Part B Insider (Multispecialty) Coding Alert

Quality Payment Program: Collect MIPS Points for COVID-19 Clinical Trial Submissions

Tip: Streamline your reporting with open source tools.

Though the pandemic has likely impacted your 2020 Quality Payment Program (QPP) data collections, you may still be able to get credit for frontline work. The feds recently added a new COVID-19 clinical trials measure, which is a potentially attractive new option for Part B providers.

Background: On April 20, the Centers for Medicare & Medicaid Services (CMS) added a new submission option for Merit-Based Incentive Payment System (MIPS) participants. The update encourages MIPS-eligible clinicians working on COVID-19 research to use that data to attest under the Improvement Activities (IA) category and offers higher-than-usual weight to the submission. The clinical trial attestations would garner providers like physicians, physician assistants, nurse practitioners, and others 20 points out of the 40 possible under the IA category, relates an April 28 "Dear Clinician" letter from the agency.

See How This Option Impacts Overall Scoring

Remember, MIPS is made up of four separate performance categories - Cost, IA, Quality, and Promoting Interoperability (PI) - that are each assigned a specific weight. Then those category points are combined for a total MIPS final score, which determines the positive or negative adjustment to your Medicare incentive reimbursement.

Refresher: Here's a breakdown of the MIPS 2020 performance period/2022 payment year numbers, including category weights and threshold totals:

- **Cost:** For performance year (PY) 2020, Cost is weighted at 15 percent, but it may increase in 2021, especially with the performance threshold reweighted at 60 points.
- **Improvement Activities:** For PY 2020, IA remains steady at 15 percent.
- **Quality:** During the 2020 PY, Quality is weighted at 45 percent, but you may see this increased in 2021 along with Cost.
- **Promoting Interoperability:** PI, the technical component of MIPS, is weighted at 25 percent.
- **Performance threshold:** This is set at 45 points for PY 2020.
- **Exceptional performance threshold:** This stands at 85 points, and according to the final rule on QPP 2020, it will stay at 85 points for 2021.

"By law, the Cost and Quality performance categories must be equally weighted at 30 percent beginning in the 2022 performance period," according to the PY 2020 final rule fact sheet.

Now: With the addition of the new COVID-19 Clinical Trials (IA_ERP_3) option, interested MIPS providers will be able to capture half their IA points in one activity to reach the 15-percent category total. This offering aligns with agency efforts to provide relief for burdened clinicians struggling with the constraints of the pandemic and trying to compile measures for 2020 reporting.

According to the details, "clinicians must attest to participation in a COVID-19 clinical trial utilizing a drug or biological product to treat a patient with a COVID-19 infection and report their findings through a clinical data repository or clinical data registry for the duration of their study," advises the "Dear Clinician" letter. An example of an acceptable clinical trial

might be a provider's participation in National Institutes of Health (NIH) research or through a clinical data repository, "such as Oracle's COVID-19 Therapeutic Learning System," CMS suggests.

IT input: The agency also encourages MIPS-eligible clinicians to utilize open source data tools for uploading clinical trials' submissions materials as the technology has a two-fold benefit. Not only does it show up more quickly in the system, but the research will improve "care delivery and the ability to treat COVID-19 patients" in the field, stresses the release.

"CMS is supporting efforts of researchers to obtain solid, actionable data to accelerate the development of new treatments and our understanding of the coronavirus," said CMS administrator **Seema Verma** in a release. "Today's action encourages clinicians to report data that will help us monitor the spread of the virus, find innovative medical solutions, and unleash scientific discovery as we seek to overcome this terrible disease."

Get Ready for MIPS Audits

As Medicare continues to churn out COVID-19-related administrative rollbacks for providers, you may be lulled into thinking that the feds aren't focused on data, measures, and compliance. A recent Quality Payment Program (QPP) update suggests the agency is still going forward with validation audits in 2020.

Details: With none of the typical Centers for Medicare & Medicaid Services (CMS) fanfare, the agency updated its 2020 Merit-Based Incentive Payment System (MIPS) Data Validation information on April 27. The hefty six-part breakdown offers a spreadsheet; Promoting Interoperability (PI) files on criteria, changes, and deletions; and two Improvement Activities (IA) files related to changes and criteria.

If a MIPS file audit is on your radar and you want to prepare yourself for just-in-case scenarios, the criteria offerings give advice on what documentation CMS is looking for in the file. The MIPS IA and PI changes' checklists show the updates and deletions with 2020 timeline examples.

Note: Find the 2020 MIPS Data Validation zip file in the QPP resource library at https://qpp.cms.gov/about/resource-library.

Resources: Read the "Dear Clinician" letter at www.cms.gov/files/document/covid-cms-letter-qpp-mips-clinicians.pdf and reach the clinical trials database at https://clinicaltrials.gov.