

2021 MIPS: Proposed Key Changes for Ophthalmology Practices

2021 is the fifth performance year of the Merit-Based Incentive Payment System (MIPS). While many of the requirements for 2021 are the same as they were for previous years, there are a few key proposed changes that ophthalmology practices should be aware of to be successful in the program. The final rule is scheduled to be published at the beginning of December 2020. This guide outlines *key proposed changes for 2021*. We plan on updating the guides for all MIPS categories after the final rule is released. They will be located in the ASCRS ASOA MACRA Center at ascrs.org/macracenter.

Proposed Key 2021 MIPS Changes

MIPS Performance Threshold

- **The 2021 MIPS performance threshold will increase from 45 points in 2020 to 50 points.** Physicians and practices must score at least 50 total points to avoid a maximum 9% penalty in 2023. This will be subject to variations from final calculations and COVID-19 impacts.
- CMS estimates approximately 930,000 clinicians will be **MIPS eligible in 2021**. Approximately 92.5% of eligible clinicians who submit data will receive a positive or neutral payment adjustment. The mean final score would be 76.75, the median would be 81.32, **the maximum positive payment adjustment would be 6.9%, and the maximum penalty would be 9% (subject to variations from final calculations and COVID-19 impacts).**

Cost Category

- **Cost will count for 20% of a physician's final MIPS score in 2021 – increased from 15 points in 2020.**
- Updates to existing measure specifications to include telehealth services that are directly applicable to existing episode-based cost measures and the TPCC measure.

Quality Reporting

- **Lowering the weight of the Quality Category performance score from 45% to 40% of the MIPS final score.**
- Use performance period, not historical, benchmarks to score quality measures for the 2021 performance period.
- Update the scoring policy for topped-out measures, so that the 7-measure achievement point cap will be applied only if the measure is identified as topped out based on the established benchmarks for both the 2020 and 2021 performance periods.
- Removing 14 quality measures from the MIPS program with a total of 206 quality measures starting in 2021 performance year, including two new administrative claims-based measures, one of which has a 3-year measurement period.
- End the CMS Web Interface as a quality reporting option for ACOs and registered groups, virtual groups, or other APM entities beginning with the 2021 performance period.

Improvement Activities

- Establish 1 new criterion for nominating new improvement activities.
- Allow 2 new options for nominating improvement activities.
- Modify 2 existing improvement activities:
 - Engagement of patients through implementation of improvements in patient portal, and
 - Comprehensive Eye Exams.
 - To receive credit for this activity, MIPS eligible clinicians must promote the importance of a comprehensive

eye exam, which may be accomplished by any one or more of the following:

- providing literature,
 - facilitating a conversation about this topic using resources such as the “Think About Your Eyes” campaign,
 - referring patients to resources providing no-cost eye exams, such as the American Academy of Ophthalmology’s EyeCare America and the American Optometric Association’s VISION USA, or
 - promoting access to vision rehabilitation services as appropriate for individuals with chronic vision impairment.
- This activity is intended for:
 - Non-ophthalmologists / optometrists who refer patients to an ophthalmologist/optometrist;
 - Ophthalmologists/optometrists caring for underserved patients at no cost; or
 - Any clinician providing literature and/or resources on this topic.

Promoting Interoperability Performance Category

- Retain the Query of Prescription Drug Monitoring Program (PDMP) measure as an option measure and to make it worth 10 points;
- Change the name of the Support Electronic Referral Loops by Receiving and Incorporating Health Information by replacing “incorporating” with “reconciling”; and
- Add an optional Health Information Exchange (HIE) bi-directional exchange measure.

MIPS Value Pathways (MVPs)

- No MVPs will be introduced into the program for the 2021 performance period.
- Additions and revisions to the MVP framework’s guiding principles and development criteria to support stakeholder engagement in co-developing MVPs and establishing a clear path for MVP candidates to be recommended through future rulemaking.

APM Performance Pathway (APP)

- New pathway only for MIPS APMs participants (ACOs) and complementary to MVPs with a fixed set of measures for each performance category
 - Quality: Composed of 6 measures specifically focused on population health, available to all MIPS APM participants; Quality measures reported through the APP would automatically be used for purposes of quality performance scoring under the Shared Savings Program
 - Cost: Weighted to 0% to align with current MIPS APMs responsibilities
 - Improvement Activities: Score automatically assigned based on MIPS APMs respective requirements; in 2021, all APM participants reporting via the APP will receive a score of 100%
 - Promoting Interoperability: Reported and scored at the individual or group level as required in MIPS
- Medicare Shared Savings Program ACOs would be required to report through the APP. Individual physicians participating in an ACO have the option of reporting outside the APP, through traditional MIPS.

MIPS Participation Options

- All MIPS eligible clinicians, including those in a MIPS APM, may choose to participate in MIPS as:
 - An individual
 - A group
 - A virtual group
 - An APM Entity

- The APM Scoring Standard (reporting requirements and scoring approach for APM participants) will end beginning with the 2021 performance period.

COVID-19 Flexibilities

- Double the Complex Patient Bonus to 10 bonus points to account for additional difficulty in treating patients during the COVID-19 PHE (**for the 2020 performance period only**).
- Allow APM Entities to submit an application to reweight MIPS performance categories as a result of extreme and uncontrollable circumstances, such as the public health emergency resulting from the COVID-19 pandemic. This policy would apply beginning with the 2020 performance period.

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