

Clinical Integration Educational Series

Impact of MIPS Participation on Clinicians in Track 1 MSSP ACOs



Overview

The Medicare Access and CHIP Reauthorization Act (MACRA) establishes a new clinician reimbursement mechanism with two payment tracks: the Merit-Based Incentive Payment System (MIPS) track and the Advanced Alternative Payment Model (APM) track. In the last two installments in our educational series we reviewed MACRA as well as timing for implementation. This week, we will discuss how participation in a Medicare Shared Savings Program (MSSP) Track 1 Accountable Care Organization (ACO) enables clinicians to receive preferential scoring under MIPS.

As a reminder, payment adjustments under MACRA take effect January 1, 2019, and will be determined using data from two years prior. Therefore, clinician payment in 2019 will be dependent on performance and reporting in 2017.

Preferential MIPS Scoring for Medicare Shared Savings Program Track 1 ACOs

Most of the clinicians in St. Rose Quality Care Network will be reimbursed under the MIPS payment track. MIPS scores clinicians on their performance in the following categories:

MIPS scores clinicians on their performance in the following categories, which differ in weighting and reporting requirements:

1. Quality,
2. Cost,
3. Improvement Activities (such as care coordination and population health management), and
4. Advancing Care Information (use of electronic health records).

Clinicians who are in a Medicare Shared Savings Program Track 1 ACOs benefit from preferential scoring under MIPS. For the 2017 Performance Year, participants in a Track 1 MSSP ACO will automatically receive full credit for the Improvement Activities category, and the category will be more heavily weighted than under the standard MIPS scoring model. Additionally, MSSP ACO participants will not be assessed on the MIPS Cost category for the 2017 Performance Year. These provisions increase clinicians' chances of receiving a higher composite score.

Participants in Track 1 MSSP ACOs also benefit from reduced reporting burden, as the ACO handles much of the data reporting. For most categories, the ACO will report data to CMS. For the Advancing Care Information category, however, MSSP ACO participants will submit data directly to CMS, and the final performance score will be a weighted average of the scores of all ACO participants. Each clinician participating in the ACO will receive the same final performance score.

Performance Category	Category Weight Under Standard MIPS Scoring in 2017	Category Weight for MSSP Track 1 ACO Participants in 2017	Reporting Requirements for MSSP Track 1 ACO Participants
Quality	60%	50%	No additional reporting necessary. ACOs submit quality measures to CMS on behalf of clinicians.
Improvement Activities	15%	20% (MSSP Track 1 ACO participants receive full credit for PY2017)	No additional reporting necessary.
Advancing Care Information	25%	30%	All clinicians, including those in a MSSP ACO must report this category to CMS. Measures are similar to Meaningful Use.
Cost	0% (Will count starting in 2018)	0%	N/A

Preferential MIPS Scoring for Medicare Shared Savings Program Track 1 ACOs

Based on their MIPS composite score, clinicians in MSSP ACOs will receive positive or negative payment adjustments to their Medicare Part B payments. These payment adjustment ranges start at +/- 4 percent in 2019 (**based on the 2017 Performance Year**), and will increase gradually to a maximum of +/- 9 percent in 2022 and beyond. The MIPS payment adjustments are designed to be revenue-neutral for the federal government, meaning that the total revenue in negative payment adjustments that CMS maintains from low performers must equal the total revenue in positive payment adjustments that CMS distributes to high performers. There may be additional funds available for exceptional performers.

This informational series will be distributed every other week to help clinicians stay updated on MACRA and other initiatives. The next topic will be an overview of the Quality category under the Merit-Based Incentive Payment System (MIPS) for Track 1 MSSP ACOs. The MACRA final rule was released on October 14. Given that the law passed with bipartisan support, implementation is expected to continue under the new administration.