



American Hospital Association®

# MACRA: Implementing the Physician Quality Payment Program



**MACRA TRACKER** – *A tool to help evaluate where to invest implementation resources*

## CHANGES TO PROPOSED POLICY UNLIKELY

(Providers should move forward with exploring options for implementation)

- Merit-based Incentive Payment System (MIPS) performance period begins 1/1/17
- Resource use measures likely to remain intact
- Qualifying advanced Alternative Payment Models (APMs) for 2017 measurement period
  - Medicare Shared Savings Program (MSSP) Tracks 2 & 3
  - Next Generation Accountable Care Organizations (ACOs)
  - Comprehensive Primary Care Plus
- Clinicians will be required to use 2014 or 2015 edition certified electronic health record (EHR) technology to satisfy advancing care information (ACI) category
- CMS is unlikely to exclude additional clinicians from MIPS beyond statutory exclusions (low-volume providers, advanced APM participants)

## CHANGES TO PROPOSED POLICY POSSIBLE

(Providers may want to exercise caution before committing time and resources)

- Could be changes to quality measure set in final rule
- Could be changes to clinical practice improvement activities category
- Could see additional alternative payment models qualify as MIPS APMs, impacting performance reporting requirements for clinicians in those models
- AHA has urged CMS to include MSSP Track 1 as an advanced APM in final rule
- ACI reporting period may be shortened to 90 days, instead of a full year
- Clinicians will have a group reporting option, but the final definition of a group may change in the final rule
- Low-volume threshold for MIPS eligibility may change in final rule

## CHANGES TO PROPOSED POLICY LIKELY

(Providers should invest limited resources until final rule is released)

- Predicting financial impact of MIPS is difficult because potential MIPS payment adjustments for 2017 now unclear in light of increased reporting flexibility provided by CMS
- Limited details known about new options to avoid MIPS payment penalties make it difficult for providers to assess which to choose
- ACI reporting requirements likely to change in final rule

For more resources, visit [www.aha.org/MACRA](http://www.aha.org/MACRA)