



Preparing for arrival of CMS Quality Payment Program year 4

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It's here: 2020 is year four of the Quality Payment Program (QPP), established by the Medicare Access and Children's Health Insurance Program Reauthorization Act (MACRA) in 2015. QPP requires that most physicians who submit claims to the Centers for Medicare and Medicaid Services (CMS) participate in one of two programs to avoid a reimbursement penalty: the Merit-based Incentive Payment System (MIPS) or an Advanced Alternative Payment Model (APM).

Physicians who do not participate adequately this year face a 9% penalty in their 2022 Medicare reimbursements. As there currently is no approved vascular condition-specific APM, many vascular surgeons will participate in MIPS if they are not part of a multispecialty APM. Vascular surgeons in independent practices can consider exploring joining such an APM to satisfy QPP participation requirements.

CMS has gradually increased the minimum QPP performance requirements yearly. For MIPS year four, there are four performance categories; weights for each contribute to the final score and are unchanged from year three: Quality (45%), Cost (15%), Promoting Interoperability (25%) and Improvement Activities (15%).

Clinicians must report certain measures from each of the four objectives unless a valid exclusion is claimed. The minimum performance threshold for the 2020 performance period to avoid the 2022 payment penalty is 45 points (increased from 30 in year three). There is a \$500 million pool for exceptional performers. The threshold for exceptional performance in year four is 85 points (increased from 70).

These MIPS changes will have a significant impact on vascular surgery and should be considered in a surgeon's strategy for participating in QPP in 2020. Further details regarding MIPS year four participation can be found online at vsweb.org/MIPS4Participation.

The Nashville Vascular and Vein Institute (NVAVI), a private practice, shared its experience with meeting QPP requirements. The institute planned that reporting would be handled through attestation and utilization of electronic health record functionality via MIPS, and reported the method is not difficult. However, it also transpired NVAVI is included in a local, hospital-associated APM. This emphasizes the importance of checking your QPP participation status at vsweb.org/QPPStatus. *Note: This article predates any COVID-19-related deadline alterations.*

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