# How Medicare Quality Requirements Will Impact Reimbursement, and Practical Tips to Successfully Meet Them

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# Background

- Evolution from Fee-for-Service (FFS) to Value Based Payment Models (VBMs)
- Within VBM framework there is a push to Alternative Payment Models (APMs) and Team based care
- Healthcare team accepts financial risk, and will want to minimize

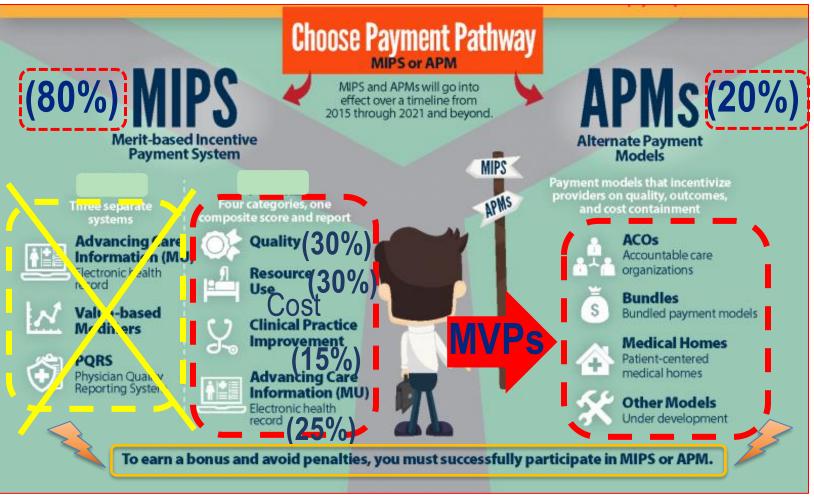


# Goals for this section

- What is the QPP?
- How do physicians report within the QPP?
- What do physicians report in the QPP?
- What does CMS gather for the QPP?
- How is payment impacted by reported measures?
- What are MVPs and how are they developed?



# MACRA - 2015 introduces QPP





Am Coll Rheum

# MIPS - 4 categories for final score

- 1. Quality
- 2. Improvement activities
- 3. Promoting Interoperability

Require Reporting (registries, e.g.)

4. Cost 
 Claims data-no reporting, no choice of measures
 Episode Based Cost Measures (EBCMs)
 2/23 measures are vascular



# MIPS Value Pathways - MVPs

Early MVP Future MVP Current MIPS Fewer, specialty specific, aligned Harmonized cross-specialty Promoting Interoperability 6 Quality Cost mprovement 6+ 6+ Activities Measures Cost Measures ality and IA aligned Foundation Foundation Promoting Interoperability Claims based **Promoting Interoperability** Cost Population Health Measures 🛹 Improvement **PH** priorities Activities **Population Health Measures** Enhanced Performance Feedback 1 or More 2-4 Patient-Reported Outcomes Measures Activities

APM



# Quality

Traditional MIPS	APM Performance Pathway (APP)	MIPS Value Pathway (MVP)
Select 6 QMs to report (from 100s)	Report a specified set of 3 QMs	Select <mark>4 QMs</mark> from MVP (from ~ 10)
Automatically evaluated on all claims- based measures for the program	Shared savings ACOs can report the 10 CMS web interface measures (preventative care & screening)	Choose a claims-based population health measure to be evaluated on
Must meet min case #s		Must meet min case #s
Have Data completeness (70%)	Administer CAHPS	
		Is part of Quality score but is considered part of "foundational layer" - consistent across all MVPs

% of adult HD patient months using a catheter continuously for 3 months or longer % of patients 18-75 years with diabetes having Hgb A1c > 9.0% during the measurement period % of patients <u>></u> 65 years who have an advance care plan

# **Improvement Activities**

#### **Traditional MIPS**

- Select to reach max 40 points: -2 high-weighted activities, or -4 medium-weighted activities, or
- -1 high-weighted + 2 medium-weighted activities
- If special status can report: -1 high-weighted activity, *or* -2 medium-weighted activities

#### **APM Performance Pathway (APP)**

None required - APP reporting fulfills

#### **MIPS Value Pathway (MVP)**

Select based on available in MVP to reach max 40 points (from ~ 10) -1 high-weighted activity, or -2 medium-weighted activities, or Report the IA\_PCMH (participation in a certified or recognized patientcentered medical home or comparable specialty practice)

#### \*Examples:

Promote Use of Patient-Reported Outcome Tools (High) Engagement of Patients, Family, and Caregivers in Developing a Plan of Care (Medium) Implement improvements contributing to more timely communication of test results (Medium)

\*From the "Optimal Care for Kidney Health" MVP

# **Promoting Interoperability**

**Traditional MIPS** 

**APM Performance Pathway (APP)** 

**MIPS Value Pathway (MVP)** 

Use EHR technology certified by ONC to meet the 2015 Edition Cures Update certification criteria

Provide your EHR's CMS identification code from the Certified Health IT Product List (CHPL)

Submit performance data for the required measures in each objective (unless an exclusion is claimed) for the same 90-day continuous performance period (or more)

Complete the required, but unscored, attestation statements

\*Examples: e-Prescribing (Required) Provide Patients Electronic Access to their Health Information (Required) Clinical Data Registry Reporting (Optional)



# Cost

Traditional MIPS	APM Performance Pathway (APP)	MIPS Value Pathway (MVP)
Data submission not required	APP does not measure cost performance	Data submission not required
Clinicians and Groups scored on all cost measures where case # requirements are met or exceed From: 2 global (TPCC, MSPB) 2/23 EBCMs -HD Access Creation -Revascularization for Lower Extremity Chronic Critical Limb Ischemia		MVP assesses cost on specific measures from within the MVP

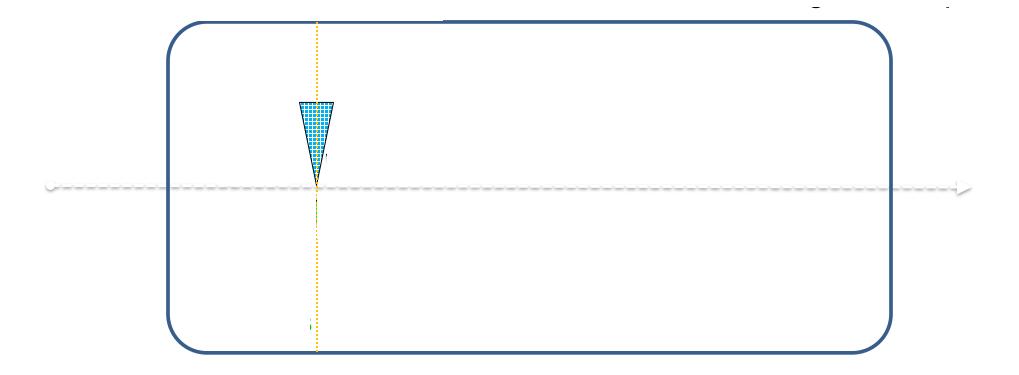
\*Examples:

Acute Kidney Injury Requiring New Inpatient Dialysis episode-based cost measure (EBCM) HD Access Creation episode-based cost measure (EBCM) Total Per Capita Cost (TPCC)

# **EBCM Schematic - HD Access Creation**

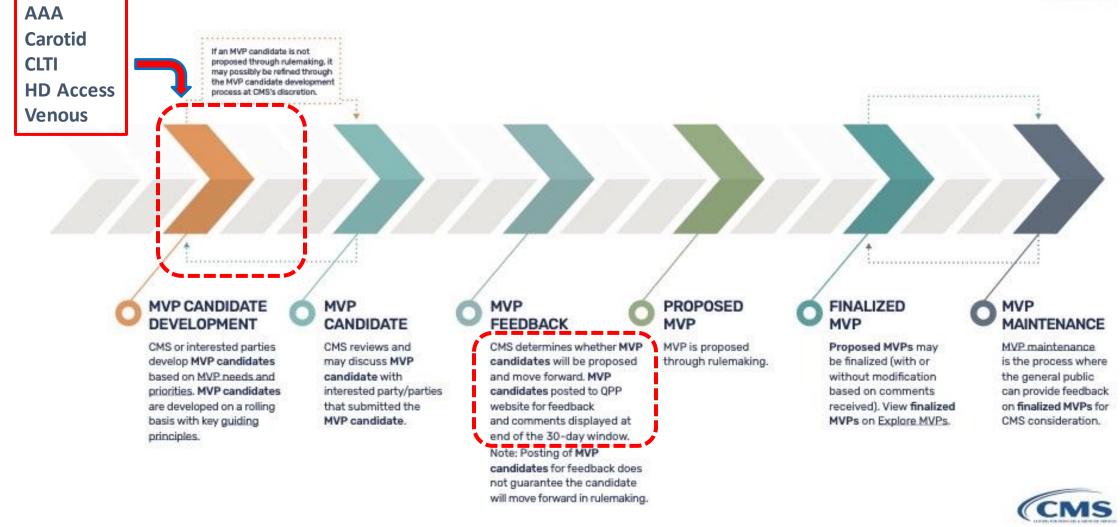
Trigger Service AV Access Creation-Codes

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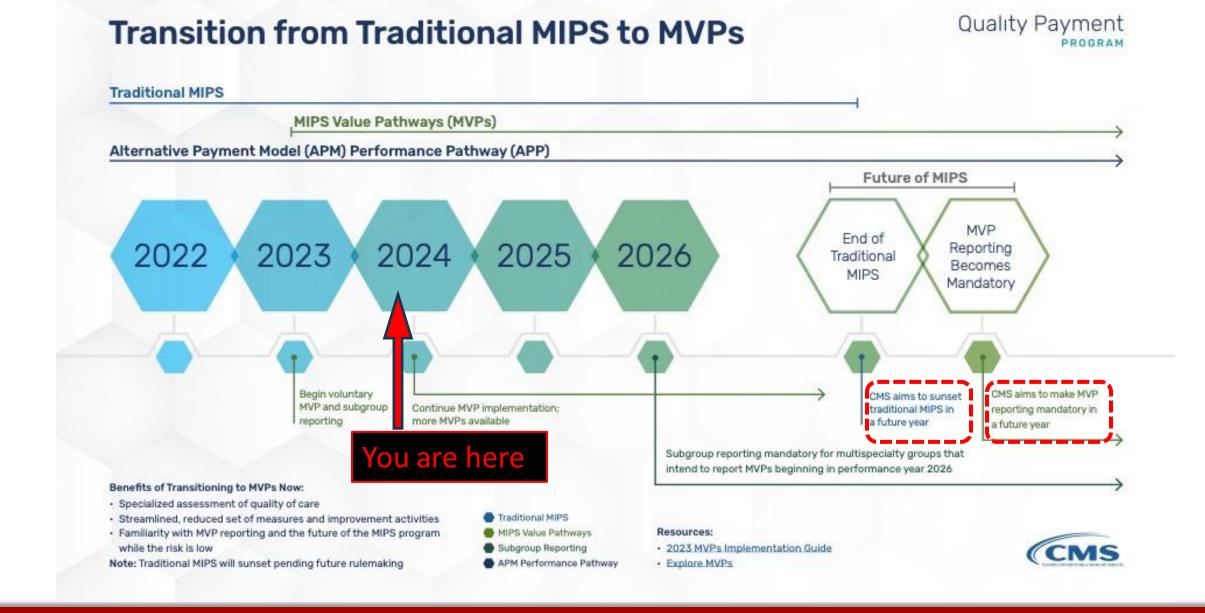


### MVP Development Process (>1 year)

### Quality Payment







#### SVS Society for Vascular Surgery

### https://vascular.org/advocacy/macra-qpp-resources

Society for Vascular Surgery

Vascular Specialists 😔

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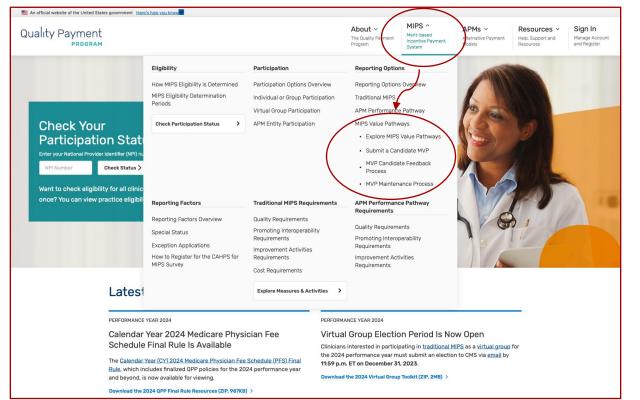
#### MACRA, QPP Resources

#### Your resources for MACRA, MIPS, QPP and more

The Medicare Access and Children's Health Insurance Plan Reauthorization Act (MACRA) was signed into law on April 16, 2015. MACRA is bipartisan legislation which repealed the Sustainable Growth Rate and established the Quality Payment Program (QPP). The QPP requires that most physicians who submit claims to the Centers for Medicare and Medicaid Services (CMS) participate in one of two programs: Merit-based Incentive Payment System (MIPS) or Advanced Alternative Payment Model (APM).

Based on feedback from physicians and stakeholders led the QPP to create the following objectives:

### **QPP.CMS.GOV**





# **Current SVS Member QPP Performance and Anticipated Changes**

Caitlin W. Hicks MD, MS

SVS QPMC Vice Chair

Associate Professor, Division of Vascular Surgery

Johns Hopkins University



# Goals for this section

- What measures are SVS members reporting in the QPP?
- What do the SVS MVPs in development look like and what measures do they contain?
- How are SVS members performing?



### https://vascular.org/advocacy/macra-qpp-resources

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	Your resources for MACRA, MIPS	5, QPP	and n	nore			
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	Based on your performance on CMS quality measure CMS payment cuts. It is pivotal for physicians to kno publicly makes available your performance data ava reporting that is reflective of the care you provide. W coordinating data definitions and instructions. If you SVSquality@vascularsociety.org.	w what m ilable ann /e have cr	easures a ually. This eated a fil	re being report information v e where you c	rted on t vill help an look i	heir behalf. CMS guide you in leve up your informat	eraging
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2023 QPP Report 2021 Performance

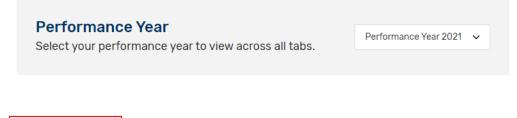


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### 698,731 providers reporting

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### https://qpp.cms.gov/mips/exploremeasures?tab=qualityMeasures&py=2021



Quality Measures	
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Promoting Interoperability Improvement Activities Cost Measures

2021 Quality Measures: Traditional MIPS



55% OF FINAL SCORE

This percentage can change due to <u>Special Statuses</u>, <u>Exception Applications</u> or reweighting of other performance categories.

Measure Type		Specialty Measure Set		Collection Type	
All	~	All	~	All	~
In "Your Lis	t" of Quality Meas	ures			Clear all fil

### https://qpp.cms.gov/mips/exploremeasures?tab=qualityMeasures&py=2021

#### **Performance Year**

Performance Year 2021 🗸

Select your performance year to view across all tabs.

# Measure Type Specialty Measure Set Collection Type All All All In "Your List" of Quality Measures Clear all filters

Hide filters

Note: This tool does not include these QCDR Measures (XLSX)

Q

1 Quality Measures | ↓ Download 1 measures

Quality Measures

Promoting Interoperability Improvement Activities Cost Measures

# 2021 Quality Measures: Traditional MIPS

#### UPDATED 55% OF FINAL SCORE

This percentage can change due to <u>Special Statuses</u>, <u>Exception Applications</u> or reweighting of other performance categories.

#### Pneumococcal Vaccination Status for Older Adults

Percentage of patients  $65\, {\rm years}$  of age and older who have ever received a pneumococcal vaccine.

ADD TO LIST

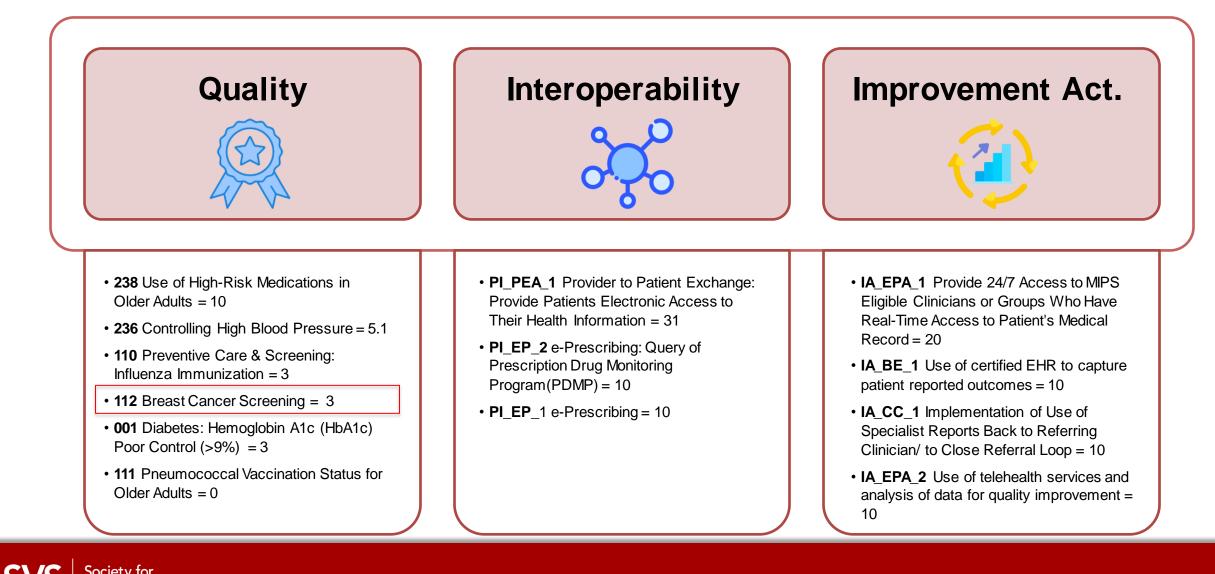
Collection Type and Documentation Medicare Part B claims measures <u>Specifications (PDF)</u> C Electronic clinical quality measures (eCQMs) <u>Specifications</u> C MIPS clinical quality measures (MIPS CQMs) <u>Specifications (PDF)</u> C

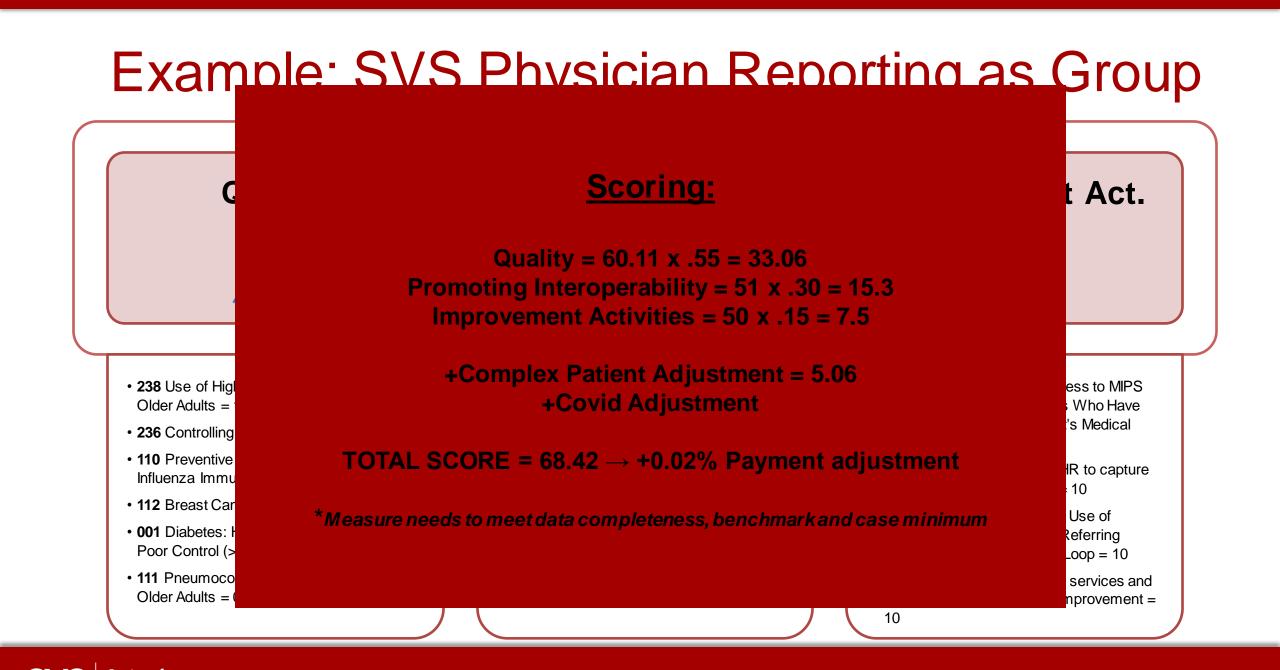
#### Hide Details

111

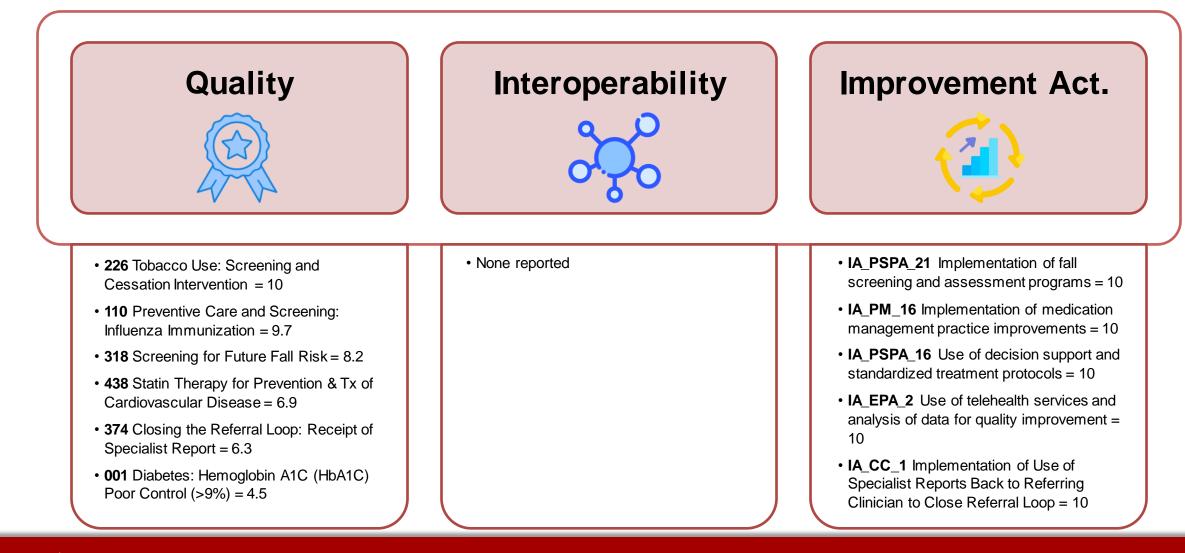
<b>Measure Numbers</b> CMS eCQM ID: CMS127v9	NQS Domain Community/Population Health	Specialty Measure Set Allergy/Immunology
NQF eCQM ID: None NQF: None	Community/Population Realth	Cardiology Family Medicine
Quality ID: 111		Internal Medicine
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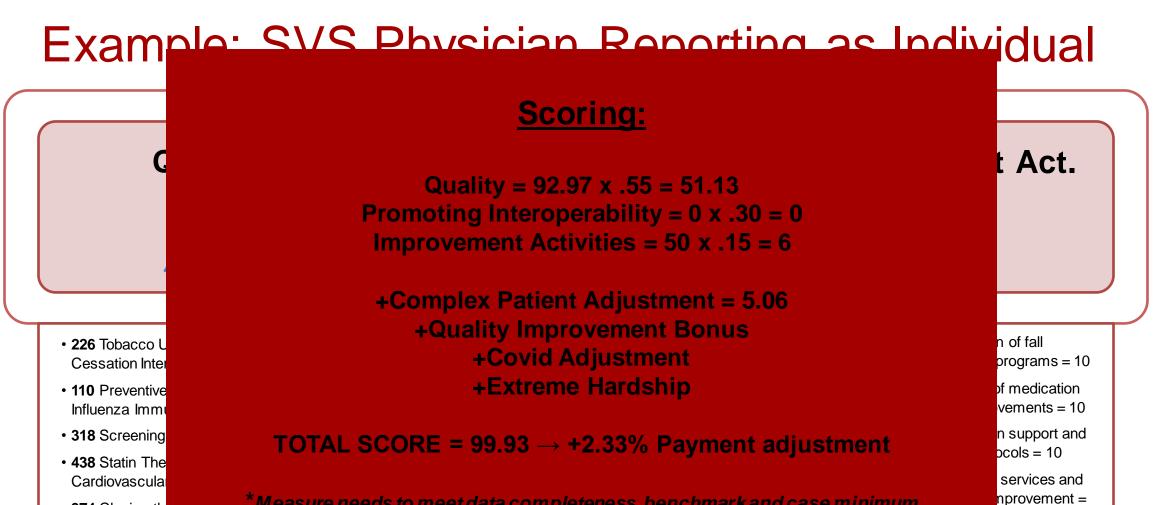
# Example: SVS Physician Reporting as Group





# Example: SVS Physician Reporting as Individual





- 374 Closing th Specialist Rep
- **001** Diabetes: Poor Control (>9%) = 4.5

\*Measure needs to meet data completeness, benchmark and case minimum

Use of

opecialist reports back to Referring

Clinician to Close Referral Loop = 10

# Vascular Surgery Quality Measures

- 047 Advance Care Plan
- 374 Closing the Referral Loop: Receipt of Specialist Report
- 236 Controlling High Blood Pressure
- 130 Documentation of Current Medications in the Medical Record
- 441 Ischemic Vascular Disease
- 358 Patient-Centered Surgical Risk Assessment and Communication
- 021 Perioperative Care: Selection of Prophylactic Antibiotic
- 023 Venous Thromboembolism (VTE) Prophylaxis
- 128 Body Mass Index (BMI) Screening and Follow-Up Plan
- 317 Screening for High Blood Pressure and Follow-Up Documented
- 226 Tobacco Use: Screening and Cessation Intervention

#### 334 Rate of Carotid Artery Stenting (CAS) for Asymptomatic Patients, Without Major Complications (Discharged to Home by Post-Operative Day #2)

- 260 Rate of Carotid Endarterectomy (CEA) for Asymptomatic Patients, Without Major Complications (Discharged to Home by Post-Operative Day #2)
- 259 Rate of Endovascular Aneurysm Repair (EVAR) of Small or Moderate Non-Ruptured Infrarenal Abdominal Aortic Aneurysms (AAA) without Major Complications (Discharged to Home by Post-Operative Day #2)
- 258 Rate of Open Repair of Small or Moderate Non-Ruptured Infrarenal Abdominal Aortic Aneurysms (AAA) without Major Complications (Discharged to Home by Post-Operative Day #7)
- 357 Surgical Site Infection (SSI)
- 402 Tobacco Use and Help with Quitting Among Adolescents
- 420 Varicose Vein Treatment with Saphenous Ablation: Outcome Survey

**Outcome Measures** 

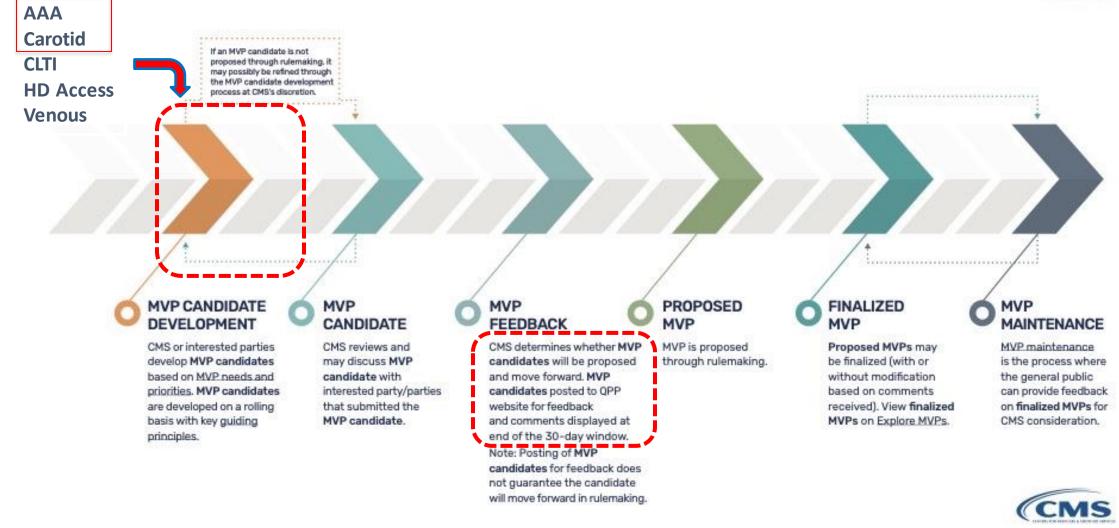
#### Process Measures Structural Measures

# **Types of Quality Measures**

- Structural Measures: Give consumers a sense of a health care provider's capacity, systems, and processes to provide high-quality care.
  - Whether the health care organization uses electronic medical records or medication order entry systems.
  - The number or proportion of board-certified physicians.
- Process Measures: Indicate what a provider does to maintain or improve health, either for healthy people or for those diagnosed with a health care condition. These measures typically reflect generally accepted recommendations for clinical practice.
  - The percentage of people receiving preventive services (such as mammograms or immunizations).
  - The percentage of people with diabetes who had their blood sugar tested and controlled.
- Outcome Measures: Reflect the impact of the health care service or intervention on the health status of patients.
  - The percentage of patients who died as a result of surgery (surgical mortality rates).
  - The rate of surgical complications or hospital-acquired infections

### MVP Development Process (>1 year)

### Quality Payment





# Proposed SVS MVPs – Quality Measures

### Symptomatic Carotid (n=12)

- 047 Advance Care Plan
- 130 Documentation of current medications in the medical record
- 226 Tobacco use: Screening and cessation intervention
- 236 Controlling High Blood Pressure
- 321 CAHPS for MIPSClinician/Group Survey
- 355 Unplanned reoperation within the 30-day postoperative period
- 356 Unplanned hospital readmission within 30 days of principal procedure
- 358 Patient-Centered Surgical Risk Assessment and communication
- 374 Closing the Referral Loop: Receipt of Specialist Report
- 441 Ischemic Vascular Disease all or none outcome measure
- 438 Statin therapy for the prevention and treatment of cardiovascular disease
- 487 Screening for social drivers of health

### Asymptomatic AAA (n=10)

- 047 Advance Care Plan
- 130 Documentation of current medications in the medical record
- 226 Tobaccouse: Screening and cessation intervention
- 236 Controlling High Blood Pressure
- 259 Rate of Endovascular Aneurysm Repair (EVAR) of Small or Moderate Non-Ruptured Infrarenal Abdominal Aortic Aneurysms (AAA) without Major Complications (Discharged to Home by Post-Operative Day #2)
- 355 Unplanned Reoperation within the 30 Day Postoperative Period
- 356 Unplanned hospital readmission within 30 days of principal procedure
- 357 Surgical Site Infection
- 438 Statin therapy for the prevention and treatment of cardiovascular disease
- 487 Screening for social drivers of health

### **NEED TO REPORT ON 4**

# Proposed SVS MVPs – Pop. Health Measures

### Symptomatic Carotid (n=2)

- 479 Hospital-Wide, 30-Day, All-Cause Unplanned Readmission (HWR) Rate for the Merit-Based Incentive Payment Program (MIPS) Eligible Clinician Groups
- 484 Clinician and Clinician Group Risk-standardized Hospital Admission Rates for Patients with Multiple Chronic Conditions

### Asymptomatic AAA (n=2)

- 479 Hospital-Wide, 30-Day, All-Cause Unplanned Readmission (HWR) Rate for the Merit-Based Incentive Payment Program (MIPS) Eligible Clinician Groups
- 484 Clinician and Clinician Group Risk-standardized Hospital Admission Rates for Patients with Multiple Chronic Conditions

### **NEED TO REPORT ON 1**

# Proposed SVS MVPs – Improvement Measures

### Symptomatic Carotid (n=15)

- IA\_PM\_21 Advanced Care Planning
- IA\_PM\_2 Anticoagulant Management Improvement
- IA\_BE\_1 Use of certified EHR to capture patient reported outcomes
- IA\_BE\_4 Engagement of patients through implementation of improvements in patient portal
- IA\_BE\_12 Use evidence-based decisions aids to support shareddecision making
- IA\_PM\_11 Regular review practices in place on targeted patient population needs
- IA\_PM\_15 Implementation of episodic care management practice improvement
- IA\_PSPA\_19 Implementation of formal quality improvement methods, practice changes or other practice improvement processes
- IA\_AHE\_3 Promote use of patient-reported outcome tools
- IA\_AHE\_6 Provide education opportunities for new clinicians
- IA\_EPA\_1 Provide 24/7 access to MIPS eligible clinicians or groups who have real-time access to patient's medical record
- IA\_EPA\_2 Use of telehealth services that expand practice access
- IA\_CC\_2 Implementation of improvements that contribute to more timely communication of test results
- IA\_BMH\_2 Tobacco use
- IA\_MVP Practice-Wide Quality Improvement in MIPS Value Pathways

### Asymptomatic AAA (n=10)

- IA\_PM\_21 Advanced Care Planning
- IA\_PM\_2 Anticoagulant Management Improvement
- IA\_PM\_16 Implementation of medication management practice improvements
- IA\_EPA\_3 Collection and use of patient experience and satisfaction data on access
- IA\_CC\_1 Implementation of Use of Specialist Reports Back to Referring Clinician or Group to Close Referral Loop
- IA\_CC\_2 Implementation of improvements that contribute to more timely communication of test results
- IA\_AHE\_3 Promote Use of Patient-Reported Outcome Tools
- IA\_AHE\_6 Provide Education Opportunities for New Clinicians
- IA\_EPA\_1 Provide 24/7 Access to MIPS Eligible Clinicians or Groups Who Have Real-Time Access to Patient's Medical Record
- IA\_MVP Practice-Wide Quality Improvement in MIPS Value Pathways

### **NEED TO REPORT ON 1 or 2**

# Proposed SVS MVPs – Cost Measures

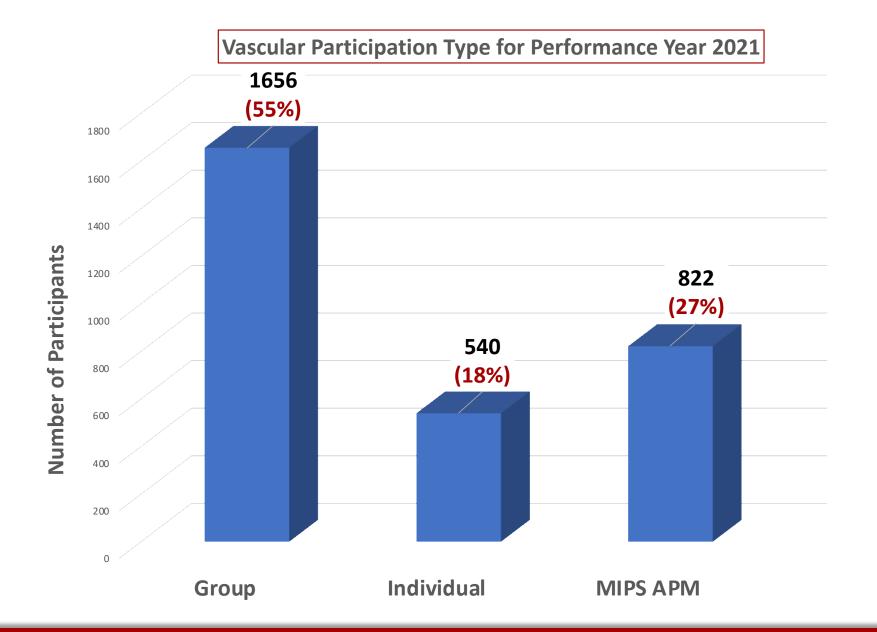
### Symptomatic Carotid (n=1)

 MSPB\_1 Medicare Spending Per Beneficiary (MSPB) Clinician

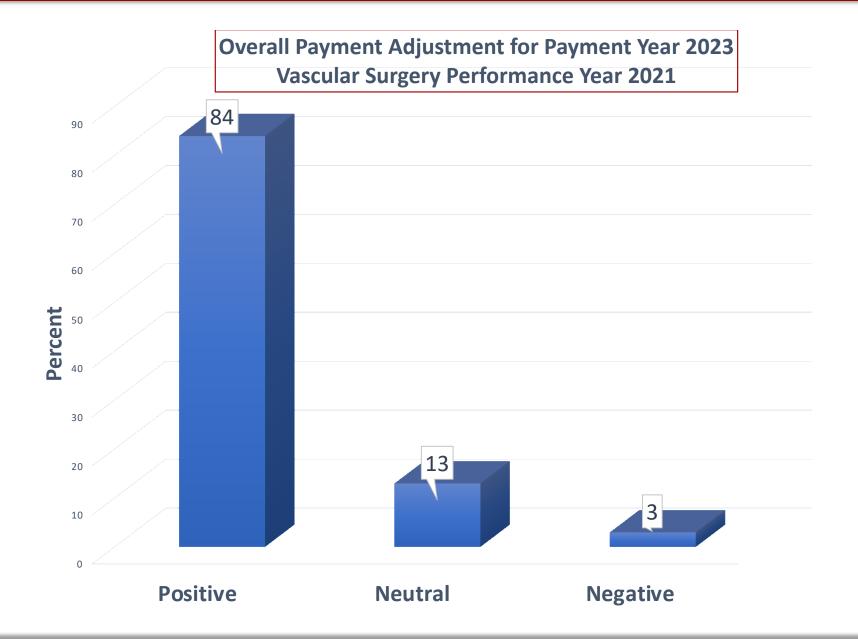
### Asymptomatic AAA (n=1)

 MSPB\_1 Medicare Spending Per Beneficiary (MSPB) Clinician

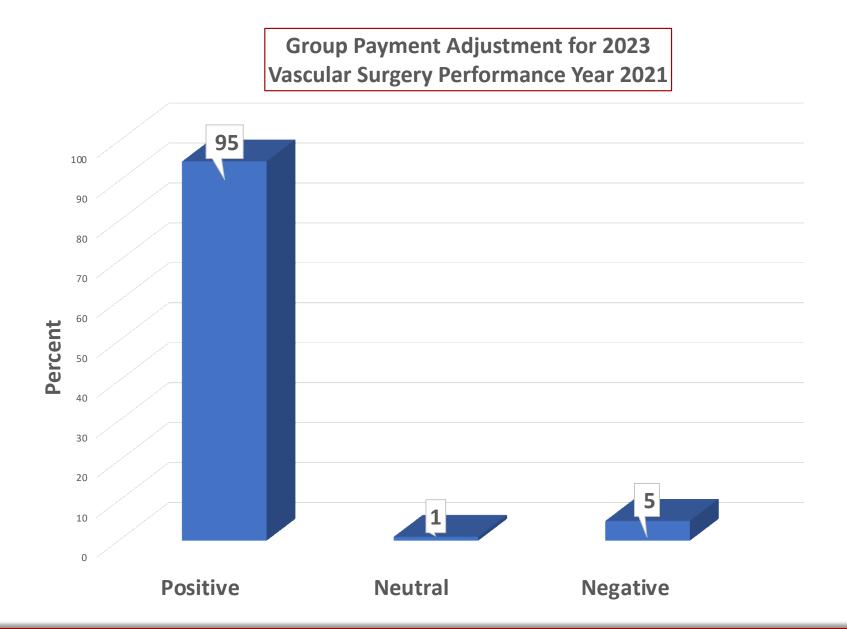
### **DATA SUBMISSION NOT REQUIRED**





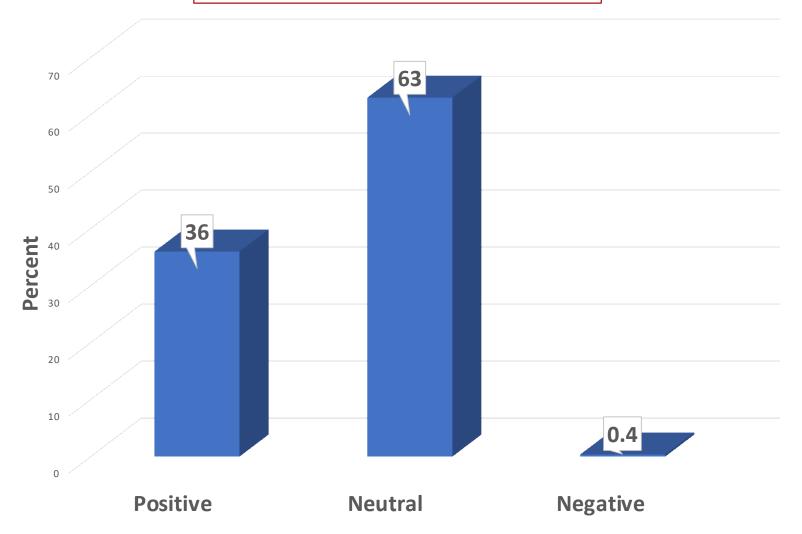






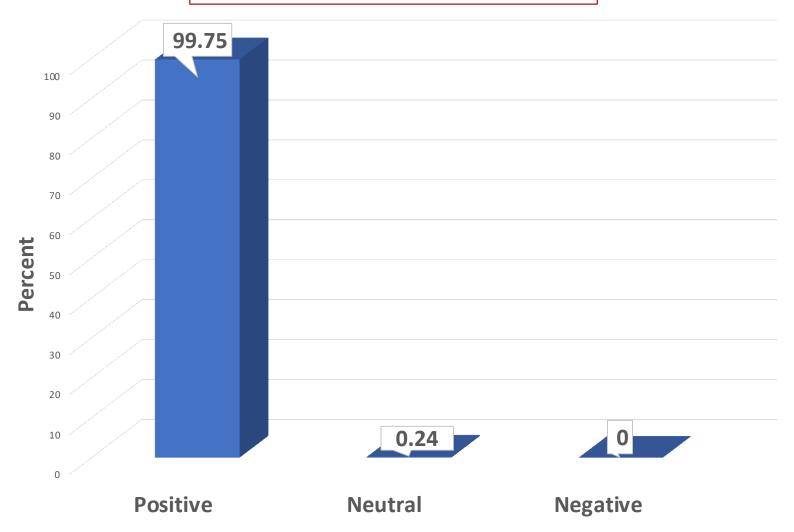


Individual Payment Adjustment 2023 Vascular Surgery Performance Year 2021





MIPS APM Payment Adjustment in 2023 Vascular Surgery Performance Year 2021





# Looking Forward

- Goal = maximize SVS member performance as much as possible
  - Ensure adoption of favorable vascular MPV(s)
  - Develop / test additional quality measures
  - Be involved in development of additional cost measures
  - Education members on how to track (and improve) their performance

Meeting CMS requirements: quality improvement

Jessica Simons, MD Ashley Vavra, MD, MS

On behalf of the SVS Quality Improvement Committee



## Disclosures

#### none

# **Demonstrating Quality Care**

- CMS is already adjusting payments based on providers' reporting of quality care:
  - Quality measures
  - Improvement activities



# **Demonstrating Quality Care**

The bar for getting a positive reimbursement adjustment is likely to get higher in the future

The role that we play in attaining a positive adjustment is likely to increase in the future

# What is the role of the QIC?

- The SVS Quality Improvement Committee is a relatively young committee
- We seek to support SVS members who are trying to engage in Quality Improvement initiatives

Jessica Simons, MD, MPH – <i>Chair</i>	Angela Kim, MD
Ashley Vavra, MD - Vice-Chair	Young Kim, MD
Hasan Aidailami, MD	Samantha Minc, MD
LeAnn Chavez, MD	Maham Rahimi, MD
Michael Costanza, MD	Rebecca Scully, MD
Carlos Hinojosa, MD	Mel Sharafuddin, MD
Andrew Hoel, MD	M. Sheehan, MD
Jason Johanning, MD	Mrinal Shukla, MD
Adam Johnson, MD, MPH	Eleftherios Xenos, MD

# **QPMC & QIC: complementary work**

- The QPMC is working hard to develop measures that support high-quality valuebased care
  - QPMC helps SVS members know what they need to do to demonstrate quality care to CMS
- The QIC helps guide surgeons on how to execute quality improvement projects
  - QIC helps SVS members figure out how to achieve a desired level of quality



## Current state

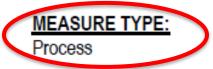
### Payment adjustment range: -9% to +2.34%

- Several different quality measures and improvement activities are reported across the specialty
- Some common ones were identified

# CMS Quality Measure #438

Quality ID #438: Statin Therapy for the Prevention and Treatment of Cardiovascular Disease

#### 2023 COLLECTION TYPE: MIPS CLINICAL QUALITY MEASURES (CQMS)



#### DESCRIPTION:

Percentage of the following patients - all considered at high risk of cardiovascular events - who were prescribed or were on statin therapy during the measurement period:

- All patients who were previously diagnosed with or currently have a diagnosis of clinical atherosclerotic cardiovascular disease (ASCVD), including an ASCVD procedure; OR
- Patients aged ≥ 20 years who have ever had a low-density lipoprotein cholesterol (LDL-C) level ≥ 190 mg/dL or were previously diagnosed with or currently have an active diagnosis of familial hypercholesterolemia; OR
- Patients aged 40-75 years with a diagnosis of diabetes.

# CMS Quality Measure #438

Quality ID #438: Statin Therapy for the Prevention and Treatment of Cardiovascular Disease

2023 COLLECTION TYPE: MIPS CLINICAL QUALITY MEASURES (CQMS)

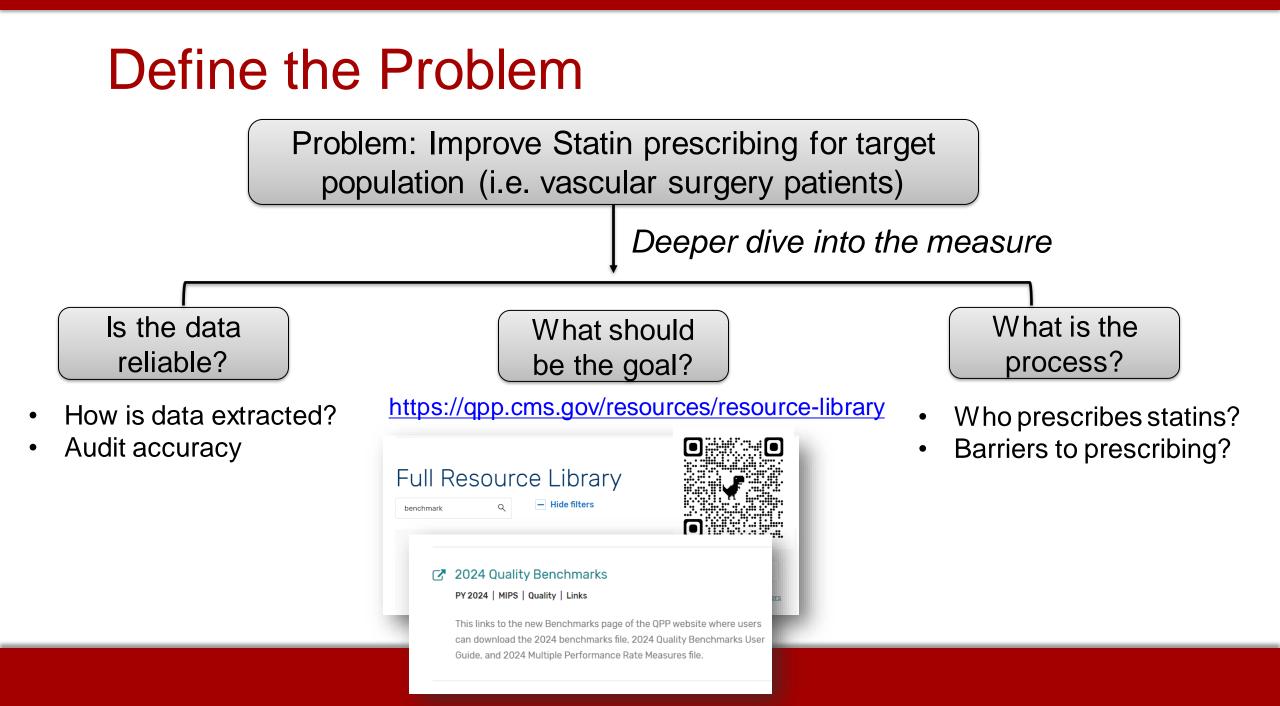
### So, let's say we want to report on this measure. How would we go about maximizing this percent?

nypercholesterolentia, Orc

Patients aged 40-75 years with a diagnosis of diabetes.

## Quality Improvement for CMS Measure 438

- Define the Problem
- Build a Team
- Define the change
- Implement the change
- Evaluate impact



### Build a Team

#### Champion

Subject matter expertise

#### Keys to Success

- Motivated
- Credibility with team

**Project Manager** 

• QI or PI expertise is helpful

- Availability
- System knowledge

Team Members

- Front line: data extraction, prescribers
- Executive sponsor: hospital, clinic leadership
- Involved in the process
- Help get things done

## Define the Change

Problem  $\rightarrow$  Smart Aim: Improve Statin prescribing for vascular surgery patients to >90% within 1 year

- Areas for improvement:
  - Physicians uncomfortable with dosing
  - Physicians forget to documentation of prescribing or if contraindicated
  - Surgeons don't want to follow-up lipid panel
- Utilize existing workflows  $\rightarrow$  EMR
  - Orderset for dosing and labwork
  - Templated note (documents prescribing and contraindications)
  - Templated letter to PCP

## Implement the Change

- Create a timeline:
  - Go live date
  - When and how to reassess (ex. 3 month intervals)
- Prepare your team for change
  - Review proposed changes in advance
  - Assess proposed barriers
  - Develop a communication plan
- Identify roles and responsibilities of team members for:
  - reviewing and communicating data
  - Assessing when to change/ammend interventions

### Assess the Impact

Success  $\rightarrow$  Statin prescribing for vascular surgery patients to >90% within 1 year of go live

Confirm change is happening

Assess orderset and template use

- Revision of goal and definition of success frequently need to be revisited (repeat the process)
- Communicate, communicate, communicate

# Making Change Stick

- Communicate and celebrate
- Set team expectations
- Be kind, change is hard
- Embrace the chaos

"Planned change in such a [health] system is difficult because it is dynamic: nothing stands still while we intervene."

- Riley et al. Systems thinking and dissemination and implementation research

## Resources

- 2021 CMS QPP Experience Report

   MACRA, QPP Resources | Society for Vascular Surgery
- SVSQuality@vascularsociety.org

How Medicare Quality Requirements Will Impact Reimbursement, and Practical Tips to Successfully Meet Them

## Thank You For Your Participation!

