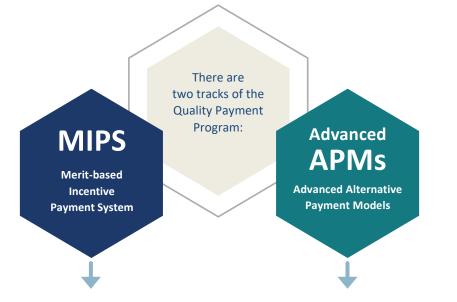


2022 Annual Call for Quality Measures Fact Sheet

Quality Payment Program

The Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) (H.R. 2, Pub.L. 114–10) ended the Sustainable Growth Rate (SGR) formula, which would have resulted in a significant cut to payment rates for clinicians participating in Medicare. In response to MACRA, the Centers for Medicare & Medicaid Services (CMS) created a federally mandated Medicare program, the Quality Payment Program (QPP) that seeks to improve patient care and outcomes while managing the costs of services patients receive from clinicians. Clinicians providing high value/high quality patient care are rewarded through Medicare payment increases, while clinicians not meeting performance standards have a reduction in Medicare payments. Clinicians may participate in the QPP through the following two ways.



If you are a MIPS eligible clinician, you will be subject to a performance-based payment adjustment through MIPS. If you participate in an Advanced APM and achieve QP status, you may be eligible for a 5% incentive payment and you will be excluded from MIPS.

Under the Merit-based Incentive Payment System (MIPS), performance is assessed across four performance categories: quality, cost, improvement activities, and Promoting Interoperability. The performance categories have different "weights" and the scores from each of the performance categories are added together, resulting in a MIPS Final Score. The MIPS payment adjustment assessed for MIPS eligible clinicians is based on the MIPS Final Score.





The following are the performance category weights for the 2022 performance period.



What Is the MIPS Annual Call for Quality Measures?

The Annual Call for Quality Measures is part of the general CMS Annual Call for Measures process, which provides the following stakeholders with an opportunity to identify and submit candidate quality measures for consideration in MIPS:

- Clinicians;
- Professional associations and medical societies that represent eligible clinicians;
- Researchers;
- Consumer groups; and
- Other stakeholders.

Specifically, CMS encourages the above stakeholders to submit candidate measures for consideration during the Annual Call for Quality Measures. The Annual Call for Quality Measures is a narrowed quality measures solicitation process for the MIPS quality performance category. Stakeholder feedback and recommendations are part of the rigorous MIPS quality measure selection process. As part of the MIPS quality measure selection process, stakeholders are encouraged to submit candidate measures by submitting fully tested specifications and related research and background information for CMS to review and consider. This information assists CMS in determining if submitted candidate measures for the MIPS quality performance category apply to clinicians and:

- Are not duplicative of an existing or proposed MIPS quality measure.
- Are beyond the measure concept phase of development.
- Are collected by a method beyond Medicare Part B claims reporting.



- Are outcome-based rather than clinical process measures.
- Address patient safety and adverse events.
- Identify appropriate use of diagnosis and therapeutics.
- Address the domains for care coordination and patient and caregiver experience.
- Address efficiency cost and utilization of healthcare resources.
- Address a performance or measurement gap.

Currently, CMS won't accept Government Performance and Results Act (GPRA) measures that Tribes and Urban Indian health organizations are already required to report as quality measures. There are many GPRA measures that are similar to measures that are already in the program. Also, some GPRA measures are similar to measures that are part of a <u>Core Quality</u> <u>Measure Collaborative (CQMC) core measure set</u>.

To the extent possible, CMS wants to reduce the duplication of measures and align with measures used by private payer health insurances. If there are measures reportable within GPRA that don't duplicate MIPS quality measures, stakeholders are strongly encouraged to work with measure stewards to submit them during the Annual Call for Quality Measures.

The 2022 Annual Call for Quality Measures is from January 28, 2022 to May 20, 2022. The timeframe for candidate measures to be considered for inclusion on the MIPS Quality Measures List is a two-year process. Only candidate quality measures submitted by May 20, 2022 will be considered for inclusion on the MIPS Quality Measures List for the 2024 MIPS performance period.

Quality Performance Category

What Are MIPS Quality Measures?

MIPS quality measures are tools that help us measure or quantify health care processes, outcomes, and patient perceptions that go with being able to give high quality health care. MIPS quality measures help link outcomes that relate to one or more of the following CMS quality goals for health care:

- Effective;
- Safe;
- Efficient;
- Patient-centered;
- Equitable; and
- Timely.

What Is the MIPS Quality Measures Submission Process?

For the 2022 Annual Call for Quality Measures, stakeholders have an opportunity to submit candidate quality measure specifications and all supporting data files to CMS using the MUC Entry/Review Information Tool (MERIT). The timeframe to submit measures for the 2022 Annual Call for Quality Measures is from January 28, 2022 to May 20, 2022. Please refer to the <u>MERIT</u> <u>Submitter's Quick Start Guide (PDF)</u> to provide guidance on using the tool.

Section 101(c)(1) of the MACRA requires submission of new measures for publication in applicable specialty-appropriate, peer-reviewed journals prior to implementing in MIPS. The Peer-Reviewed Journal template provided by CMS, must accompany each measure submission. Please see the Peer-Reviewed Journal template for additional information provided on the <u>CMS Pre-Rulemaking website</u>.

For cases in which submitted candidate quality measures aren't included on the MUC List, CMS will contact the stakeholder point of contact regarding such status. The notice will outline the reasons why the measure is not recommended for the MUC List. If it is recommended that the measure be revised and resubmitted, the stakeholder can resubmit the measure during a subsequent Annual Call for Quality Measures cycle.

How Does CMS Select Quality Measures?

CMS completes a comprehensive review of the candidate quality measures for consideration of inclusion on the MUC List. The NQF formed the MAP to provide multi-stakeholder input and review of the measures under consideration to determine whether they are applicable to clinicians, feasible, scientifically acceptable, reliable, and valid at the level of implementation. In establishing the MIPS Quality Measure List, CMS takes into consideration the feedback from the MAP review and feedback provided by stakeholders during the notice and comment rulemaking process of the PFS proposed rule.

CMS uses the <u>Meaningful Measures Initiative</u>, as this initiative identifies the highest priorities for quality measurement and improvement. This initiative also represents an approach to MIPS quality measures which will reduce the collection and reporting burden, while producing quality measurement focused on meaningful outcomes important to patients. It serves as a guide as CMS evaluates each measure for inclusion on the MUC List to ensure that the selection of measures pursues and aligns with the agency's priorities.

The quality performance category focuses on measures in the following six healthcare priority areas for future measure consideration and selection:

- Promote Effective Prevention and Treatment of Chronic Disease;
- Promote Effective Communication and Care Coordination;
- Make Care Safer by Reducing Harm Caused in the Delivery of Care;
- Make Care Affordable;
- Strengthen Person and Family Engagement as Partners in their Care; and
- Work with Communities to Promote Best Practices of Healthy Living.

Pre-Rule Making Process

The measure-related information submitted by stakeholders during the Annual Call for Quality Measures is used by CMS to select measures that are:

- Applicable;
- Feasible;
- Scientifically acceptable;
- Reliable and valid at the level of implementation;* and
- Unique in comparison to existing measures for notice and comment rulemaking.

*MIPS requires measure testing at the individual clinician level (and may also need to be tested at the group level) for MIPS Clinical Quality Measure (CQM) and Electronic Candidate quality measures included on the 2022 Measures Under Consideration (MUC) List that are finalized through rulemaking for the 2024 MIPS performance year would be included in the MIPS Quality Measures List for the quality performance category. The MIPS Quality Measures List will also be posted in the <u>QPP</u> <u>Resource Library</u> prior to the start of the performance year.

Clinical Quality Measure (eCQM) collection types. Administrative claims measures have some flexibility in testing as it may not be feasible to test at the clinician-level and would be considered for implementation at the group level. Additionally, exceptions may be made to the case minimum (20 cases) in order to ensure the measure can be reliably scored. Therefore, administrative claims quality measures submitted must include a reliability threshold to establish how the measure may be reliably implemented, including level of implementation, case minimum, and performance period for data collection.

Measures selected by CMS for the MUC List are reviewed by the National Quality Forum (NQF) Measure Application Partnership (MAP). The MAP is a multi-stakeholder partnership that reviews and provides consensus-based input for the annual MUC List. See the <u>CMS Pre-</u> <u>Rulemaking</u> website for details. The MAP meets every year (in general, after the November 1st publication of the MUC List in December of the same calendar year and January of the following calendar year) to provide input on measures for different Medicare quality programs.

Utilizing the rulemaking process, potential new MIPS quality measures are proposed and published in the Physician Fee Schedule (PFS) proposed rule. Stakeholders have an opportunity to formally submit feedback through the notice and comment rulemaking process established in the PFS proposed rule. CMS reviews the comments received through the rulemaking process before the new MIPS quality measures are finalized in the PFS final rule, which is published in the Federal Register no later than November 1st of the calendar year before the first day of a performance year. The complete MIPS Quality Measures List published after the PFS final rule does not include Qualified Clinical Data Registry (QCDR) measures as such measures are proposed and selected through a separate process.



The Appendix provides additional details on MIPS 2022 measure priorities, gaps, needs, and specific MIPS quality measure requirements.

Where Can I Learn More?

- Quality Payment Program
- Quality Measure Specifications
- <u>CMS Call for Measures</u>
- <u>CMS Pre-Rulemaking</u>
 - o 2021 CMS Program-Specific Measure Needs and Priorities
 - o 2022 CMS Program-Specific Measure Needs and Priorities (coming soon)
 - o <u>CMS Quality Measure Development Plan</u>
- CMS Measures Management System Blueprint (Version 17.0)

Appendix

Quality Performance Category: 2022 MIPS Quality Measure Needs, Measurement Gaps, and Priorities

Current Program Measure Information

Under MIPS, the quality performance category focuses on measures in the following six healthcare priority areas for future measure consideration and selection. The following table identifies the number of current MIPS quality measures prioritized under each healthcare priority area: **Note:** Additional information regarding the MIPS quality measure priority areas will be provided within the 2022 CMS Program-Specific Measure Needs and Priorities that will be posted on the <u>CMS Pre-Rulemaking</u> website.

Table 1. Quality Measures in MIPS

CMS Healthcare Priority	Implemented/Finalized* (2022 Measure Set)
Promote Effective Prevention and Treatment of Chronic Disease	90
Promote Effective Communication and Care Coordination	23
Make Care Safer by Reducing Harm Caused in the Delivery of Care	17
Make Care Affordable	38
Strengthen Person and Family Engagement as Partners in their Care	32
Work with Communities to Promote Best Practices of Healthy Living	0
TOTAL	200
*Implemented/Finalized: MIPS Quality measures implemented/finalized in the CY 2	2022 PFS final rule.

Quality Measure Priority Areas for Future Consideration

CMS will not propose the implementation of candidate quality measures that do not meet the MIPS measure criteria and requirements outlined on page 10 of this Appendix, performance or measurement set gaps, needs, and priorities. Table 2 identifies the performance and measurement gaps, needs, and priority areas.

Gap Areas by Specialty	Priority Clinical Topic Areas	Other Priority Quality Topics
 Interventional Cardiology Non-patient facing (e.g., Pathology Radiology) Nephrology Dentistry Podiatry Nutrition/Dietician Pain Management Plastic Surgery Pulmonology 	 Chronic conditions Arrhythmias, Chronic Obstructive Pulmonary Disease, Diabetes, Hepatitis B, Septicemia, Respiratory Failure, Asthma Opioid Epidemic Maternal Health Mental Health ther measure needs and priorities may a start of the start of t	 Outcome measures [outcome, intermediate outcome, and patient reported outcome measures (PRO-PMs) (patient voice)] Coordination/Communication/Team -based Care Digital measures (e.g., quality measures with sources from administrative systems, electronically submitted clinical assessment data, case management systems, EHRs, wearable/medical instruments, patient portals or applications, health information exchanges (HIEs) or registries, and other sources) Measures that provide new measure options within a topped-out specialty area Health equity COVID-19 Shared decision-making (patient voice) Experience of care (patient voice)

Table 2. Performance or Measurement Gaps, Needs, and Priority Areas*



High Priority MIPS Quality Measures for Future Consideration

CMS identifies the following as high-priority MIPS quality measures for future consideration:

- Patient Experience: This means that the measure should address the experience of each person and their family; and the extent to which they are engaged as partners in their care.
- Care Coordination: This means that the measure must address the promotion of effective communication and coordination of care; and coordination of care and treatment with other providers.
- Efficiency: This means that the measure must address the affordability of health care including unnecessary health services, inefficiencies in health care delivery, high prices, or fraud. Measures should cause a change in efficiency and reward value over volume.
- Patient Safety: This means that the measure must address either an explicit structure or process intended to make care safer, or the outcome of the presence or absence of such a structure or process; and harm caused in the delivery of care. This means that the structure, process, or outcome must occur as a part of or as a result of the delivery of care.
- Appropriate Use: CMS wants to specifically focus on appropriate use measures. This
 means that the measure must address appropriate use of services, including measures of
 over-use.
- Opioid Related: CMS wants to focus on opioid related measures to address the national Opioid Epidemic.

Topped Out Measure Considerations

As topped out MIPS quality measures are removed from MIPS, CMS will monitor the impact of these removals on the MIPS quality measure specialty sets that are available for clinician reporting. CMS strongly encourages measure developers to review the 2022 MIPS Quality Benchmarks that identifies topped out measures, and to develop measures that may replace those topped out measures for future MIPS performance years. In addition, CMS welcomes stakeholder suggestions to address these potential gaps within the measure sets.

A measure may be considered topped out if measure performance is so high and unvarying that meaningful distinctions and improvement in performance can no longer be made. Topped out process measures are those with a median performance rate of 95% or higher, while non-process measures are considered topped out if the truncated coefficient of variation is less than 0.10 and the 75th and 90th percentiles are within two standard errors. CMS continues to identify topped out measures through the benchmark file. The column labeled topped out in the benchmark file will indicate whether the measure is topped out with a designation of "yes" in the 2022 Benchmark File. The identification of topped out measures may lead to potential measure gaps.

Measure Criteria and Requirements

CMS applies criteria for quality measures that may be considered for potential inclusion in the MIPS. At a minimum, the following criteria and requirements must be met for inclusion in MIPS:

CMS is statutorily required to select measures that reflect consensus among affected parties and, to the extent feasible, include measures set forth by one or more national consensus building entities.

- To the extent practicable, candidate quality measures selected for inclusion on the final list will address at least one of the following MIPS quality domains: Communication and Care Coordination, Community/Population Health, Effective Clinical Care, Efficiency and Cost Reduction, Patient Safety, Person and Caregiver-Centered Experience, and Outcomes.
- Candidate measures should align with the Meaningful Measures Initiative and address at least one of the <u>CMS Healthcare Priority Areas</u>.
- MIPS quality measure submitters are required to link their submitted candidate quality measures to existing and related cost measures and improvement activities, as applicable and feasible. MIPS quality measure submitters will be required to provide a rationale as to how they believe their candidate quality measure correlates to other performance category measures and activities as a part of the Call for Measures process.
- Measures implemented in MIPS may be available for public reporting on Care Compare.
- Measures must be fully developed, with completed testing results at the clinician level (and group level as appropriate) and ready for implementation at the time of submission (CMS' internal evaluation).
- Preference will be given to measures that are endorsed by the NQF.
- Measures should not duplicate other MIPS quality measures. Duplicative measures are assessed to see which would be the better measure for the MIPS quality measure set.
- Measure performance and evidence should identify opportunities for improvement. CMS does not intend to implement measures in which evidence identifies high levels of performance with little variation or opportunity for improvement, e.g., measures that are topped out.

Electronic Clinical Quality Measures (eCQMs)

eCQMs must meet Electronic Health Record (EHR) system infrastructure requirements, as defined by MIPS regulation. Beginning with calendar year 2019, eCQMs use Clinical Quality Language (CQL) as the expression logic used in the Health Quality Measure Format (HQMF). CQL replaces the logic expressions previously defined in the Quality Data Model (QDM).

The data collection mechanisms must be able to transmit and receive requirements as identified in MIPS regulation. For example, eCQMs being submitted as Quality Reporting Data Architecture (QRDA) III must meet the standards defined in the CMS QRDA III Implementation Guide.

- eCQMs must have HQMF output from the Measure Authoring Tool (MAT), using MAT v5.6, or more recent, with implementation of CQL logic. For additional information, please review the <u>MAT</u>.
- Bonnie test cases must accompany each measure submission. For additional information, please review <u>eCQM Tools and Key Resources</u>.
- Feasibility, reliability, and validity testing must be conducted for eCQMs.
- Testing data relevant to the data source must accompany measure submission. For example, if a measure is being reported as a CQM and an eCQM, testing data for both versions must be submitted.

eCQM Readiness: How Do I Know if an eCQM Is Ready for Implementation in MIPS?

Tables 3 and 4 (as shown below) contain characteristics for consideration and requirements for determining whether an eCQM is ready for implementation into MIPS.

Characteristic	Testing	Documentation for CMS
Is the eCQM feasible?	Feasibility test results	NQF's feasibility score card
Is the eCQM a valid measure of quality and/or are the data elements in the eCQM valid?	Correlation of data element or measure score with 'gold-standard', or face validity results	Kappa agreement between EHR extracted data element and chart abstract and/or correlation between measure score and a related external measure of quality; information about data used for testing (e.g., number of practices, number of providers)

Table 3. Step 1: Assess and Document eCQM Characteristics



Characteristic	Testing	Documentation for CMS
Is the eCQM reliable?	Provider level reliability testing for measure score in the setting in which the measure is intended to be reported	Reliability coefficient using signal- to-noise or split half inter-rater reliability; information about data used for testing (e.g., number of practices, number of providers).

Table 4. Step 2: Assess and Document eCQM Specification Readiness

Requirement	ΤοοΙ	Documentation for CMS
Specify eCQM according to CMS and ONC standards	MAT	MAT output to include, at minimum, HQMF and human readable files
Create value sets that use current, standardized terminologies	The National Library of Medicine's Value Set Authority Center (VSAC)	Published value sets in the VSAC that have been validated against the most recent terminology expansion with 100% active codes
Test eCQM logic using a set of test cases that cover all branches of logic with 100% pass rate	Bonnie	Excel file of test patients showing testing results (Bonnie export)

Resources

- Value Set Authority Center
- <u>Bonnie</u>
- eCQI Resource Center
- CMS Measures Management System Blueprint (Version 17.0)
- 2021 CMS Needs and Priorities Document
- Overview of Rulemaking Process for Measure Selection
- Quality Payment Program
- <u>Cost Measures</u>
- Improvement Activities



Version History Table

Date	Change Description
2/8/2021	Original posting