



2022 Eligible Measure Applicability (EMA) and Denominator Reduction User Guide: MIPS Quality Performance Category





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Purpose: This resource reviews the denominator reduction process available to clinicians, groups, virtual groups, and APM Entities with fewer than 6 measures available for reporting traditional MIPS.



How to Use This Guide



How to Use This Guide



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Please note: This guide was prepared for informational purposes only and isn't intended to grant rights or impose obligations. The information provided is only intended to be a general summary. It isn't intended to take the place of the written law, including the regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

Hyperlinks

Hyperlinks to the <u>Quality Payment Program website</u> are included throughout the guide to direct the reader to more information and resources.

COVID-19 and 2022 Participation

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The 2019 Coronavirus (COVID-19) public health emergency continues to impact clinicians across the United States and territories. However, we recognize that not all practices have been impacted by COVID-19 to the same extent. For the 2022 performance year, we'll continue to use our Extreme and Uncontrollable Circumstances policy to allow MIPS eligible clinicians, groups, virtual groups, and APM Entities to <u>submit an application</u> requesting reweighting of one or more MIPS performance categories to 0% due to the current COVID -19 public health emergency. The application will be available in spring of 2022 along with additional resources.

For more information about the impact of COVID-19 on Quality Payment Program (QPP) participation, see the QPP <u>COVID-19</u> <u>Response</u> webpage.



What Are the 2022 Performance Period Submission Requirements for the Quality Performance Category?

Unless you're reporting through the CMS Web Interface, the quality performance category data submission requirements are to:

- Submit 6 quality measures (200 are available for reporting) or a complete specialty measure set.
- 1 of these quality measures must be an outcome measure. If an outcome measure isn't available, then you must submit a high priority measure.

What Happens if I Don't Meet These Requirements?

If you submit fewer than 6 measures or submit 6 or more measures but no outcome or high priority measure, we apply the Eligible Measure Applicability (EMA) process. EMA is a denominator reduction process applied to qualifying submissions and determines if you reported all measures related to a clinical topic or within a specialty set.

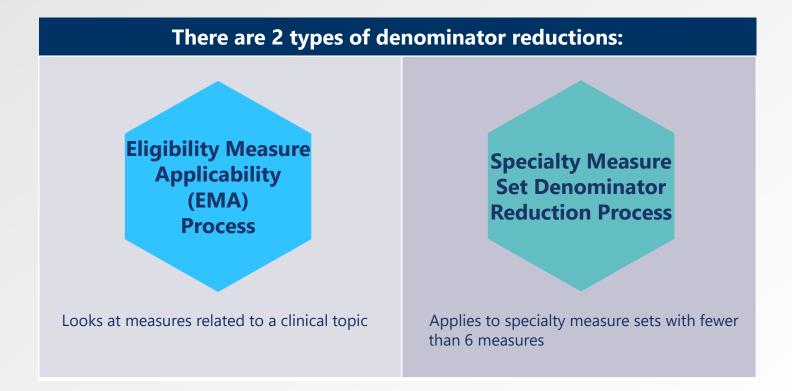
If the EMA process determines that you could have reported more measures, you'll receive 0 out of 10 points for each required measure that isn't submitted.

The EMA process is only applied to clinicians, groups, virtual groups, or APM Entities that:

 Report their quality measures for traditional MIPS through Medicare Part B claims or submit MIPS CQMs.

EMA isn't applied to eCQMs, QCDR measures, or submissions that include these collection types.

Denominator Reduction Paths



How Do Denominator Reductions Work?

- 1. We check that you reported Medicare Part B claims measures or MIPS CQMs.
- 2. We determine whether you reported all the measures available for your chosen collection type related to a clinical topic or in a specialty measure set with fewer than 6 measures.

Appendix A identifies the measures we have identified as related to specific clinical topics.

<u>Appendix B</u> identifies the specialty measure sets with fewer than 6 measures available for the Medicare Part B claims or MIPS CQM collection types.

How Can Denominator Reductions Affect My Quality Performance Category Score?

Quality Data You Submitted	Impact to Quality Performance Category Score	 Measures that don't meet
Fewer than 6 measures:	You may qualify for a denominator reduction . This means we would reduce the number of measures you're required to report. Your denominator for the quality performance category is 10 x number of required measures.	data completeness (70%) will earn 0 out of 10 points (3 points for small practices).
No outcome or high priority measure	You may qualify to earn achievement points for all 6 submitted measures. This means you wouldn't receive 0 out of 10 points for the unsubmitted outcome or high priority measure.	 Measures that meet data completeness but don't meet case minimum will earn 3 points.

No Denominator Eligible Instances (MIPS CQMs)

If the MIPS eligible clinician or group doesn't have any denominator eligible instances for a measure related to the clinical topic (or in a specialty measure set with fewer than 6 measures available for your chosen collection type), submit the MIPS CQM as 0/0 (0s in the numerator and denominator). We'll exclude these measures from the denominator.

If there are any denominator eligible instances, the measure must be reported as usual.

No supporting documentation is required at submission, as you must attest that data you submit has been validated and is true, accurate, and complete to the best of your knowledge. If you're selected for auditing, this may be one of the items audited to determine that the data submitted was true, accurate, and complete.

When Will I See Scoring Changes from a Denominator Reduction Applied to My Submission?

If you only submit MIPS CQMs, the denominator reduction process is applied at the point of submission and the results will be available immediately in preliminary scoring.

When you report Medicare Part B claims measures, the denominator reduction process is applied after the close of the submission period to ensure that all claims have been processed and attributed to your quality submission.

Scoring is updated each time a new submission is made, and real-time results are provided based on the submission data.

Please make sure to review your preliminary scoring and performance feedback as soon as it becomes available. If you reported all the measures (Medicare Part B claims or MIPS CQMs) available to you and don't see a denominator reduction when final performance feedback is available in summer 2023, please contact the Quality Payment Program as you may need to submit a Targeted Review. (Note that targeted reviews must be submitted within 60 days of the release of final performance feedback.)

Can We Choose to Submit Only the Measures Related to a Clinical Topic as Defined in <u>Appendix A</u>?

No. You should submit all quality measures that apply to your scope of practice and not limit your submission to those measures contained within the clinical topic. The EMA process was established to support clinicians and groups who may not have 6 quality measures available for, and applicable, to their practice.

When Are the Specialty Measure Sets and EMA Clinically Related Measures Updated?

Every year, we update the specialty measure sets through the rulemaking process. We receive stakeholder input through the annual specialty set solicitation process and public comments made in the Federal Register.

Every year, we update the measures related to a clinical topic through a sub-regulatory process. We get stakeholder input through collaborative review and feedback.

Help, Resources, and Version History

Help, Resources, and Version History

Where Can You Go for Help?

Contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8 a.m. – 8 p.m. ET or by email at: <u>QPP@cms.hhs.gov</u>

 Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant Visit the <u>Quality Payment</u> <u>Program website</u> for other <u>help and support</u> information, to learn more about <u>MIPS</u>, and to check out resources available in the <u>QPP Resource Library</u>.

Help, Resources, and Version History

Additional Resources

The following resources are available on the **<u>QPP Resource Library</u>**:

- 2022 MIPS Quality User Guide (PDF)
- 2022 MIPS Quality Measures List

Help, Resources, and Version History

Version History

If we need to update this document, changes will be identified here.

Date	Comments
3/25/2022	Original posting.

Appendix A: MIPS Clinically Related Measures Grouped by Clinical Topic

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Note: MIPS CQMs that don't have any eligible instances for a clinically related measure should be submitted as 0/0. Third party intermediaries don't need to submit anything else to CMS for this scenario as they attest that the data they submit has been validated and is true, accurate, and complete to the best of their knowledge. If the third party intermediary is selected for auditing, this may be one of the items audited to determine that the data submitted was true, accurate and complete.

Clinical Topic	MIPS CQM	Medicare Part B Claims
Anesthesiology Care (C)	 404**: Anesthesiology Smoking Abstinence 424**: Perioperative Temperature Management 430*: Prevention of Post-Operative Nausea and Vomiting (PONV) – Combination Therapy 463*: Prevention of Post-Operative Vomiting (POV) – Combination Therapy (Pediatrics) 	Not Applicable
CABG Care	 167**: Coronary Artery Bypass Graft (CABG): Postoperative Renal Failure 168**: Coronary Artery Bypass Graft (CABG): Surgical Re-Exploration 445**: Risk-Adjusted Operative Mortality for Coronary Artery Bypass Graft (CABG) 	Not Applicable
Cardiac Stress Imaging	 322*: Cardiac Stress Imaging Not Meeting Appropriate Use Criteria: Preoperative Evaluation in Low-Risk Surgery Patients 323*: Cardiac Stress Imaging Not Meeting Appropriate Use Criteria: Routine Testing After Percutaneous Coronary Intervention (PCI) 324*: Cardiac Stress Imaging Not Meeting Appropriate Use Criteria: Testing in Asymptomatic, Low-Risk Patients 	Not Applicable
Cataract Care	 191**: Cataracts: 20/40 or Better Visual Acuity within 90 Days Following Cataract Surgery 303**: Cataracts: Improvement in Patient's Visual Function within 90 Days Following Cataract Surgery 304*: Cataracts: Patient Satisfaction within 90 Days Following Cataract Surgery 389**: Cataract Surgery: Difference Between Planned and Final Refraction 	Not Applicable

*Denotes a High Priority Measure **Denotes an Outcome Measure (all outcome measures are high priority measures) (C) Denotes a <u>change</u> to the measures available for the clinical topic

Appendix A: MIPS Clinically Related Measures Grouped by Clinical Topic

*Denotes a High Priority Measure

****Denotes an Outcome Measure (all outcome measures are high priority measures)**

Clinical Topic	MIPS CQM	Medicare Part B Claims
Computed Tomography	 360*: Optimizing Patient Exposure to Ionizing Radiation: Count of Potential High Dose Radiation Imaging Studies: Computed Tomography (CT) and Cardiac Nuclear Medicine Studies 364*: Optimizing Patient Exposure to Ionizing Radiation: Appropriateness: Follow-up CT Imaging for Incidentally Detected Pulmonary Nodules According to Recommended Guidelines 405*: Appropriate Follow-up Imaging for Incidental Abdominal Lesions 406*: Appropriate Follow-up Imaging for Incidental Thyroid Nodules in Patients 436: Radiation Consideration for Adult CT: Utilization of Dose Lowering Techniques 	 405*: Appropriate Follow-up Imaging for Incidental Abdominal Lesions 406*: Appropriate Follow-up Imaging for Incidental Thyroid Nodules in Patients 436: Radiation Consideration for Adult CT: Utilization of Dose Lowering Techniques
Diagnostic Imaging (C)	 145*: Radiology: Exposure Dose Indices or Exposure Time and Number of Images Reported for Procedures Using Fluoroscopy 147*: Nuclear Medicine: Correlation with Existing Imaging Studies for All Patients Undergoing Bone Scintigraphy 	 145*: Radiology: Exposure Dose Indices or Exposure Time and Number of Images Reported for Procedures Using Fluoroscopy 147*: Nuclear Medicine: Correlation with Existing Imaging Studies for All Patients Undergoing Bone Scintigraphy
Endoscopy and Polyp Surveillance (C)	 185*: Colonoscopy Interval for Patients with a History of Adenomatous Polyps – Avoidance of Inappropriate Use 320*: Appropriate Follow-Up Interval for Normal Colonoscopy in Average Risk Patients 425: Photodocumentation of Cecal Intubation 439*: Age Appropriate Screening Colonoscopy 	320*: Appropriate Follow-Up Interval for Normal Colonoscopy in Average Risk Patients

Appendix A: MIPS Clinically Related Measures Grouped by Clinical Topic

*Denotes a High Priority Measure

****Denotes an Outcome Measure (all outcome measures are high priority measures)**

Clinical Topic	MIPS CQM	Medicare Part B Claims
Pathology (C)	 249: Barrett's Esophagus 250: Radical Prostatectomy Pathology Reporting 395*: Lung Cancer Reporting (Biopsy/Cytology Specimens) 396*: Lung Cancer Reporting (Resection Specimens) 397*: Melanoma Reporting 	 249: Barrett's Esophagus 250: Radical Prostatectomy Pathology Reporting 395*: Lung Cancer Reporting (Biopsy/Cytology Specimens) 396*: Lung Cancer Reporting (Resection Specimens) 397*: Melanoma Reporting
Pathology – Skin Cancer (C)	397*: Melanoma Reporting 440*: Skin Cancer: Biopsy Reporting Time – Pathologist to Clinician	397*: Melanoma Reporting
Surgical Care (C)	 355**: Unplanned Reoperation within the 30 Day Postoperative Period 357**: Surgical Site Infection (SSI) 358*: Patient-Centered Surgical Risk Assessment and Communication 	Not applicable
Internal Eye Care	 141**: Primary Open-Angle Glaucoma (POAG): Reduction of Intraocular Pressure (IOP) by 15% OR Documentation of a Plan of Care 384**: Adult Primary Rhegmatogenous Retinal Detachment Surgery: No Return to the Operating Room Within 90 Days of Surgery 385**: Adult Primary Rhegmatogenous Retinal Detachment Surgery: Visual Acuity Improvement Within 90 Days of Surgery 	Not Applicable
Interventional Radiology	 145*: Radiology: Exposure Dose Indices or Exposure Time and Number of Images Reported for Procedures Using Fluoroscopy 409**: Clinical Outcome Post Endovascular Stroke Treatment 413**: Door to Puncture Time for Endovascular Stroke Treatment 465*: Uterine Artery Embolization Technique: Documentation of Angiographic Endpoints and Interrogation of Ovarian Arteries 	145*: Radiology: Exposure Dose Indices or Exposure Time and Number of Images Reported for Procedures Using Fluoroscopy

Note: MIPS CQMs that don't have any eligible instances for a clinically related measure should be submitted as 0/0. Third party intermediaries don't need to submit anything else to CMS for this scenario as they attest that the data they submit has been validated and is true, accurate, and complete to the best of their knowledge. If the third party intermediary is selected for auditing, this may be one of the items audited to determine that the data submitted was true, accurate and complete. When reporting specialty measure sets, you're only accountable for the measures available through your chosen collection type for the specialty measure set. For example:

- The Anesthesiology specialty set is included in this appendix for the Medicare Part B claims measure collection type because only 1 of the 6 measures can be reported through Medicare Part B claims; however, all 6 measures can be reported as MIPS CQMs.
- The Hospitalist specialty set includes 3 measures if you're reporting Medicare Part B claims measures, and 5 measures if you're reporting MIPS CQMs.

(C) Denotes a <u>change</u> to the measures available in an existing specialty set with fewer than 6 measures
 (N) Denotes specialty sets <u>newly</u> identified as having fewer than 6 measures for the MIPS CQM and/or Medicare Part B claims measure collection types

Specialty Measure Set	MIPS CQMs	Medicare Part B Claims
Allergy/	Not Applicable	110: Preventive Care and Screening: Influenza Immunization
Immunology		111: Pneumococcal Vaccination Status for Older Adults
		130: Documentation of Current Medications in the Medical Record
		226: Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention
		317: Preventive Care and Screening: Screening for High Blood Pressure and Follow-Up Documented
Anesthesiology	Not Applicable	076: Prevention of Central Venous Catheter (CVC) - Related Bloodstream Infections
Certified Nurse	Not Applicable	047: Advance Care Plan
Midwives (N)		110: Preventive Care and Screening: Influenza Immunization
		130: Documentation of Current Medications in the Medical Record
		226: Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention

Specialty Measure Set	MIPS CQMs	Medicare Part B Claims
Clinical Social Work	Not Applicable	047: Advance Care Plan
		130: Documentation of Current Medications in the Medical Record
		134: Preventive Care and Screening: Screening for Depression and Follow-Up Plan
		181: Elder Maltreatment Screen and Follow-Up Plan
		226 : Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention
Dermatology	Not Applicable	130: Documentation of Current Medications in the Medical Record
		226 : Preventive Care and Screening Tobacco Use: Screening and Cessation Intervention
		317: Preventive Care and Screening: Screening for High Blood Pressure and Follow-Up Documented
Diagnostic Radiology (N)	Not applicable	145: Radiology: Exposure Dose Indices or Exposure Time and Number of Images Reported for Procedures Using Fluoroscopy
		147: Nuclear Medicine: Correlation with Existing Imaging Studies for All Patients Undergoing Bone Scintigraphy
		405: Appropriate Follow-up Imaging for Incidental Abdominal Lesions
		406: Appropriate Follow-up Imaging for Incidental Thyroid Nodules in Patients
		436: Radiation Consideration for Adult CT: Utilization of Dose Lowering Techniques
Electrophysiology	392 : Cardiac Tamponade and/or Pericardiocentesis Following Atrial Fibrillation Ablation	Not Applicable
	393: Infection within 180 Days of Cardiac Implantable Electronic Device (CIED) Implantation, Replacement, or Revision	

Specialty Measure Set	MIPS CQMs	Medicare Part B Claims
Emergency Medicine (C)	Not Applicable	317: Preventive Care and Screening: Screening for High Blood Pressure and Follow-Up Documented
		416: Emergency Medicine: Emergency Department Utilization of CT for Minor Blunt Head Trauma for Patients Aged 2 Through 17 Years
General Surgery (N)	Not Applicable	047: Advance Care Plan
		128: Preventive Care and Screening: Body Mass Index (BMI) Screening and Follow-Up Plan
		130: Documentation of Current Medications in the Medical Record
		226: Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention
		317: Preventive Care and Screening: Screening for High Blood Pressure and Follow-Up Documented
Hospitalists	005 : Heart Failure (HF): Angiotensin- Converting Enzyme (ACE) Inhibitor or Angiotensin Receptor Blocker (ARB) or Angiotensin Receptor-Neprilysin Inhibitor	047: Advance Care Plan
		076 : Prevention of Central Venous Catheter (CVC) - Related Bloodstream Infections
	(ARNI) Therapy for Left Ventricular Systolic Dysfunction (LVSD)	130: Documentation of Current Medications in the Medical Record
	008: Heart Failure (HF): Beta-Blocker Therapy for Left Ventricular Systolic Dysfunction (LVSD)	
	047: Advance Care Plan	
	076: Prevention of Central Venous Catheter (CVC) - Related Bloodstream Infections	
	130: Documentation of Current Medications in the Medical Record	

Specialty Measure Set	MIPS CQMs	Medicare Part B Claims
Infectious Disease	Not Applicable	110: Preventive Care and Screening: Influenza Immunization
		111: Pneumococcal Vaccination Status for Older Adults
		130: Documentation of Current Medications in the Medical Record
Interventional Radiology	Not Applicable	076: Prevention of Central Venous Catheter (CVC) - Related Bloodstream Infections
		145: Radiology: Exposure Dose Indices or Exposure Time and Number of Images Reported for Procedures Using Fluoroscopy
Neurosurgical (C)	Not Applicable	130: Documentation of Current Medications in the Medical Record
		226 : Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention
Nutrition/Dietician (C)	Not Applicable	128: Preventive Care and Screening: Body Mass Index (BMI) Screening and Follow-Up Plan
		130: Documentation of Current Medications in the Medical Record
		181: Elder Maltreatment Screen and Follow-Up Plan
Ophthalmology (C)	Not Applicable	117: Diabetes: Eye Exam
		130: Documentation of Current Medications in the Medical Record
		141: Primary Open-Angle Glaucoma (POAG): Reduction of Intraocular Pressure (IOP) by 15% OR Documentation of a Plan of Care
		226: Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention
Pathology	Not Applicable	249: Barrett's Esophagus
		250: Radical Prostatectomy Pathology Reporting
		395: Lung Cancer Reporting (Biopsy/Cytology Specimens)
		396: Lung Cancer Reporting (Resection Specimens)
		397: Melanoma Reporting

Specialty Measure Set	MIPS CQMs	Medicare Part B Claims
Pediatrics (C)	Not Applicable	110: Preventive Care and Screening: Influenza Immunization
		134: Preventive Care and Screening: Screening for Depression and Follow-Up Plan
Plastic Surgery (C)	Not Applicable	128: Preventive Care and Screening: Body Mass Index (BMI) Screening and Follow-Up Plan
		130: Documentation of Current Medications in the Medical Record
		226: Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention
		317 : Preventive Care and Screening: Screening for High Blood Pressure and Follow-Up Documented
Podiatry (C)	126: Diabetes Mellitus: Diabetic Foot and Ankle Care, Peripheral Neuropathy – Neurological Evaluation	128: Preventive Care and Screening: Body Mass Index (BMI) Screening and Follow-Up Plan
	127: Diabetes Mellitus: Diabetic Foot and Ankle Care,	155: Falls: Plan of Care
	Ulcer Prevention – Evaluation of Footwear	226: Preventive Care and Screening: Tobacco Use:
	128: Preventive Care and Screening: Body Mass Index (BMI) Screening and Follow-Up Plan	Screening and Cessation Intervention
	155: Falls: Plan of Care	
	226: Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention	
Radiation Oncology	102: Prostate Cancer: Avoidance of Overuse of Bone Scan for Staging Low Risk Prostate Cancer Patients	Not Applicable
	143: Oncology: Medical and Radiation – Pain Intensity Quantified	
	144: Oncology: Medical and Radiation – Plan of Care for Pain	

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Specialty Measure Set	MIPS CQMs	Medicare Part B Claims
Speech Language Pathology (C)	130: Documentation of Current Medications in the Medical Record	130: Documentation of Current Medications in the Medical Record
	134: Preventive Care and Screening: Screening for Depression and Follow-Up Plan	134: Preventive Care and Screening: Screening for Depression and Follow-Up Plan
	181: Elder Maltreatment Screen and Follow-Up Plan	181: Elder Maltreatment Screen and Follow-Up Plan
	182: Functional Outcome Assessment	226: Preventive Care and Screening: Tobacco Use:
	226: Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention	Screening and Cessation Intervention
Thoracic Surgery (N)	Not Applicable	047: Advance Care Plan
		130: Documentation of Current Medications in the Medical Record
		226: Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention
Urgent Care (C)	Not Applicable	130: Documentation of Current Medications in the Medical Record
		226: Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention
		317: Preventive Care and Screening: Screening for High Blood Pressure and Follow-Up Documented
Urology (N)	Not Applicable	047: Advance Care Plan
		128: Preventive Care and Screening: Body Mass Index (BMI) Screening and Follow-Up Plan
		130: Documentation of Current Medications in the Medical Record
		226: Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention
		317: Preventive Care and Screening: Screening for High Blood Pressure and Follow-Up Documented