Anesthesia MACRA Compliance Cheat Sheet

MACRA Ready

THE BASICS

What is MACRA?

The Medicare Access and Chip Reauthorization Act of 2015 (MACRA) is the legislation that created the Quality Payment Program (QPP). Having replaced the Sustainable Growth Rate, the QPP unites 3 more familiar programs: PQRS, Value Payment Modifier, and Meaningful Use Incentive. It is a system of quality reporting requirements associated with ever increasing penalties and bonuses for eligible providers (i.e. Anesthesiologists and CRNAs.).

Pathways to MACRA Compliance

There are 2 pathways for compliance: Merit-based Incentive Payment System (**MIPS**) or the Alternative Payment System (**APM**). For purposes of this discussion, this document covers the MIPS pathway for reporting on individual providers.

What is Financially at Stake?

At the end of the year, CMS will assign a "MIPS Composite Performance Score" (CPS) ranging from 0-100 to each Anesthesiologist and CRNA. The higher your individual score, the more money you can earn.

If your score is <15 for failure to report, then you will be penalized 4% in 2019. As your score rises, your penalty will reduce and positive adjustments of up

to +4% will be possible. Furthermore, providers with CPS > 70 will be deemed "Exceptional Performers" and be eligible to split an additional $500 million bonus pool courtesy of CMS.

These penalties/bonuses will increase every year, in the name of containing costs. Thankfully, it's extremely easy for anesthesia providers to earn a high CPS in 2017, but you need to start now.

How Does it Work?

2017 has been deemed a "Transitional Year" and will be the easiest year to participate. There are 4 components that make up your final 2017 CPS. Because the typical practice of anesthesia is deemed "non-patient facing", the formula for us will be a bit different than other providers in the market places.
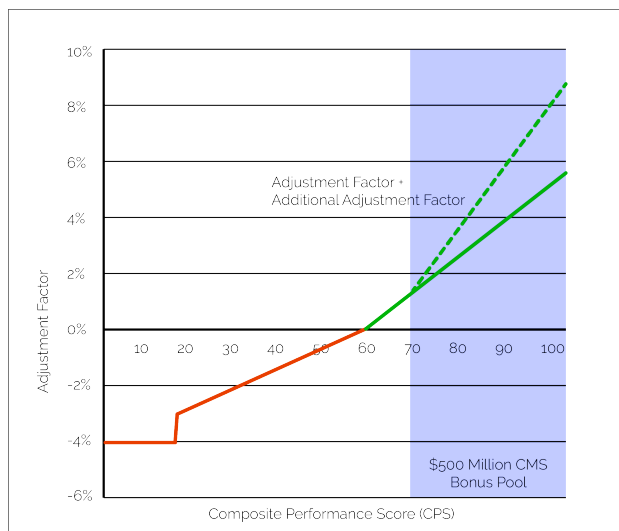
Four Components of Your CPS

- **Quality (85%)**: You need to report on at least 6 Quality Measures for as much of the year as possible.
- **Continuous Process Improvement Activity (CPIA) (15%):** This will be a simple attestation at the end of the year that you made a concerted effort to use quality feedback to improve the patient experience.
- **Use of Certified EHRs (0%)**: Exempt.
- **Cost (0%)**: Exempt.

What is a "Quality Measure"

Here the weeds get thick and the details are very important. CMS controls a widely published list of quality measures referred to as "MIPS Measures", and while there are many such measures, very few of them actually apply to the practice of anesthesia. For instance, "MIPS 426- Handoff in PACU" is designed for anesthesia.

You are much better served if also reporting "Non-MIPS Measures". These become available upon registering with a "Qualified Clinical Data Registry" (QCDR).

The right QCDR will greatly effect your overall costs, complexity for your providers, and feasibility of becoming compliant.

QCDRs tend to put their initials in front of these "Non-MIPS Measures". For example, you may see "ASA 12: Perioperative Mortality Rate" or "ABG 14: Corneal Abrasion". The leading initials typically indicate which QCDR "owns" the measure and is responsible for its annual certification through CMS. There are currently 5 such "Non-MIPS Measures" that must be shared between competing QCDRs.

Continuous Quality Improvement Activities (CPIA)
Compliance for this portion of your score is achieved through simply attesting to the following at the end of the year:

- Use of QCDR data, for ongoing practice assessment and improvements in patient safety.
- Activity must include use of QCDR data for quality improvement.

With Graphium Health, we will make your QCDR data available on a daily basis to improve your patients' experience and improve the quality of your care.

How much does MACRA compliance cost?
Graphium Health offers MACRA compliance with use of our iOS app for *$459 per provider per year.*

This includes QCDR registration fees and does not require an interface with either your facility or billing company.

At no extra charge, we allow for the collection of additional fields to assist you in measuring your operational performance, as well as quality (i.e Ready Times, Turn-over-times, etc.).

Simply download GraphiumEMR in the Apple App Store, and you're ready to start collecting both your quality and operational data.

We also offer a host of other services, including paper-based data collection, Full tablet-based EHR, and EHR interfacing for compliance, charge capture, and operational excellence.

What steps do I need to take?
1. Call us to register you with a QCDR.
2. Decide how to collect your data:
   iOS App or Paper Form
3. Record your quality and operational data.
4. We'll handle the rest.

References:
https://www.qpp.gov

https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Value-Based-Programs/MACRA-MIPS-and-APMs/MIPS-Scoring-Methodology-slide-deck.pdf

Disclaimer:
MACRA Compliance is an ever moving target. We spend our days and nights reading, listening, and discussing the details of a complex program with many bureaucratic moving parts - so that you don't have to. Our mission is to educate our clients and provide clarity in times of confusion. Your success is our success. While we strive each day to be the technology partner of choice for your anesthesia group, we have not yet found a crystal ball. The information above is always subject to change, courtesy of CMS.