A Guide for Understanding the 2007 Physician Quality Reporting Initiative (PQRI) Incentive Payment August 15, 2008

This document is a supplement to the CMS 2007 PQRI Feedback Report User Guide (available at https://www.qualitynet.org/imageserver/pqri/documents/PQRI%20Reports%20User%20Guide.pdf).

<u>NOTE</u>: Only Medicare Part B claims which contained an individual National Provider Identifier (NPI) were included in the 2007 incentive payment calculation. Medicare Part B Claims which contained a legacy UPIN and no NPI were NOT included in the 2007 incentive payment calculation.

Incentive amounts were calculated using the following steps <u>for each incentive-eligible provider</u> (NPI within a practice [i.e., NPI/TIN]). Incentive payments were aggregated for all NPIs within the TIN and distributed at the TIN level in a lump-sum payment.

Step 1: Apply the 1% Completion Factor	
٠	The 2007 Physician Fee Schedule (PFS) total allowed charges were increased by 1% to
	account for claims which were submitted by professionals on or before February 29, 2008,
	but were not included in the National Claims History (NCH) database as final-action claims
	when the data were obtained for 2007 PQRI analyses.
	Step 2: Calculate the Average Payment per Measure (APM)
[NOTE: Only relevant to incentive payments that were capped]	
٠	The CMS national APM was calculated and used for calculating an individual Eligible
	Provider's (EP) Cap amount.
•	The APM is the same value for all measures and all eligible providers.
٠	The APM applies to and was calculated for all PFS-allowed charges on claims which
	included one or more valid reporting instances.
٠	The sum was calculated for all identified PFS-allowed charges on claims with valid reporting
	instances ONCE per claim (using unduplicated claim's charges).
•	The sum of national charges was divided by the number of reporting instances identified.
Step 3: Calculate the Cap for Each Incentive-Eligible NPI/TIN	
٠	2007 PQRI had a Cap (maximum) on the incentive amount.
٠	For each incentive-eligible NPI/TIN, the Cap was calculated as:
	\circ Cap = 3 x APM x Instances of quality-measure reporting
	- Includes both a "valid" and "attributable" reporting instance (defined on page 2).
٠	Cap amount was calculated for all incentive-eligible NPI/TINs, but only applied to a small
	percentage of EP's whose Cap was smaller than their 1.5% of total allowed PFS charges.
٠	The eligible NPI/TIN incentive payment amount was the lesser of the 1.5% of the Medicare
	Physician Fee Schedule (PFS) allowable charges for the NPI/TIN and the Cap amount
	calculated for the NPI/TIN.
Step 4: Calculate the Incentive for Each Incentive-Eligible NPI/TIN	
•	All PFS allowed charges (with the 1% completion factor) on claims for incentive-eligible
	NPI/TIN combinations were identified for inclusion or exclusion (See list below).
•	The 1.5% incentive amount was calculated by:
	• Adding PFS-allowed charge amounts for each NPI/TIN, then ≥ 0.015 .
	\circ NPI/TIN incentive = Lesser of the Cap or 1.5% incentive amount
NOTE: Only Medicare Part B claims which contained an individual National Provider	
Identifier (NPI) were included in the 2007 incentive payment calculation. Medicare Part B	
Claims which contained a legacy UPIN and no NPI were NOT included in the 2007	
incentive payment calculation.	
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Identified Inclusion for PFS Charges:

- First expense date and last expense date were between 7/1/2007 and 12/31/2007
- NCH processing date on or before 2/29/2008
- Claim must be marked as "final" in the Part B claims database (Note: Split claims in the NCH file exceeding 13 HCPCS service lines were rejoined)
- Line items identified by HCPCS and modifier(s) were subject to the PFS
- Technical components of diagnostic services and anesthesia services (note: radiopharmaceuticals will be included in the basis of total allowed charges on which the 1.5% bonus is calculated)

Identified Exclusions for PFS Charges:

- Denied claims or denied line items
- Amount billed above the PFS for assigned and non-assigned claims
- Clinical laboratory services
- Pharmaceuticals billed by physicians
- Rural Health Center/Federally Qualified Health Center services
- Ambulatory Surgical Center (ASC) facility charges

Key Terms as Used in PQRI Analysis and Documentation:

"TIN" - Taxpayer Identification Number or "Tax ID Number"

For PQRI, "TIN" includes all of the following types of identifiers:

(1) Individual Social Security Number/Social Security Account Number (SSN/SSAN);

(2) Employer Identification Number (EIN), also known as a "Tax ID Number", typically held by businesses or other organizations with employees; and

(3) Individual Taxpayer Identification Number (I-TIN), issued by the IRS to individuals who do not need an EIN and do not wish to use their individual SSN/SSAN for certain business transactions.

NPI – National Provider Identifier

Only Type I NPIs represent individual EPs. Type II NPIs, issued to group practices and institutional providers, are not used in PQRI incentive eligibility or amount calculation. Group-level identifiers are used for the 2007 PQRI solely by the Medicare Carrier or A/B Medicare Administrative Contractor (MAC). The Carrier or A/B MAC then routes to each TIN the sum of incentives earned by satisfactorily-reporting individual EP's billing PFS services under that TIN for the 2007 PQRI reporting period.

NPI/TIN

The key unit of analysis for the 2007 PQRI incentive payment eligibility and amount is the individual NPI within a TIN. (*If an individual EP furnished services for which reimbursement is claimed under more than one TIN, the professional's PQRI reporting rates and allowed charges are analyzed under each TIN separately*).

Valid Instance of PQRI Reporting

A PQRI measure's quality-data (CPT Category II or G-) code submitted on a claim that also contained any combination of applicable CPT Category I service code and ICD-9-CM diagnosis code that defines a reportable instance for the measure, as identified by the measure's detailed specifications. (*The full, detailed specifications for all 2007 PQRI quality measures, as implemented in 2007, are available for download from the CMS PQRI web site at:*

http://www.cms.hhs.gov/apps/ama/license.asp?file=/PQRI/downloads/2007PQRIMeasure_Specifications.pdf.)

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Attributable Instance of PQRI Reporting

A PQRI measure's quality-data (CPT Category II or G-) code that is appropriately identified on the claim by the individual (Type I) NPI of the professional reporting the measure.

PFS Allowed Charges

For purposes of PQRI analysis, Part B Physician Fee Schedule (PFS) allowed charges are listed in the Incentive Payment Summary. For more information on the PFS and Physician Reimbursement Rules, please refer to the CMS website at

(http://www.cms.hhs.gov/PQRI/05_StatuteRegulationsProgramInstructions.asp#TopOfPage).

Calculation of Incentive Earned by Individual EPs Satisfying 2007 PQRI Reporting Criteria:

The incentive earned by each individual EP satisfying reporting criteria for 2007 is the *lesser* of *either*: 1.5% of the EP's total allowed charges for all PFS-covered professional services billed under the individual's NPI during the July-December, 2007 reporting period;

or

EP's total valid instances of PQRI reporting (NPI correctly submitted quality-data code) x the nationalaverage per-measure payment amount x 300%.

See posted FAQs on the CMS web site for more information: #8262, #8267, #8270, #8285, #8337, #8878, #9159, and #9341. The site is updated frequently so review often to see newly posted FAQs and other related PQRI reference materials.

(Note for 2008 PQRI: the MMSEA authorizes a PQRI incentive payment for reporting on services furnished in 2008, and specifies that the Cap does not apply to any incentives earned for reporting under 2008 PQRI).