

## Health Information Compliance Alert

### Compliance: Be MACRA Ready: Navigate the Certified Health IT Product List

**Starting Jan. 1, your payment might depend on the quality of your EHR.**

Despite the almost non-stop cyber chatter devoted to MACRA, many providers are still unaware of the changes slated for Jan. 1, 2017 with the shift to quality-based, patient-centered care. With a big portion of your MIPS score under the new QPP compiled from your adoption of new technical standards under ACI, you'll want to ensure that your software is up-to-date, user- and patient-friendly, and ready to roll from the get-go.

#### **This Is Your Wake-Up Call**

**Background.** Long before MACRA's bipartisan ideologies were at the forefront of the industry, practitioners had complained that healthcare had become more about the paperwork and less about the patient. The QPP and its options under MIPS and advanced Alternative Payment Models (APMs) aim to revitalize the doctor-patient relationship, putting the care of people first while making the process of practicing medicine more efficient.

**Possible sanctions.** Unfortunately, quite a few Medicare providers are in the dark or haven't been closely following the changes that originated with the QPP introduction in April 2016. Many of those late to the MU table are the same ECs lagging behind on the mandates under MACRA's final rule, which came out last month. (Read the highlights of the final rule here: [https://qpp.cms.gov/docs/QPP\\_Executive\\_Summary\\_of\\_Final\\_Rule.pdf](https://qpp.cms.gov/docs/QPP_Executive_Summary_of_Final_Rule.pdf).)

This is a problem, and those not participating will be financially penalized. "If you don't send in any 2017 data, then you receive a negative 4 percent payment adjustment [for your 2019 pay]," CMS's QPP website states. You can take a look at the link and an explanation of this penalty here: <https://qpp.cms.gov>.

"A recent survey performed by The Physicians Foundation found that only 20 percent of physicians are familiar with MACRA," says **Sarah Warden, Esq** of Greenspoon Marder in Ft. Lauderdale, Florida. "That statistic is troubling considering the amount of money at stake."

**Revenue lost.** It is fiscally risky over the long haul for those refusing to adopt the new payment regime and accept the new quality standards. "CMS is not providing leniency for future years, and the negative adjustments increase from 4 percent in 2019 to 9 percent in 2022 and onward," Warden explains. "Depending on a practice's payer mix and profit margins, the negative adjustments will be a huge wake-up call for practices that are not reporting under the Quality Payment Program or implementing the necessary measures and processes for success."

#### **Make Sure You Are on Track**

Since 25 percent of your MIPS composite score comes from the measures you report under ACI, utilizing CEHRT from approved vendors is essential to maximizing your profits. The ONC offers providers a valuable resource with its Certified Health IT Product List (CHPL).

**What exactly is the CHPL?** It is defined as "a comprehensive and authoritative listing of all certified Health Information Technology which has been successfully tested and certified by the ONC Health IT Certification program," the ONC website states. But, the CHPL portal offers much more than just a list of available certified EHRs for physicians to look at. There is easy access to helpful tools through various links that the HHS offers, ensuring that the products you use and vendors you utilize are certified and up-to-date.

For example, the CHPL site lets providers compare the EHRs they currently use with others to see if they are using the correct software for their practice size and specialty in addition to managing costs. Here is a short list of what you can do on the CHPL resource site:

- Check to make sure your current EHR and vendor have been "tested by an Accredited Testing Laboratory (ATL) and certified by an ONC-Authorized Certification Body (ONC-ACB)."
- Compare your products with new CEHRT that include the latest HHS updates and HIPAA-ready.
- Create a CMS EHR Certification ID.
- Disclose problems, glitches, vendor issues, and more through the provider complaint link.

### **Slavitt Weighs in on CEHRT**

The promise of MACRA has been high on the CMS checklist this past six months, and while many providers have balked at the changes, others are hopeful that health IT options will be less obtrusive, more affordable, and user-friendly.

"MACRA is an opportunity to move the focus away from paperwork and reporting and towards paying for what works. For a variety of reasons, EHRs became an industry before they became a useful tool," **Andy Slavitt**, CMS acting administrator said in a Dec. 1, 2016 blog post. "The technology community must be held accountable by their customers and make room for new innovators and to give clinicians more freedom and more flexibility to focus on their patients, to practice medicine, and deliver better care. We worked alongside physicians to design technology tools and a support center that allows physicians to learn about, access, and even design their involvement in the Quality Payment Program."

**Endnote:** Change is inevitable next year, so knock one thing off your transition list ☐ outline and solidify your practice CEHRT today and be ready on day one for MACRA.

**Resource:** For a closer look at the ONC's Certified Health IT Product List and to access its helpful tools, visit <https://chpl.healthit.gov/#/search>.