

PQRS 2014 Last Minute Checklist: What You Can and Can't Do Now

written by Theresa Hush | March 25, 2015



With just a few days to go before the final reporting deadline, it's time to cross the t's and dot the i's on PQRS 2014. There may be a few practices still trying to put together a reporting program, but almost everyone using a Registry and who has done the work is ready to report.

Here are the top five things you can and should do before your Registry is ready to hit "Submit":

Check again that your Tax Identification Number (TIN) is correct. Yes, you may have already verified it electronically, but numbers sometimes get transposed. Please do it once more. If you are reporting individual providers, also confirm that each individual provider's National Provider Identifier (NPI) is correct.

Compare the providers in your Registry's Roster of participating eligible providers with data on each of your TINs. Sometimes providers are incorrectly assigned to TINs or changed during the year, and this matters. If you are reporting with individual measures and providers are missing, you may fall short of the 51 percent provider success benchmark for reporting. If you are reporting by the Group option, an incorrect Roster may not show data for all your providers.

Check your group's providers for additional categories of Medicare-eligible providers—and

not just physicians—to make sure that you have correctly captured every eligible provider in the Registry Roster. Anyone who bills Medicare Part B is eligible.

Review your Registry results to make sure that your latest data has not placed you below any completion or performance benchmarks and that you have successfully met the criteria for reporting nine measures in three domains, for each group. If there are a few patients requiring chart checks so that you can report successfully, now is the time to input missing data. Charge-lag plus resubmitted or corrected claims will mean that new patients are eligible for measures for 2014 based on data received in March.

Review your Registry's measure recommendations relating to the Value-Based Payment Modifier, or a VBPM Consultation, and make sure that you have signed off on what will be reported. Only reported measures will affect your quality tiering results under the VBPM.

What's Too Late to Fix—How to Act Now to Improve PQRS 2015

Some practices may be scrambling to salvage reporting results for next week's March 31 deadline. It's too late to make significant changes. But it's never too late to learn how to avoid this year's pitfalls and ensure best reporting practices for 2015:

You can't change PQRS results by adding patient information that is not in the chart. If your patients with diabetes did not meet performance for foot exams, you can't make that happen now. But for 2015, you can put your patients with diabetes on a visit reminder schedule, and use a Registry to track whether you are meeting reporting requirements as you go forward.

You can't change your VBPM cost composite significantly. If you haven't already reviewed your QRUR and worked with your Registry to develop hospital measures, population health or other actions that will affect your cost composite, it's too late for 2014. For 2015, you should make sure that you have reviewed your CMS QRUR reports, and you should consider adopting measures that will track VBPM components through a Registry that offers these.

You can't restructure TINs or administratively try to resolve PQRS performance by changing the mix of providers. The claims for these providers have already been submitted, and their assignment to groups cannot be undone. If you plan to make major changes to your TINs in 2015, consider doing these at the end of the calendar year, if you haven't already done it. This will make gathering Medicare efforts easier.

You can't report via the Group Practice Reporting Option (GPRO) if you find out that you didn't quite meet the individual reporting requirements. This required self-nomination by September 30, 2014. If you already self-nominated for GPRO but think it more beneficial to do individual reporting, you also can't turn back. For 2015, now is a good time to compare your results under various methods to meet the decision date to self-nominate by June 30, 2015.

You can't select a Registry that will help you avoid VBPM penalties based on 2014 data. Not all registries will offer this service with their PQRS programs, but it is too late to find one that does. This requires a head start to download and analyze a group's QRUR data along with other PQRS data to determine how to best optimize the program. For 2015, choose a Registry that will not only help you do best for PQRS, but will have VBPM enhancements to optimize both programs.

And now we finally bid 2014 *adieu*, close our books on the end of this chapter and wish you luck. Let's start 2015 on the right foot!

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