

Part B Insider (Multispecialty) Coding Alert

Part B Payment: Public Input Affects CMS Decision to Offer MACRA QPP Plan Options

As Jan. 1 approaches, CMS provides a Quality Payment Program pacing guide.

With the final MACRA Quality Payment Program (QPP) rule slated to come out on Nov. 1, 2016, providers everywhere are worried about new forms, requirements, and payments. As add-ons and innovations continue to stack up, addressing the Medicare shift from fee-for-service care to quality, patient-focused care, clinicians have weighed in on these changes with both appreciation and concern.

Relief Comes to MACRA Adopters

CMS reveals in a new outline for the upcoming MACRA rollout that it is listening to the public's outcry. Though the plan to launch the QPP is still in place, CMS is offering up some options for various levels of immersion with provider trepidation taken into account.

"With the Quality Payment Program set to begin on January 1, 2017, we wanted to share our plans for the timing of reporting for the first year of the program," said **Andy Slavitt**, CMS administrator, in a Sept. 8, 2016 blog post. "In recognition of the wide diversity of physician practices, we intend for the Quality Payment Program to allow physicians to pick their pace of participation for the first performance period that begins January 1, 2017."

The Choice Is Yours

Background. With different components like practice size, location, patient load, and specialty factoring into the MACRA equation, providers have repeatedly stressed the worry that introducing the QPP too soon could be catastrophic. As we mentioned in an earlier issue (Part B Insider, vol. 17., no. 25), Slavitt, in his July 2016 testimony to Congress on the implementations and how they would enhance Medicare, suggested that CMS would approach the deadline slowly, giving QPP participants alternatives for investing in such a detailed and pervasive health care plan.

Four options to choose from. Whether you are all-in or want to test the waters, there is an entry point for you, particularly if you are worried about how this will affect your bottom line. "During 2017, eligible physicians and other clinicians will have multiple options for participation," Slavitt explains. "Choosing one of these options would ensure you do not receive a negative payment adjustment in 2019. These options and other supporting details will be described fully in the final rule."

Here's a brief overview of the four opportunities for MACRA involvement:

- The lowest point of QPP adoption allows providers to give "some data" without any negative financial repercussions, but with the idea that they will ramp up their participation in the following years after testing the MACRA waters.
- The second opportunity involves a partial year of involvement in the program with a start date after Jan. 1, 2017. Interested clinicians would offer their approach for a portion of the calendar year to the quality measures, CEHRT adoption, and improvements with the option of a "small positive payment adjustment."
- For those ready on day one, the third course of action offers a full year of involvement in the QPP. Eligible providers would present their data and pick from the list of the plan requirements and can expect a "modest

payment adjustment" if the measures are met.

- At the highest echelon of MACRA's QPP adoption is engagement in the Advanced Alternative Payment Models (APMs). Advanced APMs would cover participation in programs like CMS Innovation Models like the Comprehensive Primary Care Plus (CPC+) or "the Medicare Shared Savings Tracks 2 and 3," which require a significant level of involvement in the push for quality patient care; thus, affording the participants who "qualify, a 5 percent incentive payment in 2019."

The AMA Commends CMS Changes

Since the QPP and its provisions were first introduced in April, the American Medical Association (AMA) has been at the forefront of the commentary, offering advice to CMS on the physician's side to ensure a smoother transition for all parties involved.

"By adopting this thoughtful and flexible approach, the Administration is encouraging a successful transition to the new law by offering physicians options for participating in MACRA. This approach better reflects the diversity of medical practices throughout the country," said **Andrew W. Gurman MD**, AMA president in a Sept. 8, 2016 AMA press release. "This is the flexibility that physicians were seeking all along, and we are looking forward to working with Acting Administrator Slavitt and the administration on other efforts to get MACRA off to a successful start."

Looking ahead. Whether your practice is planning on dipping your toes in or diving head first, CMS is forging ahead with patient-centered care as its focus on the Medicare horizon. Consider the options and look for more news ahead in the days leading up to the new year.

To take a closer look at the QPP options, read <https://blog.cms.gov/2016/09/08/qualitypaymentprogram-pickyourpace/> or to read the AMA's comments on the MACRA pacing options, visit <http://www.ama-assn.org/ama/pub/news/news/2016/2016-09-08-ama-praises-administration-macra-changes.page>.