>, by creating a <u>QPP Service Center ticket</u>, or by phone at 1-866-288-8292 (Monday through Friday, 8 a.m. - 8 p.m. ET). To receive assistance more quickly, please consider calling during nonpeak hours—before 10 a.m. and after 2 p.m. ET.

 People who are deaf or hard of hearing can dial 711 to be connected to a TRS Communications Assistant. Visit the <u>Quality Payment Program</u> website for other <u>help and support</u> information, to learn more about <u>MIPS</u>, and to check out the resources available in the <u>Quality</u> <u>Payment Program Resource Library</u>.

Visit the <u>Small Practices page</u> of the Quality Payment Program website where you can **sign up for the monthly QPP Small Practices Newsletter** and find resources and information relevant for small practices.

HELP, RESOURCES, AND VERSION HISTORY

Additional Resources

The following resources are available in the QPP Resource Library and other QPP and CMS webpages:

- 2024 MIPS Overview Quick Start Guide (PDF, 1MB)
- 2024 MIPS Quick Start Guide for Small Practices (PDF, 1MB)
- 2024 MIPS Data Validation Criteria (ZIP, 599KB)
- 2024 Quality Quick Start Guide (PDF, 981KB)
- 2024 MIPS Eligibility and Participation Quick Start Guide (PDF, 1MB)
- 2024 Part B Claims Reporting Quick Start Guide (PDF, 1MB)
- 2024 MIPS Quality Measures List (XLSX, 999KB)
- 2024 Clinical Quality Measure Specifications and Supporting Documents (ZIP, 58MB)
- 2024 Medicare Part B Claims Measure Specifications and Supporting Documents (ZIP, 10MB)
- 2024 eCQM Measure Specifications (Links)
- 2024 MIPS Promoting Interoperability Quick Start Guide (PDF, 1MB)
- 2024 MIPS Promoting Interoperability Measure Specifications (ZIP, 3MB)
- 2024 Improvement Activities Quick Start Guide (PDF, 924KB)
- 2024 Improvement Activities Inventory (ZIP, 499KB)
- 2024 Cost Quick Start Guide (PDF, 1MB)
- 2024 Summary of Cost Measures (PDF, 505KB)
- 2024 MIPS Cost Measure Codes Lists (ZIP, 14MB)
- 2024 Quality Payment Program Final Rule Resources (ZIP, 1MB)

HELP, RESOURCES, AND VERSION HISTORY



Version History

If we need to update this document, changes will be identified here.

DATE	DESCRIPTION
04/10/2024	Original Posting.