

## Part B Insider (Multispecialty) Coding Alert

### Incentive Programs: CMS Reps: Deadlines Fast Approaching to Avoid Pay Cuts

#### Act now to avoid penalties if you haven't already started participating

Your practice has most likely already taken as many pay cuts as you're willing to endure, which is why you shouldn't hesitate to enroll in the PQRS group practice reporting and EHR incentive programs, said CMS representatives during a Sept. 16 Open Door Forum.

#### Look for Notifications of PQRS Penalties

The 2013 PQRS and e-prescribing incentive program feedback reports are currently available if you're interested in reviewing yours, said CMS's **Christina Phillips** during the call. "There are two different types of reports you can access—one is the NPI identifier level report, the other is a PIN-level report," Phillips said. "Group practices who participated in PQRS during 2013 using the GPRO option can access their feedback reports through the 2013 Quality and Resource Use reports," she added. An authorized representative will have to sign in to access the report. For more information on the feedback reports, visit the PQRS website at [www.cms.gov/pqrs](http://www.cms.gov/pqrs).

In addition, Phillips said, starting in late October or early November, CMS will send notification letters to providers who are subject to the 2015 PQRS payment adjustment. Whether an eligible professional (EP) is subject to this penalty (which equals 1.5 percent of your Medicare fee-for-service payments) will depend on the reporting you did in 2013, "so it is important that you access your feedback reports and determine your level of reporting, and again you will receive a notification via mail regarding whether you're subject to that PQRS adjustment in late October or early November," she said.

**Down the pike:** If you are notified that you'll be facing the 1.5 percent PQRS penalty in 2015, keep in mind that the penalty increases to two percent in 2016.

If your group practice is hoping to avoid that two percent hit, you do have options, said CMS's **Sabrina Ahmed** during the call. "We would like to remind all group practices that the deadline for groups to register to participate in the 2014 PQRS group practice reporting option, otherwise known as GPRO, is quickly approaching—it's Sept. 30, 2014 at 11:59 pm EST."

"In 2016, Medicare will apply a modifier to physician payments under the Fee Schedule for physicians in groups with 10 or more eligible professionals," Ahmed said. "2014 is the performance period for the value modifier that will be applied in 2016. Groups with 10 or more EPs in 2014 can avoid the automatic negative two percent value modifier payment adjustment in 2016 by participating in the PQRS GPRO in 2014 and meeting the satisfactory reporting criteria."

Groups can participate in the 2014 GPRO by selecting one of the GPRO reporting mechanisms available, which are registry, EHR or the web interface option (which is only available for groups with 25 or more EPs). Groups can also use one of these three reporting mechanisms by using the CAHPS survey if they have 25 or more EPs, Ahmed added.

#### EHR Has Penalties As Well

When it comes to the EHR incentive program, the clock is ticking to get in on those incentives as well, said CMS's **Elizabeth Holland** during the call. "Those providers that are in their first year of participation in the Medicare EHR incentive program need to attest by Oct. 1, 2014 to avoid a payment adjustment in 2015," she said. "All providers, even those in their first year, have until Feb. 28, 2015 to attest and earn a Medicare incentive for 2014, which is the last date to attest and earn an incentive, because you cannot initiate the incentive program for Medicare in program year 2015." If



you do not successfully demonstrate meaningful use, you'll face a one percent adjustment in your Medicare payments in January, Holland said.

**Hardship:** Providers did have the opportunity to file for a hardship exception to avoid the penalty, the deadline for which was July 1. "We received over 40,000 applications and over 90 percent of them were approved," Holland said. "Letters are being sent right now to providers who filed a hardship exception application to let them know our final determination on those applications and we expect all letters to be sent by the end of September."

If you will be facing the Medicare payment adjustment under the EHR program, CMS will send you a letter to that effect in December. "The letter will explain that there is a reconsideration process," Holland said. "We'll post more on that later this year, but I believe the deadline will be Jan. 31, 2015 for filing that reconsideration."