# Navigate PQRS: Individual Eligible Professional

# Step 1: Determine Eligibility

If any of the following apply, you are eligible for and must participate in PQRS to avoid a penalty:

- You are an independent contractor and you bill Medicare Part B claims
- You are providing covered professional services pain under or based on the Medicare Physician Fee Schedule (MPFS) (including Medicare Part B primary claims, Medicare Part B secondary payer claims, and Railroad Medicare Part B claims
- You are a Medicare-enrolled provider

### Step 2: Decide How to Participate

If you bill using your individual National Provider Identifier (NPI)/Tax Identification Number (TIN), you are an:

#### **Individual Eligible Professional**

- Individual EPs reporting in multiple Tax IDs: PQRS payment adjustment would be applied to each unsuccessful NPI/TIN reporting. Individual EPs can successfully report PQRS under 1 TIN and still have penalty adjustments applied for not successfully reporting under their different TIN.
- Individual EPs within a group practice that report as individuals: Are free to choose
  which PQRS measures/measures groups to report and are not required to register to
  participate as an individual EP.
  - Analysis is based on the individual/rendering NPI not group NPI.
  - There is potential for some individual EPs in a group practice to successfully report while other EPs in the same group may be subject to penalty
- Individual EPs in solo practices: Participating in PQRS as an individual is the only option.

## Step 3: Choose a Reporting Method

You are an individual eligible professional. You can report PQRS information in the following ways:

<u>Claims-Based Reporting</u> is when an individual EP reports their PQRS data via Medicare
Part B claims. It is readily accessible to EPs as it is a part of routine professional and
institutional billing processes, they simply need to start reporting on the Quality Data
Codes listed in the individual measures they select.

- <u>Registry Reporting</u> is when an individual EP reports their PQRS data through a qualified registry. The registry is an entity that collects clinical data from EPs and submits it to CMS on behalf of the participants
- <u>Electronic Health Records (EHR) Reporting</u> is when an individual EP reports their PQRS data electronically using an Electronic Health Record. Individual EPs have the following CEHRT-based reporting options:
  - o Submit PQRS quality measure data directly from the CEHRT or
  - Submit PQRS quality measure data extracted from their CEHRT to a qualified EHR data submission vendor (DSV) who submits on behalf of the EP or PQRS group practice.
- Qualified Clinical Data Registry (QCDR) Reporting is when an individual EP will use a
  QCDR to complete the collection and submission of PQRS quality measures. To be
  considered a QCDR for purposes of PQRS, an entity must self-nominate and successfully
  complete a qualification process. Your Academy is working towards building a spine
  focused QCDR.

## Step 4: Select Measures

#### **Measures Groups**

- Individual eligible providers can select Measures Group reporting to satisfy their 2016
   PQRS requirements. This reporting option is only available through registry reporting in 2016.
  - Select just ONE Measures Group per provider to satisfy PQRS requirements!
  - Report on 20 of your patients seen in 2016, 11 of which must be Medicare part B Fee-For Service (FFS) patients.
- The top Measures Groups used for 2015 reporting by PM&R physicians were:
  - Chronic Kidney Disease Measures Group
  - Diabetes Measures Group
  - o Preventative Measures Group
  - o Total Knee Replacement Measures Group

#### **Individual Measures**

- Individual eligible providers can select measures based on their desired reporting outcome by reporting:
  - o On nine (9) individual measures
    - Select at least 1 Cross Cutting measure if you see patients in a face-toface encounter
    - EPs that cannot report on 9 measures or less than 3 domains would be subject to the <u>Measure-Applicability Validation (MAV) process</u>, but can still avoid penalties
  - Across at least three (3) NQS domains
  - o On at least fifty percent (50%) of eligible Medicare Patients

# Need more help?

- Visit <a href="www.aapmr.org/pqrs">www.aapmr.org/pqrs</a> or contact <a href="healthpolicy@aapmr.org">healthpolicy@aapmr.org</a>.
- Check out AAPM&R's PQRS Reporting Tool: PQRSwizard.
- Required to participate but cannot meet the requirements? Learn about the MAV process.