A Guide for 2022 Merit-based Incentive Payment System (MIPS) & Your Electronic Health Record (EHR) System

HSAG HEALTH SERVICES ADVISORY GROUP

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Key Questions for Your Vendor

Does the EHR meet the certification requirements for 2022 MIPS reporting (2015 Edition certification criteria, 2015 Edition Cures Update certification criteria, or a combination of both for participation in this performance category)?
Check here: https://chpl.healthit.gov/#/search.

☐   Yes
☐   No (EHR is not certified to participate in the MIPS Promoting Interoperability (PI) category)

Can the EHR vendor report MIPS for you?
☐   Yes
☐   No

Which MIPS category/categories can the EHR vendor report for you?
☐   Quality
☐   Promoting Interoperability (PI)
☐   Improvement Activities (IA)

Can the user generate a Quality Reporting Document Architecture (QRDA) III file to upload its performance data?
☐   Yes
☐   No (You will need a third-party vendor that can report for you.)

2022 Qualified Registries, 2022 Quality Clinical Data Registries (QCDRs)

Are you familiar with and do you have access to your MIPS dashboard?
☐   Yes
☐   No [Ask your vendor for a tutorial]

General MIPS Questions for Your Vendor

- What level of support is available for MIPS reporting?
- Does anything have to be outsourced for MIPS reporting?
- Can you provide clinical quality data/PI data in the CMS-acceptable format, so we can submit for MIPS?
- Are there electronic clinical quality measures (eCQMs) available?
- Is a MIPS Dashboard built in? Can the user access it?
- Is the data from the MIPS Dashboard in real-time? If not, when does it update (nightly, once a week, etc.)?
- Do you have materials or training for users that includes how to optimize your software for MIPS?
- Can the EHR be used to report MIPS measures and activities directly to CMS? If so, what is the cost?
- Can a third party access the data if the EHR cannot be used to report MIPS measures and activities directly to CMS? If so, what is the cost?
- Are there peer practices that we can share strategies with, or a user's group, dedicated to MIPS?

2022 Quality

Are the clinical quality measures (CQM) specifications updated for the current year?

☐ Yes
☐ No

Are these measures reported as eCQMs or as MIPS CQMs (registry measures)?

☐ Yes
☐ No

Do you know how to generate reports for your quality measures?

☐ Yes
☐ No (Ask your vendor for a tutorial.)

Does your EHR support your full specialty measure set?
Look up your specialty measure set here: https://qpp.cms.gov/mips/explore-measures

☐ Yes
☐ No—Which measures are you able to report on? (List them below.)

_____   _____   _____

_____   _____   _____

For each quality measure, do you have the required clinical documentation that must be completed to ensure accurate data is captured?

☐ Yes
☐ No—(Ask your vendor for the specifications to your measures.)

Does your EHR prompt you for those measures and are they pulling into the MIPS dashboard?

☐ Yes
☐ No (Ask your vendor for the workflow for this measure. Also, download the measure specifications from the CMS website for your submission method and confirm that they match.)

Do you periodically review your Quality measures' performance?

☐ Yes (How often? At least monthly is recommended.)
☐ No (Review the numerator/denominators for your measures.)

Quality Measure Questions for Your Vendor

• Are there tutorials or videos for measure documentation?
• Are the exclusion and/or exception codes working to remove patients from the denominator?

2022 Promoting Interoperability

What PI measures can your EHR support?

☐   e-Prescribing

☐   Bonus (optional): Query of Prescription Drug Monitoring Program (PDMP)

☐   Option 1: Support Electronic Referral Loops by Sending Health Information
           Support Electronic Referral Loops by Receiving Health Information

☐   Option 2: Health Information Exchange (HIE) Bi-Directional Exchange

☐   Provide Patients Electronic Access to their Health Information (Patient portal)

☐   Report to two Immunization Registry Reporting and Electronic Case Reporting public health agencies or clinical data registries and/or the three optional reporting measures below:
- Immunization Registry Reporting (Required)
- Electronic Case Reporting (Required)
- Public Health Registry Reporting (Optional–bonus)
- Clinical Data Registry Reporting (Optional–bonus)
- Syndromic Surveillance Reporting (Optional–bonus)

Do you know how to generate reports for your PI measures?

☐   Yes
☐   No (Ask your vendor for a tutorial.)

Do you know the EHR workflows for the PI measures?

☐   Yes
☐   No (Ask your vendor for a tutorial.)

Do you periodically review your PI measures' performance?

☐   Yes (How often? At least monthly is recommended.)
☐   No (Look at the numerator/denominators for your measures.)

PI Questions for Your Vendor

Are there tutorials or videos for measure documentation?

e-Prescribing Objective
- When reporting the required e-Prescribing measure, does the EHR report an exclusion automatically if the denominator is less than 100, or do I have a choice to either take an exclusion or report the data?
- Is the PDMP built into the EHR?
  - o If yes, will the EHR report this optional measure?
  - o Is there an additional cost to add this model or interface to the EHR?
- If the EHR does not have the PDMP as a module, can I document in the EHR when the PDMP was queried while caring for the patient? Will the EHR then submit this optional measure for bonus points?

HIE Objective (Three measures, two options)
- Is the EHR capable of sending health information (the Summary of Care) to other providers and facilities in the appropriate format?
- What is the clinician's direct address as provided by the EHR?
- Is the EHR capable of receiving and incorporating health information from other providers and facilities?
    - o Does the EHR collect both the numerator and denominator for these measures?
- Is the EHR capable of interfacing and engaging in bi-directional exchange with an HIE?
    - o What is the cost for this interface?
- Does the EHR document the receipt of the Summary of Care by the other party?
- Does the EHR automatically report an exclusion if the denominator is less than 100?
    - o Do I have a choice to take an exclusion or report the data?

Public Health and Clinical Data Exchange Objective
- Which state and national public health registries and data exchanges is the EHR able to connect with?
    - o Can data be both sent and received?
    - o Do you assist with connecting to these public health registries?
    - o Is there an additional cost to connect to these public health registries?
- How does the EHR report this measure to CMS?
    - o Do I need to do anything to report this measure?
    - o How does the EHR report exclusions for this measure?
- Is the EHR able to attest to one connection and take an exclusion for the other?

Provide Patients Access to Their EHR (Patient portal)
- Can you confirm the EHR correctly calculates this measure by including in the numerator all unique patients who have been offered access to the patient portal?
- Is there a cost for patient portal?

Security Risk Analysis (SRA)
- What are the criteria for the EHR to report this measure? (https://www.healthit.gov/topic/privacy-security-and-hipaa/security-risk-assessment-tool)
- Do I have to manually enter confirmation that the SRA has been completed or reviewed?

Safety Assurance Factors for EHR Resilience (SAFER) Guides
- What are the criteria for the EHR to report this measure?
- Do I have to manually enter confirmation that the SAFER Guides have been completed or reviewed?

PI Exceptions
- As of 2022, small practices will be automatically granted a PI hardship exception, but submitting any PI data negates the exception. How should I inform the EHR that I will choose to take the automatic PI hardship exception?

2022 Improvement Activities

What IA does your EHR support?

2022 Improvement Activities Inventory:

https://qpp-cm-prod-content.s3.amazonaws.com/uploads/1727/2022%20Improvement%20Activities%20Inventory.zip

Will your EHR submit IA for your practice?

☐   Yes
☐   No (Log in to attest here: https://qpp.cms.gov/login.)