Facility-Based Measurement: A Practical Overview

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Welcome

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Today

- Quality Payment Program (QPP) and Merit-based Incentive Payment System (MIPS)
- Confirm your Facility-Based Status
- Facility-Based Reporting: Impact on MIPS Categories
- Facility-Based Preview and Interpretation
Quality Payment Program Pathways

QPP

MIPS
- Quality
- Improvement Activities
- Promoting Interoperability
- Cost

Advanced APMs
Facility-Based Definition

• Individual Facility-Based Clinician
  o 75% or more of covered professional services
    ▪ Inpatient hospital (POS 21) or
    ▪ On-campus outpatient hospital (POS 22) or
    ▪ Emergency Room (POS 23), and
  o At least one service billed with POS 21 or 23

• Facility-Based Group
  o At least 75% of MIPS eligible clinicians billing under the group’s TIN are identified as facility-based

• Attributed to a facility with a Hospital VBP score
To Confirm Your 2019 Facility-Based Status

https://qpp.cms.gov/participation-lookup

Before you log on, have available:

1. HCQIS Access Roles and Profile System (HARP) credentials (formerly known as Enterprise Identity Data Management or EIDM)

2. Tax Identification Number (TIN)

3. National Provider Identifier (NPI)
What does Facility-Based Status Mean for MIPS Reporting?

• Quality and Cost
  o Scores automatically assigned based on attributed facility’s Hospital Value-Based Purchasing program

• Improvement Activities (IAs)
  o Facility-based pathologists should attest to IAs separately to maximize their MIPS score
  o Facility-based pathology groups must attest to IAs separately from the facility in order to be assessed as a group

• Promoting Interoperability (PI)
  o Re-weighted to Quality
# MIPS Performance Category Weights

<table>
<thead>
<tr>
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<th>“Traditional” MIPS Reporting</th>
<th>Facility-Based Reporting</th>
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</thead>
<tbody>
<tr>
<td>Quality</td>
<td>85%</td>
<td>70%</td>
</tr>
<tr>
<td>Cost</td>
<td>0%</td>
<td>15%</td>
</tr>
<tr>
<td>Improvement Activities</td>
<td>15%</td>
<td>15%</td>
</tr>
<tr>
<td>Promoting Interoperability</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
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Facility-Based Preview

- CMS will provide preview of what Quality and Cost scores could look like for 2019 MIPS performance period for facility-based clinicians and groups
  - Preview translates Hospital Value-Based Purchasing (VBP) Total Performance Score (TPS) to MIPS Quality and Cost category scores
  - Not actual scores
- Sign into https://qpp.cms.gov/login with your HARP credentials
- Once you’re signed-in, from the home page, click Preview Facility Score (or click the Facility Based Preview link in the left-hand navigation)
Facility-Based Preview: Hospital VBP Score Percentile and Performance Rate

HVBP Score 43.88% 73rd

Percentile

Performance Rate

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Facility-Based Preview: Cost Performance Rate and Percentile

\[
\text{Cost Category} \quad \frac{81.4\%}{\times} \quad 15 = \frac{12.21}{\text{out of } 15}
\]
Facility-Based Preview: Quality Performance Rate and Percentile

97.6% x 70 = 68.32 out of 70
Separate MIPS Submission to Maximize Score

• Preview reflects FY2019 Hospital VBP scores mapped to 2017 performance period QPP data

• Actual scores for 2019 MIPS will use the FY2020 Hospital VBP scores mapped to QPP data from the 2019 performance period

• Scores between the preview and 2019 MIPS may change
  o Changes in the hospital to which the clinician or group is attributed
  o Updates to the HVBP TPS between FY 2019 and FY2020 at the attributed hospital
  o Updates to the distribution of MIPS quality and cost performance scores

• Report on MIPS separately if not confident in your hospital’s VBP score
  o CMS will take the higher score
To Summarize…

• Check your or your group’s facility-based status
  o [https://qpp.cms.gov/participation-lookup](https://qpp.cms.gov/participation-lookup)

• Preview your facility-based score
  o [https://qpp.cms.gov/login](https://qpp.cms.gov/login)
  o Not your actual score but based on previous data to provide an estimate

• Submit MIPS data separately to maximize score

• Remember to attest to Improvement Activities
The CAP Has MIPS Resources

• Visit cap.org/advocacy for MIPS tools and resources
  o Making Sense of CMS’s Quality Payment Program (Video)
  o MIPS Checklist for Pathologists
  o MIPS FAQs
  o MIPS Financial Impact Calculator
  o Understanding Your MIPS Reporting Options
  o Pathology-specific Quality Measures
  o 2019 Improvement Activities for Pathologists

• Read Advocacy Update - The CAP Advocacy Newsletter
Questions?

Email us at MIPS@cap.org