Prepare for MIPS/APMs: A Checklist for Practice Leaders

On April 27, 2016, the Centers for Medicare & Medicaid Services (CMS) released a highly-anticipated proposed rule outlining physician payment reforms as required by the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA). The proposed rule includes key provisions of the new Merit-Based Incentive Payment System (MIPS) and alternative payment model (APM) guidelines that will take effect as early as 2017. MGMA developed this checklist to provide practice executives with action steps to prepare their organizations for the transition to MIPS and APMs.

Steps practice leaders can take now:

- **Educate yourself.** Visit MGMA.com/MACRA for an executive summary of the proposed rule, a guide for small practices, and the latest news about MIPS and APMs.

- **Understand that this is a work in progress.** The MIPS and APMs proposed rule is subject to change based on input from MGMA and other stakeholders. A final rule is expected in the fall of this year.

- **Assess your practice’s performance under current federal quality reporting programs.** Although different, performance in PQRS, Meaningful Use, and the Value-Based Payment Modifier will provide insight into future performance under MIPS. For example, review your practice’s Quality and Resource Use Report to gain an understanding of your practice’s relative cost and quality performance as compared to a national benchmark.

- **Evaluate EHR and third-party vendor readiness.** Contact your vendors to assess their ability to support the transition to MIPS and determine your EHR vendor’s expected timing to recertify to the ONC 2015 requirements.

- **Review your internal workflow processes related to patient engagement and data exchange.** What percentage of your patients engaged your clinicians through secure messaging and/or your web portal? What percentage of your external transitions of care involved data exchange via your EHR? Evaluate your vendor and staff allocation/training needs in both of these areas.

- **Explore clinical practice improvement opportunities.** Practices will be given credit in MIPS for activities such as extending hours and managing transitions of care.

- **Consider participating in a value-based payment initiative that would prepare your practice for an APM.** Substantial participants in eligible APMs will receive an annual 5% lump sum bonus from 2019 through 2026 and be exempt from MIPS.

- **Leverage your MGMA membership, network with your peers, and engage with MGMA Government Affairs.** Join MGMA’s new interactive e-group, “MIPS/APMs Medicare Value-Based Payment Reform,” to hear from your peers and ask MGMA Government Affairs staff questions as the MIPS and APM programs unfold.