



Promote Simplification and Data Sharing in the Merit-based Incentive Payment System



ISSUE OVERVIEW:

2019 will be the third year for the Quality Payment Program (QPP), which was developed by the Center for Medicare and Medicaid Services (CMS) to meet the requirements of the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA). MACRA repealed the Sustainable Growth Rate formula, or SGR, which previously served as the basis for determining Medicare physician payments. The American Academy of Dermatology Association (AADA), along with its partners in the physician community, worked with Congress to eliminate the SGR and introduce a new payment system. MACRA was intended to promote the development of alternative payment models (APMs), while also preserving fee-for-service in Medicare through the consolidation of multiple reporting programs into the new Merit-based Incentive Payment System (MIPS), which links fee-for-service payments to physicians to an overall physician quality score.

The majority of dermatologists participate in the MIPS portion of the QPP. MIPS scores participating physicians on quality measures, use of electronic health records (EHR) and practice improvement activities. Scores can result in physicians meeting threshold (which means no Medicare payment adjustment), receiving bonus payments for scoring above threshold, or being penalized through lower payments if failing to meet a score threshold. Physicians can report for MIPS to CMS through their EHR, through claims, through the CMS web interface, through attestation, or through a Qualified Clinical Data Registry (QCDR), such as the Academy's DataDerm.

Since the launch of QPP, CMS has worked with Congress and the physician community to reduce the reporting burden on physicians to ensure the QPP meets its goal of enhancing the physician experience, while improving care across the entire health care delivery system. The AADA anticipates further reduction in reporting will come through increased credit for the use of QCDRs, and increased emphasis on exchange of electronic health data in years to come. This is welcome news as 2,700 DataDerm participants in 2017 avoided the penalty for MIPS, with approximately 30% of these DataDerm participants being recognized as "high performers" under MIPS.

Rewarding physicians for participating in a QCDR not only allows physicians to report on performance measures that are approved by CMS, but it also promotes QCDRs' development of quality measures that are relevant and meaningful to practicing physicians. Participation in a registry is not only important for MIPS reporting, but for continued promotion of quality of care for all patients. In the future, registries such as DataDerm will hold the key for data-driven policy changes.

Unfortunately, many QCDRs face data blocking from EHRs. There are EHR vendors who refuse to transfer patient information to QCDRs, while others require physicians to pay exorbitant fees to send patient data from their EHR to a QCDR. This lack of data sharing not only inhibits QCDRs from conducting analyses for quality improvement purposes, but also creates inefficiencies for physicians reporting their data for MIPS. The ability of QCDRs to access patient information from EHR vendors is crucial for such registries to not only achieve their missions of improving quality of care, but also to foster the development of quality measures that are relevant and meaningful to practicing physicians.

QCDR participation is not only a way of measuring quality but a means for improving clinical care. The AADA recommends that participation in QCDR reporting be sufficient for meeting threshold status for MIPS providers. This would encourage EHR vendors to more readily share patient data, since MIPS credit is a major selling point for EHRs.

LEGISLATIVE ASK

HOUSE:



CO-SIGN A LETTER TO HHS which would call on the Department to streamline reporting and promote data sharing in the Merit-based Incentive Payment System (MIPS).

SENATE:



CO-SIGN A LETTER TO HHS which would call on the Department to streamline reporting and promote data sharing in the Merit-based Incentive Payment System (MIPS).