

## Depression Measure

# Merit-based Incentive Payment System (MIPS): Measure Information Form

2025 Performance Period

# Table of Contents

<b>1.0</b>	<b>Introduction .....</b>	<b>3</b>
1.1	Measure Name .....	3
1.2	Measure Description .....	3
1.3	Measure Rationale .....	3
1.4	Measure Numerator .....	5
1.5	Measure Denominator .....	5
1.6	Data Sources .....	5
1.7	Care Settings .....	5
1.8	Cohort .....	5
<b>2.0</b>	<b>Methodology Steps.....</b>	<b>6</b>
<b>3.0</b>	<b>Measure Specifications Quick Reference.....</b>	<b>8</b>
<b>4.0</b>	<b>Detailed Measure Methodology.....</b>	<b>10</b>
4.1	Identify Patients Receiving Care .....	10
4.2	Identify the Total Length of Care Between a Patient and a Clinician Group .....	11
4.3	Define an Episode.....	12
4.4	Attribute the Episode to a Clinician Group or a Clinician.....	13
4.5	Assign Costs to an Episode and Calculate Episode Scaled Observed Costs.....	14
4.6	Exclude Episodes.....	16
4.7	Estimate Scaled Expected Costs for Risk Adjustment.....	16
4.8	Calculate Measure Score .....	18
<b>Appendix A. Example Illustrations of Scenarios for Episode Construction and Assignment of Days .....</b>		<b>20</b>
A.1.	Simple Example of Defining an Episode.....	20
A.2.	Episode Construction Examples .....	20
<b>Appendix B. Illustration of Attribution to Individual Clinicians (TIN-NPI).....</b>		<b>24</b>
<b>Appendix C. Measure Calculation Example .....</b>		<b>25</b>

# 1.0 Introduction

This document details the methodology for the Depression measure and should be reviewed along with the Depression Measure Codes List file, which contains the medical codes used in constructing the measure.

## 1.1 Measure Name

Depression episode-based cost measure

## 1.2 Measure Description

Episode-based cost measures represent the cost to Medicare for the items and services provided to a patient during an episode of care (“episode”). In all supplemental documentation, the term “cost” generally means the standardized<sup>1</sup> Medicare allowed amount,<sup>2</sup> and claims data from Medicare Parts A, B, and D<sup>3</sup> are used to construct this episode-based cost measure.

The Depression episode-based cost measure evaluates a clinician’s or clinician group’s risk-adjusted and specialty-adjusted cost to Medicare for patients receiving medical care to manage and treat depression. This chronic condition measure includes the costs of services that are clinically related to the attributed clinician’s role in managing care during a Depression episode.

## 1.3 Measure Rationale

An estimated 13% of all Medicare patients age 65 or older experience depression,<sup>4</sup> and prevalence of diagnosed major depressive disorder among older adults ranges from 5-10% in primary care settings and up to 10-42% in inpatient and long-term care settings,<sup>5</sup> with highest overall prevalence of major depressive disorder being among the oldest age group of patients

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<sup>1</sup> Claim payments are standardized to account for differences in Medicare payments for the same service(s) across Medicare providers. Payment standardized costs remove the effect of differences in Medicare payment among health care providers that are the result of differences in regional health care provider expenses measured by hospital wage indexes and geographic price cost indexes or other payment adjustments such as those for teaching hospitals. For more information, please refer to the “CMS Part A and Part B Price (Payment) Standardization - Basics” and “CMS Part A and Part B Price (Payment) Standardization - Detailed Methods” documents posted on the [CMS Price \(Payment\) Standardization Overview](https://www.resdac.org/articles/cms-price-payment-standardization-overview) page (<https://www.resdac.org/articles/cms-price-payment-standardization-overview>).

Claim payments from Part D are payment standardized to allow resource use comparisons for providers who prescribe the same drug, even if the drug products are covered under varying Part D plans, produced by different manufacturers, or dispensed by separate pharmacies. For more information, please refer to the “CMS Part D Price (Payment) Standardization” document posted on the [CMS Price \(Payment\) Standardization Overview page](https://www.resdac.org/articles/cms-price-payment-standardization-overview). (<https://www.resdac.org/articles/cms-price-payment-standardization-overview>).

<sup>2</sup> Cost is defined by allowed amounts on Medicare claims data, which include both Medicare trust fund payments and any applicable beneficiary deductible and coinsurance amounts.

<sup>3</sup> Part D branded drug costs are also adjusted to account for post-point of sale drug rebates; more information can be found in the Methodology for Incorporation of Rebates in Part D Standardized Amounts on the [QPP Cost Measure Information "About Cost Measures" page](https://www.cms.gov/medicare/quality-payment-program/cost-measures/about) (<https://www.cms.gov/medicare/quality-payment-program/cost-measures/about>).

<sup>4</sup> Ewald E, Loganathan S, Hache J, Lochner K. Access to Care Among Medicare Beneficiaries With and Without Depression. Medicare Current Beneficiary Survey. 2017. [https://www.cms.gov/Research-Statistics-Data-and-Systems/Research/MCBS/Downloads/ATC\\_Depression\\_2017.pdf](https://www.cms.gov/Research-Statistics-Data-and-Systems/Research/MCBS/Downloads/ATC_Depression_2017.pdf)

<sup>5</sup> McQuaid, JR, Lin EH, Barber JP, et al. 2019. Clinical Practice Guideline for the Treatment of Depression Across Three Age Cohorts. American Psychological Association, Guideline Development Panel for the Treatment of Depressive Disorders.

90 years or older.<sup>6</sup> Beyond considering the impacts and costs of treatment for depression itself, findings from the literature report that patients with depression are more likely to utilize health care services and resources for other types of medical illness beyond just mental health disorders compared to patients without depression,<sup>7</sup> and the average total health care costs for patients with depression aged 60 or older are greater compared to those without depression.<sup>8</sup>

Research has also indicated that the integration of primary care and mental health care could reduce spending and lead to improvements in the management, treatment, and quality of care for patients with mental health disorders and chronic conditions,<sup>9</sup> and specifically that ongoing depression disease management for patients with major depression can increase clinical improvement and be less costly overtime.<sup>10</sup> In addition to improving care integration, research indicates another opportunity for improvement in effective case management to improve medication and treatment adherence. A 2020 paper indicated that that over half of patients with major depressive disorder do not adhere to prescribed medications (i.e., antidepressants), both in the primary care and psychiatric settings.<sup>11</sup> which may be due both to patient-related factors (i.e., due to concerns about side-effects, cultural issues, costs<sup>12,13</sup>), as well as factors that clinicians can influence, such as inadequate patient education, lack of shared decision-making, and lack of follow-up.<sup>14</sup>

Given the prevalence of major depressive disorder in the Medicare population, and the high costs associated with the management of the disease and its complications, the Depression cost measure represents an opportunity for improvement on overall cost performance. The Depression episode-based cost measure was selected for development because of its high impact in terms of patient population, clinician coverage, and Medicare spending, and the opportunity build a complex, yet feasible, chronic condition measure that would address a condition not captured by other cost measures. Following initial feedback gathered during the

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<sup>6</sup> Bashyal R, Du H, Wang L, Yuce H, Baser O. PMH17 – Mortality and Prevalence of Major Depressive Disorder in the US Medicare Population from 2008-2013. *Value in Health*. 2016; 19(3): A184.

<sup>7</sup> Zivin K, Wharton T, Rostant O. The Economic, Public Health, and Caregiver Burden of Late-Life Depression. *Psychiatric Clinics of North America*. 2013; 36(4): 631-649.

<sup>8</sup> Katon WJ, Lin E, Russo J, et al. Increased Medical Costs of a Population-Based Sample of Depressed Elderly Patients. *JAMA Psychiatry*. 2003; 60(9):897-903.

<sup>9</sup> Bao Y, Casalino LP, Pincus HA. Behavioral Health and Health Care Reform Models: Patient-Centered Medical Home, Health Home, and Accountable Care Organization. *Journal of Behavioral Health Services and Research*. 2013; 40(1):121-132.

<sup>10</sup> Rost K, Pyne J, Dickinson LM, LoSasso A. Cost-Effectiveness of Enhancing Primary Care Depression Management on an Ongoing Basis. *Annals of Family Medicine*. 2005; 3(1): 7-14.

<sup>11</sup> Dell'Osso B, Albert U, Carra G, et al. How to Improve Adherence to Antidepressant Treatments in Patients with Major Depression: A Psychoeducational Consensus Checklist. *Annals of General Psychiatry*. 2020; 19(61).

<sup>12</sup> Piette JD, Heisler M, Wagner TH. Cost-Related Medication Underuse Among Chronically Ill Adults: The Treatments People Forgo, How Often, And Who Is At Risk. *American Journal of Public Health*. 2004;94:1782-1787.

<sup>13</sup> Bambauer KZ, Safran DG, Ross-Degnan D, et al. Depression and Cost-Related Medication Nonadherence in Medicare Beneficiaries. *JAMA Psychiatry*. 2007; 64(5):602-608.

<sup>14</sup> Dell'Osso B, Albert U, Carra G, et al. How to Improve Adherence to Antidepressant Treatments in Patients with Major Depression: A Psychoeducational Consensus Checklist. *Annals of General Psychiatry*. 2020; 19(61).

Wave 4 public comment period,<sup>15</sup> the subsequent measure-specific clinician expert workgroup provided extensive, detailed input on this measure.

## **1.4 Measure Numerator**

The measure numerator is the weighted average ratio of the winsorized<sup>16</sup> scaled standardized observed cost to the scaled expected<sup>17</sup> cost for all Depression episodes attributed to a clinician, where each ratio is weighted by each episode's number of days assigned to a clinician. This sum is then multiplied by the national average winsorized scaled observed episode cost to generate a dollar figure.

## **1.5 Measure Denominator**

The measure denominator is the total number of days from Depression episodes assigned to the clinician across all patients.

## **1.6 Data Sources**

The Depression measure uses the following data sources:

- Medicare Part A, B, and D claims data from the Common Working File (CWF)
- Enrollment Database (EDB)
- Long Term Care Minimum Data Set (LTC MDS)<sup>18</sup>

## **1.7 Care Settings**

The Depression measure focuses on the care provided by clinicians practicing in non-inpatient hospital settings for patients with depression. The most frequent settings in which a Depression episode is triggered include: office, nursing facility, skilled nursing facility (SNF), and outpatient hospital.

## **1.8 Cohort**

The cohort for this cost measure consists of patients who are Medicare beneficiaries enrolled in Medicare fee-for-service that receive care for depression.

The cohort for this cost measure is also further refined by the definition of the episode group and measure-specific exclusions (refer to Section 4).

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<sup>15</sup> "Wave 4 Public Comment Summary," QPP Cost Measure Information, Prior cost measure development and input, (<https://www.cms.gov/medicare/quality-payment-program/cost-measures/prior>)

<sup>16</sup> For information on how costs are winsorized, please refer to Section 4.7.

<sup>17</sup> Expected costs refer to costs predicted by the risk adjustment model. For more information on expected costs and risk adjustment, please refer to Section 4.7.

<sup>18</sup> For information on how LTC MDS data are used in risk adjustment, please refer to Section 4.7.

## 2.0 Methodology Steps

There are 2 overarching processes in calculating chronic condition episode-based cost measure scores: episode construction (Steps 1-5) and measure calculation (Steps 6-8). This section provides a brief summary of these processes for the Depression measure. Section 4 describes the processes in detail and further defines the related concepts.

- 1. Identify patients receiving care:** A trigger event identifies the start or continuation of a clinician group's management of a patient's chronic condition. A trigger event is identified by the occurrence of 2 Part B Physician/Supplier (Carrier) claims billed by the same clinician group practice within 180 days of one another. The pair of services must include a trigger claim and a confirming claim. The trigger claim is any code from a set of CPT/HCPCS codes for clinically relevant outpatient services when accompanied by an ICD-10 diagnosis code indicating depression. The confirming claim is the instance of another trigger code. Once a trigger event is identified, this opens a one-year attribution window from the point of the trigger claim, in which the patient's chronic condition care will be monitored by a clinician group.
- 2. Identify the total length of care between a patient and a clinician group:** Once an attribution window is opened, it continues for 1 year unless there is a service that demonstrates a continuing care relationship, also known as a reaffirming claim. This service is billed during an open attribution window (from Step 1) by the same clinician group that billed the trigger event, and reaffirms and extends a clinician group's responsibility for managing a patient's chronic condition. A reaffirming claim is another instance any confirming code.<sup>19</sup> After a reaffirming claim is identified, the attribution window is extended by 1 year from the point of each reaffirming claim billed during an open attribution window. The total attribution window begins with the trigger claim and concludes 1 year after the final reaffirming claim. Therefore, the total attribution window can span multiple years and vary in length for different patients. This requires that the total attribution window is measured incrementally and periodically across multiple measurement periods.
- 3. Define an episode:** Episodes are segments of the total attribution window that are counted in a particular measurement period, allowing clinicians to have their costs for Depression episodes assessed for that year. Episodes are assigned to a clinician group (identified by Tax Identification Number [TIN]) or individual clinicians (identified by combination of TIN and National Provider Identifier [TIN-NPI]), and can vary in length. Episodes are assessed in the measurement period in which they conclude and only attribute days not previously measured in preceding measurement periods, so there is no double counting of episode costs.
- 4. Attribute the episode to the clinician group and clinician(s):** The episode is attributed to the clinician group that bills the trigger and confirming claims for the total attribution window. To attribute the episode to an individual clinician, any clinician within the attributed clinician group who plays a substantial role in the care for the patient (i.e., billing at least 30% of trigger or confirming codes on Part B Physician/Supplier claim lines during the episode) is attributed the episode. There are also additional checks to ensure that clinicians are not attributed to an episode before they have their first encounter with the patient.

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<sup>19</sup> While a trigger event requires two claims, a single reaffirming claim is needed to extend a clinician group's responsibility for managing a patient's chronic condition. This is because workgroups who have developed chronic condition measures to-date have favored a less strict reaffirming algorithm, indicating that once a clinician-patient relationship was established, a single reaffirming claim would be sufficient to extend the attribution window.

- 5. Assign costs to the episode and calculate the episode scaled observed cost:** Services that are clinically related to the care and management of a patient's chronic condition that occur during the episode are included in the measure. The standardized cost of the assigned services is summed and averaged across the number of days in an episode. This average daily cost is then multiplied by 365 to determine each episode's scaled (i.e., annualized) standardized observed cost.
- 6. Exclude episodes:** Exclusions remove unique groups of patients or episodes from cost measure calculation in cases where it may be impractical or unfair to compare the costs of caring for these patients to the costs of caring for the cohort at large.
- 7. Calculate the scaled expected cost for risk adjustment:** Risk adjustment predicts the expected costs by adjusting for factors outside of the clinician's or clinician group's reasonable influence (e.g., patient age, comorbidities, dual Medicare and Medicaid eligibility status, clinician specialty, and other factors). The episode group's scaled standardized observed costs are winsorized at the 98<sup>th</sup> percentile for each model to handle extreme observations. A regression is then run using the risk adjustment variables as covariates to estimate the expected cost of each episode. Further statistical techniques are applied to reduce the effects of extreme outliers on measure scores.
- 8. Calculate the measure score:** For each episode, the ratio of winsorized scaled standardized observed cost to scaled expected cost (both of which are from Step 7) is calculated. The measure is calculated as a weighted average of these ratios across all of a clinician's or clinician group's attributed episodes, where the weighting is each episode's number of assigned days. The weighted average episode cost ratio is then multiplied by the national average winsorized scaled observed episode cost to generate a dollar figure for the cost measure score.

## 3.0 Measure Specifications Quick Reference

This page provides a quick, at-a-glance reference for the Depression measure specifications. More details on each component can be found in Section 4, and the full list of codes and logic used to define each component can be found within the Depression Measure Codes List file.

### **Episode Window:** During what time period are costs measured?

An episode is a segment of time during which clinicians or clinician groups are assessed for the care that they provide to a patient with depression.

- The episode window length for the Depression measure is between 1 year (365 days) and 2 years minus 1 day (729 days), and can vary in length across patients.

### **Triggers:** How does the measure identify the patient cohort and start of care?

- Patients receiving medical care for treatment of their depression are included in the measure.
- The start or continuation of a clinician group's management of a patient's depression is identified by the appearance of a pair of services within 180 days of one another: a **trigger code** followed by a **confirming code**. For the Depression measure:
  - A **trigger code** is any code from a set of CPT/HCPCS codes for clinically relevant outpatient services (outpatient E/Ms, behavioral health visits, collaborative care management, brain stimulation therapy, chronic care management, complex chronic care E/M, telehealth visits, in-home visits) when accompanied by an ICD-10 diagnosis code indicating depression.
  - A **confirming code** is any code from the same trigger set of CPT/HCPCS codes for clinically relevant outpatient services when accompanied by an ICD-10 diagnosis code indicating depression.

### **Sub-Groups:** Is the measure stratified into smaller patient cohorts?

1. Depression with Psychotic Features
2. Depression without Psychotic Features

### **Service Assignment:** Which clinically related costs are included in the measure?

Assigned services generally fall within the following clinical themes:

- Outpatient Services and Psychotherapy
- Outpatient Infusions and Diagnostics (Laboratory, Imaging, EEG)
- (Re)admissions, ED Visits, Other
- Transportation
- Post-Acute Care and Ancillary Services

### **Risk Adjustors:** Which risk factors are accounted for in the risk adjustment model?

- Standard risk adjustors, including comorbidities captured by 86 Hierarchical Condition Category (HCC) codes that map with thousands of ICD-10-CM diagnosis codes, count of HCCs, interaction variables accounting for a range of comorbidities, patient age category, patient disability status, patient end-stage renal disease (ESRD) status, patient dual eligibility status, number and types of clinician specialties from which the patient has received care, and recent use of institutional long-term care.
- Risk adjustors for factors specific to this condition: two or more hospitalizations related to depression in the prior year, memory loss, eating disorders, chronic pain, suicide ideation, recent suicide attempt, esketamine within the last year, transcranial magnetic stimulation (TMS) within the last year, electroconvulsive therapy (ECT) within the last year, and prior observation stays that may indicate treatment-resistant depression (TRD). For the full list of

standard and measure-specific risk adjustment variables, please reference the “RA” and “RA\_Details” tabs of the Measure Codes List file.

- A separate linear regression is run for each sub-group and Medicare Part D enrollment status combination to ensure fair comparison. The episode group’s scaled (i.e., annualized) observed costs are winsorized at the 98<sup>th</sup> percentile prior to the regression for each model to handle extreme observations.

**Exclusions:** Which populations are excluded from the measure?

- Measure-specific exclusions including bipolar disorder, schizophrenia, and drug or alcohol psychosis. For the full list of measure-specific exclusions, please reference the “Exclusions” and “Exclusions\_Details” tabs of the Measure Codes List file.
- Standard exclusions to ensure data completeness:
  - The patient has a primary payer other than Medicare for any time overlapping the episode window or 120-day lookback period prior to the episode window.
  - The patient was not enrolled in Medicare Parts A and B for the entirety of the 120-day lookback period plus episode window, or was enrolled in Part C for any part of the lookback plus episode window.
  - The patient was not found in the Medicare Enrollment Database (EDB).
  - The patient’s death date occurred before the episode end date.
  - The patient has an episode window shorter than one year.
  - The patient has extremely low treatment costs.
  - The patient resided outside the United States or its territories during the episode window.

## 4.0 Detailed Measure Methodology

This section contains the technical details for the 2 overarching processes in calculating the Depression cost measure in more detail: Sections 4.1 through 4.5 describe episode construction, and Sections 4.6 through 4.8 describe measure calculation.

### 4.1 Identify Patients Receiving Care

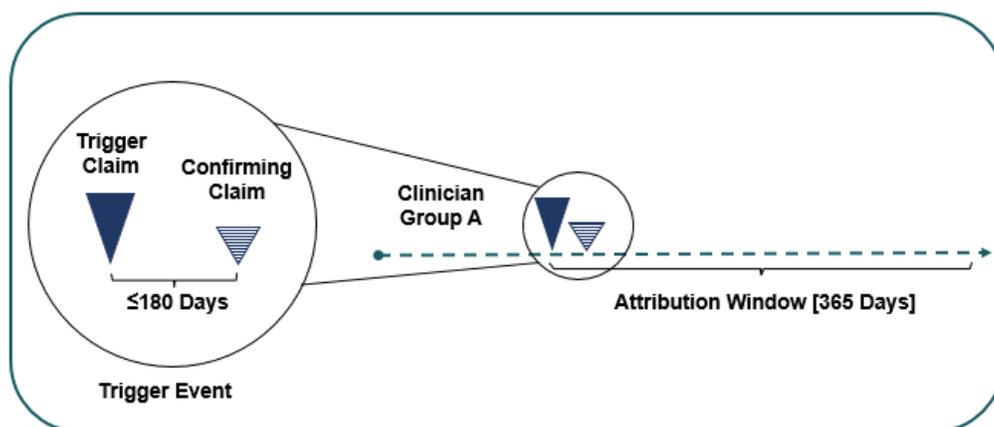
A **trigger event** is used to indicate the start of a clinician group's management of a patient's depression and is identified by the occurrence of 2 Part B Physician/Supplier (Carrier) claims billed by the same clinician group practice. To identify a trigger event, the following 2 claims must be billed within the trigger window (within 180 days of one another): a **trigger claim**, followed by a **confirming claim**.

- A **trigger claim** is a Part B Physician/Supplier claim that contains a trigger code. For the Depression measure, a trigger code is:
  - Any code from a set of CPT/HCPCS codes for clinically relevant outpatient services when accompanied by an ICD-10 diagnosis code indicating depression. These outpatient services can be summarized as:
    - Outpatient evaluation and management (E/M) codes
    - Behavioral health visits
    - Collaborative care management
    - Brain stimulation therapy
    - Chronic care management
    - Complex chronic care E/Ms
    - Telehealth visits
    - In-home visits
- A **confirming claim** is a second Part B Physician/Supplier claim billed by the same clinician group practice as the trigger claim, which contains a confirming code. For the Depression measure, a confirming code is:
  - Any code from the same set of CPT/HCPCS codes for clinically relevant outpatient services when accompanied by an ICD-10 diagnosis code indicating depression, as listed above in trigger codes.

For the full list of trigger and confirming codes, as well as the requisite diagnosis codes, please refer to the "Trigger\_Confirming" and "Trigger\_DGN" tabs of the Depression Measure Codes List file.

Once the trigger event is identified, the trigger event opens an **attribution window**, which is a year-long time period that begins on the date of the trigger claim. The attribution window defines a time period during which the patient's depression care will be monitored by a clinician group.

Figure 1. Trigger Event and Attribution Window



## 4.2 Identify the Total Length of Care Between a Patient and a Clinician Group

When the beginning of the clinician-patient relationship is identified, there might be evidence of a continuation of this relationship, as identified by reaffirming claims. A **reaffirming claim** is a service billed during an open attribution window by the same clinician group that billed the trigger event, and it reaffirms and extends a clinician group’s responsibility for managing a patient’s depression. A reaffirming claim has the same definition as a confirming claim as defined in Section 4.1, meaning that a reaffirming claim is:

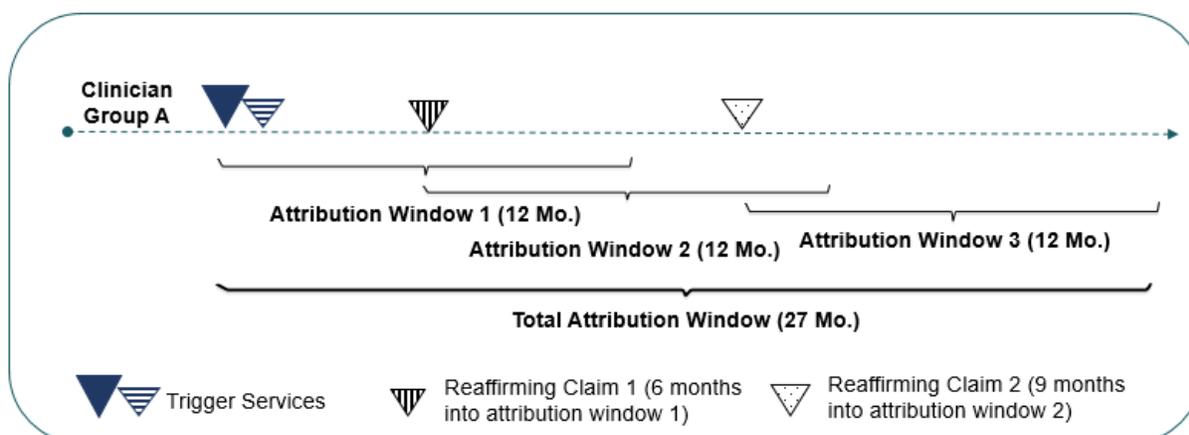
- Any code from the set of trigger CPT/HCPCS codes for clinically relevant outpatient services when accompanied by an ICD-10 diagnosis code indicating depression. These outpatient services can be summarized as:
  - Outpatient E/Ms
  - Behavioral health visits
  - Collaborative care management
  - Brain stimulation therapy
  - Chronic care management
  - Complex chronic care E/Ms
  - Telehealth visits
  - In-home visits

Each time a reaffirming claim is identified during an open attribution window, the attribution window will be extended by 1 year from the point of the reaffirming claim. The resulting overall time period of responsibility is defined as the **total attribution window**, which begins with the trigger claim and concludes 1 year after the final reaffirming claim. Therefore, the total attribution window can span multiple years and vary in length for different patients. Appendix A contains an illustration of the relationship between a trigger event, reaffirming claims, and a total attribution window.

Figure 2 below contains an example illustration of the relationship between a trigger event, reaffirming claims, and a total attribution window. In this hypothetical example, reaffirming claim 1 occurs 6 months into attribution window 1 and extends that attribution window by 1 year (until the end of attribution window 2), and then reaffirming claim 2 occurs 9 months into attribution window 2, extending that attribution window by another year (until the end of attribution window 3). Once all reaffirming claims are identified, the total period of time of the clinician-patient relationship is defined as the period covered by all attribution windows, beginning with the

trigger claim and concluding 1 year after the final reaffirming claim. For this example, the total attribution window is 27 months long.

**Figure 2. Example of Reaffirming Claims and Total Attribution Window**



### 4.3 Define an Episode

Once the total attribution window has been constructed, it is divided into segments of time, also known as episodes. Episodes allow the measure to be calculated for a given measurement period, which is a static year-long period (i.e., calendar year) in which a clinician or clinician group will be measured.

An **episode** is defined, at a minimum, as a one-year segment of the total attribution window. Episodes are assessed in the measurement period in which they end and only include days not previously measured in preceding measurement periods. Clinicians or clinician groups are measured on a patient at the end of the calendar year if there are at least 365 days' worth of claims data that has not previously been assessed or when the total attribution window ends, ensuring that costs are only assessed once. The episode window lengths may vary depending on the length of the total attribution window and the number of days that have not been assessed in preceding measurement periods.

After the episode windows are constructed, the number of assigned days for each episode is determined and used as a weighting factor in the measure score calculation step. This weighting is done to ensure fair comparison across episodes, where cost is effectively scaled respective to the episode length to allow like comparisons between episodes of similar length. Appendix A contains a simplified example of episode construction, as well as a more detailed illustration of episode construction and assignment of days.

1. 365-day episode window, where there are no reaffirming claims during the year-long total attribution window
  - The episode **start date** is set as the start date of the total attribution window.
  - The episode **end date** is set as 365 days after the episode start date.
  - **Assign** the total number of days that have not been previously measured in the preceding episodes. In this case, the number of assigned days equals the number of days in the episode.
2. 366- to 729-day episode window, where reaffirming claims extend the total attribution window to greater than one year
  - The episode **start date** is set as the start date of the total attribution window.
  - The episode **end date** is set as either:

- The end of the total attribution window (which is 366 to 729 days after the episode start date), if the total attribution window ends by December 31 of the next calendar year (i.e., the measurement year);
    - December 31 of the next full calendar year (which is 366 to 729 days after the episode start date), if the total attribution window extends beyond December 31 of the next calendar year (i.e., the measurement year).
  - **Assign** the total number of days that have not been previously measured in the preceding episodes. In this case, the number of assigned days equals the number of days in the episode.
3. 365-day episode window, where reaffirming events have resulted in a total attribution window that is at least two years in length that can be split into 365-day segments across multiple measurement periods
    - The episode **start date** is set as the beginning of a new calendar year (January 1) if it is a subsequent episode with at least 365 days' worth of claims data not captured in a preceding measurement period.
    - The episode **end date** is set as 365 days after the episode start date, at the end of that calendar year (December 31).
    - **Assign** the total number of days that have not been previously measured in the preceding episodes. In this case, the number of assigned days equals the number of days in the episode.
  4. 365-day episode window, where the total attribution window concludes after a segment was measured in the previous measurement period
    - The episode **start date** is set as 365 days prior to the total attribution window end date if the remaining number of assigned days in the total attribution window is less than 365 days.
    - The episode **end date** is set as the end date of the total attribution window.
    - **Assign** the total number of days that have not been previously measured in the preceding episodes. In this case, the number of assigned days is smaller than the number of days in the episode, since the episode window would partially overlap with the preceding episode window. Only days not previously measured are assigned to the episode. This is done to ensure there is no double counting of episode costs.

Once a Depression episode window is defined, the episode is placed into one of the episode sub-groups to enable meaningful clinical comparisons. Sub-groups represent more granular, mutually exclusive and exhaustive patient populations defined by clinical criteria. Sub-groups are useful in ensuring clinical comparability so that the corresponding cost measure fairly compares clinicians with a similar patient case-mix.

Codes used to define the sub-groups can be found in the “Sub\_Groups” and “Sub\_Groups\_Details” tabs of the Depression Measure Codes List file. This cost measure has 2 sub-groups:

- Depression with Psychotic Features
- Depression without Psychotic Features

#### 4.4 Attribute the Episode to a Clinician Group or a Clinician

Once an episode has been defined, it is attributed to one or more clinicians of a specialty that is eligible for MIPS. The episodes are attributed to clinician groups, who are identified by their unique TIN, and individual clinicians, who are identified by their TIN and NPI pair (TIN-NPI). For codes relevant to this section, please refer to the “Attribution” tab of the Depression Measure Codes List file.

**TIN level attribution:** An episode is attributed to the clinician group that billed the trigger event (trigger and confirming claims) for the total attribution window. The clinically related costs from the total number of assigned days are attributed to that clinician group.

**TIN-NPI level attribution:** An episode is attributed to any clinician within the attributed clinician group that billed at least 30% of the trigger or confirming codes on Part B Physician/Supplier claim lines during the episode.<sup>20</sup> The measure's attribution methodology also imposes additional checks to ensure that TIN-NPIs are appropriately attributed. Specifically, TIN-NPIs that meet the 30% threshold must have billed at least one trigger or confirming code within 1 year prior to or on the episode start date.

Future attribution rules may benefit from the implementation of patient relationship categories<sup>21</sup> and codes.<sup>22</sup> As required by section 101(f) of the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA), the Centers for Medicare & Medicaid Services (CMS) will consider how to incorporate the patient relationship categories into episode-based cost measurement methodology as clinicians and billing experts gain experience with them.<sup>23</sup>

## 4.5 Assign Costs to an Episode and Calculate Episode Scaled Observed Costs

Medicare Parts A, B, and D services, and their costs, are assigned to an episode only when clinically related to the management and treatment of the patient's depression during the episode. Assigned services may include treatment and diagnostic services, ancillary items, services directly related to treatment, and those furnished as a consequence of care (e.g., complications, readmissions, unplanned care, and emergency department visits). Unrelated services are not assigned to the episode. For example, the cost of care for a procedure that occurs during the episode that is not clinically related to the management and treatment of the patient's depression (i.e., a knee arthroplasty) would not be assigned to the episode.

To ensure that only clinically related services are included, services during the episode window are assigned to the episode based on a series of service assignment rules, which are listed in the "Service\_Assignment\_AB" and "Service\_Assignment\_D" tabs of the Depression Measure Codes List file.

For the Depression episode group, services performed in the following service categories are considered for assignment to the episode:

- Outpatient (OP) Facility and Clinician Services
- Emergency Department (ED)
- Inpatient (IP) – Medical

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<sup>20</sup> For a diagram illustrating an example of attribution to a TIN and TIN-NPI, please refer to Appendix B.

<sup>21</sup> The MACRA Patient Relationship Categories aim to distinguish the relationship and responsibility of a clinician with a patient at the time of furnishing an item or service, thereby facilitating the attribution of patients and episodes to one or more clinicians for purposes of measure score calculations. For more information on Patient Relationship Categories, please refer to the Patient Relationship Categories and codes operational list. (<https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Value-Based-Programs/MACRA-MIPS-and-APMs/CMS-Patient-Relationship-Categories-and-Codes.pdf>)

<sup>22</sup> The MACRA Patient Relationship Codes are HCPCS Level II modifier codes that clinicians report on claims to identify their patient relationship category. For the Patient Relationship Codes, please refer to Table 27 of the CY 2018 Physician Fee Schedule final rule. (<https://www.federalregister.gov/d/2017-23953/p-2203>)

<sup>23</sup> For more information on the Patient Relationship Categories and Codes, please download the Patient Relationship Categories and Codes FAQ. (<https://gpp-cm-prod-content.s3.amazonaws.com/uploads/236/Patient-Relationship-Categories-and-Codes-webinar-FAQ.pdf>)

- IP – Surgical
- Inpatient Rehabilitation Facility (IRF), Long Term Care Hospital (LTCH), SNF<sup>24</sup>
- Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DME)
- Home Health (HH)
- Part D drugs

In addition to service category, service assignment rules may be modified based on the service category in which the service is performed, as listed above. Service assignment rules can also be defined based on specific service information alone or service information combined with diagnosis information. Services may be assigned to the episode based on the following combinations:

- High level service code alone
- High level service code combined with first 3 digits of the ICD-10 diagnosis code
- High level service code combined with more specific service code
- High level service code combined with more specific service code and with 3-digit ICD-10 diagnosis code

The steps for assigning costs are as follows:

- **Identify** all services on claims with positive standardized payment that occur within the episode window.
- **Assign** identified services to the episode based on the types of service assignment rules described above.
- **Assign** all trigger and reaffirming Part B Physician/Supplier claims occurring during the episode window.
- **Assign** all SNF stays based on the following criteria:
  - Identify SNF stays where both (i) the SNF stay's qualifying IP stay is assigned to episode and (ii) the SNF stay occurs during the episode window.
  - For those identified SNF stays, determine the number of days that overlap with the episode window; if the overlap is greater than 30 days, cap claim amount assigned to the episode at 30 days.
- **Assign** all IRF and LTCH stays based on the following criteria:
  - Identify IRF and LTCH stays for which (i) there is a preceding IP stay discharged within 7 days prior to the stay's start date, (ii) the preceding IP stay is assigned to the episode, and (iii) the IRF and LTCH stays occur during the episode window.
  - For those identified IRF and LTCH stays, determine the distribution of grouped claim cost across episodes and cap claim amount assigned to the episode at the 90<sup>th</sup> percentile of each observed cost distribution.<sup>25</sup>
- **Assign** all inpatient evaluation and management (E/M) claims during IP stays assigned to episode.
- **Sum** the standardized Medicare allowed amounts for all claims assigned to each episode to obtain the total standardized episode observed cost.
- **Average** the total standardized episode observed cost over the number of days in the episode to get the episode average daily standardized observed cost.

<sup>24</sup> Services performed in the IRF, LTCH, and SNF settings are assigned to an episode based on their association with the grouped IP stay.

<sup>25</sup> Capping costs aims to limit the effects of extreme observed cost values on episode observed costs. Capping involves limiting the amount of claim costs that a provider can be assigned during an episode. For Major Depressive Disorder episodes with related LTCH and/or IRF costs, the value of the 90<sup>th</sup> percentile is assigned to all LTCH and IRF observed costs above the 90<sup>th</sup> percentile.

- **Multiply** the episode average daily standardized observed cost by 365 to get the episode scaled (annualized) standardized observed cost.

#### Service Assignment Example

- Clinician Group A has been providing continuous care management for Patient K's depression, and is attributed an episode with Patient K during the measurement period.
- Clinician Group A provides a psychotherapy visit for Patient K during the episode window. Because the psychotherapy visit is considered a clinically related service, its costs will be assigned to Clinician Group A's Depression episode with Patient K.

## 4.6 Exclude Episodes

Before measure calculation, episode exclusions are applied to remove certain episodes from measure score calculation. Certain exclusions are applied across all chronic condition episode groups, and other exclusions are specific to this measure, based on consideration of the clinical characteristics of a homogenous patient cohort. All measure-specific exclusions are listed in the "Exclusions" and "Exclusions\_Details" tabs in the Depression Measure Codes List file.

Episodes are excluded from the Depression measure if they meet any of the following cross-episode group conditions:

- The patient has a primary payer other than Medicare for any time overlapping the episode window or 120-day lookback period prior to the episode window.
- The patient was not enrolled in Medicare Parts A and B for the entirety of the 120-day lookback period plus episode window, or was enrolled in Part C for any part of the 120-day lookback period plus episode window.
- The patient is not found in the Medicare EDB.
- The patient has an episode window shorter than 1 year.
- The patient's death date occurred before the episode end date.
- The patient has extremely low treatment costs.
- The patient resided outside the United States or its territories during the episode window.

## 4.7 Estimate Scaled Expected Costs for Risk Adjustment

Risk adjustment is used to estimate episode expected costs in recognition of the different levels of care patients may require due to comorbidities, disability, age, specialty care, and other risk factors. The risk adjustment model includes variables from the CMS Hierarchical Condition Category Version 24 (CMS-HCC V24) 2021 Risk Adjustment Model,<sup>26</sup> as well as other standard risk adjusters (e.g., patient age) and variables for clinical factors that may be outside the attributed clinician's reasonable influence. A full list of risk adjustment variables can be found in the "RA" and the "RA\_Details" tabs of the Depression Measure Codes List file.

Steps for defining risk adjustment variables and estimating the risk adjustment model are as follows:

<sup>26</sup> CMS uses an HCC risk adjustment model to calculate risk scores. The HCC model ranks diagnoses into categories that represent conditions with similar cost patterns. Higher categories represent higher predicted healthcare costs, resulting in higher risk scores. The 86 HCC codes included in the CMS-HCC V24 model are mapped to thousands of ICD-10-CM diagnosis codes.

- **Define** HCC, number and types of clinician specialties from which the patient has received care,<sup>27</sup> and episode group-specific risk adjustors using service and diagnosis information found on the patient’s Medicare claims history in the 120-day default lookback period prior to the episode start date (or the timing specified in the “RA\_Details” tab of the Measure Codes List file) for certain billing codes that indicate the presence of a procedure, condition, or characteristic. For clinician specialty information, include information obtained on the episode start date.
  - **Create** the following categories to identify HCC frequency as a marker of patient comorbidity: 0, 1, 2-3, 4-6, and 7+ HCCs.
- **Define** other risk adjustors that rely upon Medicare beneficiary enrollment and assessment data as follows:
  - Identify beneficiaries who are originally “Disabled without ESRD” or “Disabled with ESRD” using the original reason for joining Medicare field in the Medicare beneficiary EDB.
  - Identify beneficiaries with ESRD if their enrollment indicates ESRD coverage, ESRD dialysis, or kidney transplant in the Medicare beneficiary EDB in the 120-day lookback period.
  - Identify beneficiaries who have spent at least 90 days in a long-term care institution (LTCI) without having been discharged to the community for 14 days, using LTC MDS assessment data. Then, identify the beneficiaries whose Depression episode start date overlaps with their stay in an LTCI.
  - Identify beneficiaries who have partial or full dual Medicare and Medicaid eligibility status as of the episode start date; adjust for dual eligibility status when risk-adjusted costs are on average higher for dually enrolled beneficiaries (i.e., drop risk adjustor when coefficient is less than 0).
- **Drop** risk adjustors that are defined for less than 15 episodes nationally for each sub-group and Part D enrollment status combination to avoid using very small samples.
- **Categorize** beneficiaries into age ranges using their date of birth information in the Medicare beneficiary EDB. If an age range has a cell count less than 15, collapse this in the next adjacent age range category towards the reference category (65-69).

The following steps are performed separately for each sub-group and Part D enrollment status combination:

- **Winsorize**<sup>28</sup> the episode scaled observed cost as follows:
  - **Assign** the value of the 98<sup>th</sup> percentile to all episode scaled observed costs above the 98<sup>th</sup> percentile.

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<sup>27</sup> Specialty groups include Allergy/Immunology, Anesthesiology, Behavioral Medicine, Cardiology, Chest Surgery, Chiropractor, Critical Care, Dentistry, Dermatology, Diagnostic Imaging, Emergency Medicine, Endocrinology, Facility, Gastroenterology, General Medicine/Family Practice, General Surgery and Surgical Oncology, Hospice and Palliative Care, Infectious Disease, Interventional Radiology, Nephrology, Neurology, Neurosurgery, NP/PA/Nurse Specialists.

<sup>28</sup> Winsorization aims to limit the effects of extreme values on expected costs. Winsorization is a statistical transformation that limits extreme values in data to reduce the effect of possible outliers. Winsorization of the lower end of the distribution (i.e., bottom coding) involves setting extremely low predicted values below a predetermined limit to be equal to that predetermined limit, and similarly for the higher end of the distribution involves setting extremely high predicted values above a predetermined limit to be equal to that predetermined limit.

- **Run** an ordinary least squares (OLS) regression model to estimate the relationship between all the risk adjustment variables and the dependent variable, the episode winsorized scaled observed cost calculated from the previous step, to obtain the episode scaled expected cost.
- **Winsorize** the episode scaled expected cost as follows:
  - **Assign** the value of the 0.5<sup>th</sup> percentile to all episode scaled expected costs below the 0.5<sup>th</sup> percentile.
  - **Renormalize**<sup>29</sup> values by multiplying each episode's winsorized scaled expected cost by the average scaled expected cost, and dividing the resultant value by the average winsorized scaled expected cost.
- **Exclude** episodes with outliers as follows:
  - **Calculate** each episode's residual as the difference between the re-normalized, winsorized scaled expected cost computed above and the winsorized scaled observed cost.
  - **Exclude** episodes with residuals below the 1<sup>st</sup> percentile or above the 99<sup>th</sup> percentile of the residual distribution.
  - **Renormalize** the resultant scaled expected cost values by multiplying each episode's winsorized scaled expected costs by the average winsorized scaled observed cost (after excluding outliers), and dividing by the average winsorized scaled expected cost (after excluding outliers).

## 4.8 Calculate Measure Score

Measure scores are calculated for a clinician or clinician group practice as follows:

- **Calculate** the ratio of winsorized scaled standardized observed cost to scaled expected episode cost for each episode attributed to the clinician or clinician group.
- **Calculate** the measure as a weighted average of these ratios across all of a clinician's or a clinician group's attributed episodes, where the weighting is the number of assigned days for a clinician or a clinician group during the episode.
- **Multiply** the weighted average episode cost ratio by the national average winsorized scaled observed episode cost to generate a dollar figure for the cost measure score.

The clinician-level (or clinician group practice-level) risk-adjusted and specialty-adjusted cost for any attributed clinician (or clinician group practice) "j" can be represented mathematically as:

$$Measure\ Score_j = \left[ \frac{1}{n_j} \sum_{i \in \{I_j\}} \left( \frac{Y_{ij}}{\hat{Y}_{ij}} \times n_{ij} \right) \right] * \left( \frac{1}{N} \sum_{i \in \{I\}} Y_i \right)$$

<sup>29</sup> Renormalization is performed after adjustments are made to the episode's expected cost, such as winsorization or residual outlier exclusion. This process multiplies the adjusted values by a scalar ratio to ensure that the resulting average is equal to the average of the original value.

where:

$Y_{ij}$	is the winsorized <b>scaled</b> observed payment for episode $i$ and attributed clinician (or clinician group practice) $j$
$\hat{Y}_{ij}$	is the <b>scaled</b> expected payment for episode $i$ and attributed clinician (or clinician group practice) $j$
$n_{ij}$	is the number of assigned days for episode $i$ and attributed clinician group practice $j$
$n_j$	is the total number of days assigned to attributed clinician (or clinician group practice) $j$ across all episodes (summation of $n_{ij}$ )
$N$	is the total number of episodes attributed to clinicians (or clinician group practices) nationally
$Y_i$	is the winsorized <b>scaled</b> observed payment for episode $i$
$i \in \{I_j\}$	is all episodes attributed to clinician (or clinician group practice) $j$
$i \in \{I\}$	is all episodes attributed to clinicians (or clinician group practices) nationally

A diagram demonstrating a visual depiction of an example measure calculation can be found in Appendix C.

**A lower measure** score indicates that the observed episode costs are lower than or similar to expected costs for the care for the particular patients and episodes included in the calculation.

**A higher measure** score indicates that the observed episode costs are higher than expected for the care provided for the particular patients and episodes included in the calculation.

# Appendix A. Example Illustrations of Scenarios for Episode Construction and Assignment of Days

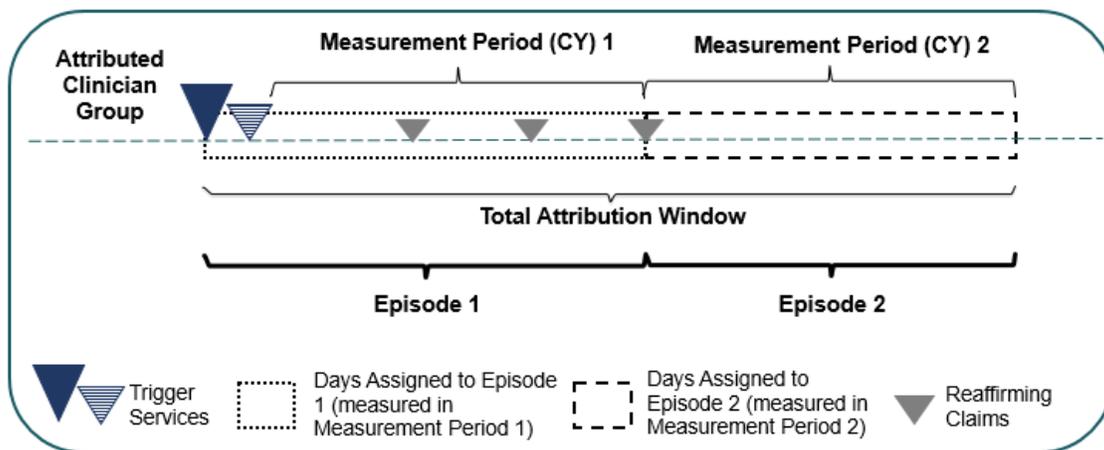
This appendix provides additional details on how an episode is constructed and attributed to a particular measurement period, and how days are assigned to an episode.

## A.1. Simple Example of Defining an Episode

In Figure A-1 below:

- Episode 1 is a portion of the total attribution window that starts on the day of the trigger claim and concludes at the end of the subsequent measurement period (December 31). Since episode 1 ends in measurement period 1, the associated costs will be measured in measurement period 1.
- Episode 2 is a one-year long portion of the total attribution window that starts at the beginning of measurement period 2 (January 1) and ends at the end of the measurement period (December 31). Since episode 2 ends in measurement period 2, the associated costs will be measured in measurement period 2.

Figure A-1. Episode Windows



## A.2. Episode Construction Examples

The figures below provide examples of how episodes are constructed and attributed to a particular measurement period. Overall, an episode's window is defined based on:

- whether the patient-clinician relationship during the measurement period was continuous, and
- the amount of claims data that has not been assessed in preceding measurement periods.

These examples also show how days are assigned to episodes. In each of these examples, we focus on episodes assessed in measurement period 2, which are used in Appendix C to demonstrate how the measure score is calculated in a given measurement period. Assigned days are used as a weighting factor at the measure score calculation step, where the observed to expected ratio of each episode is weighted by the number of assigned days to that episode and then averaged over all episodes attributed to the clinician or clinician group. Therefore, to

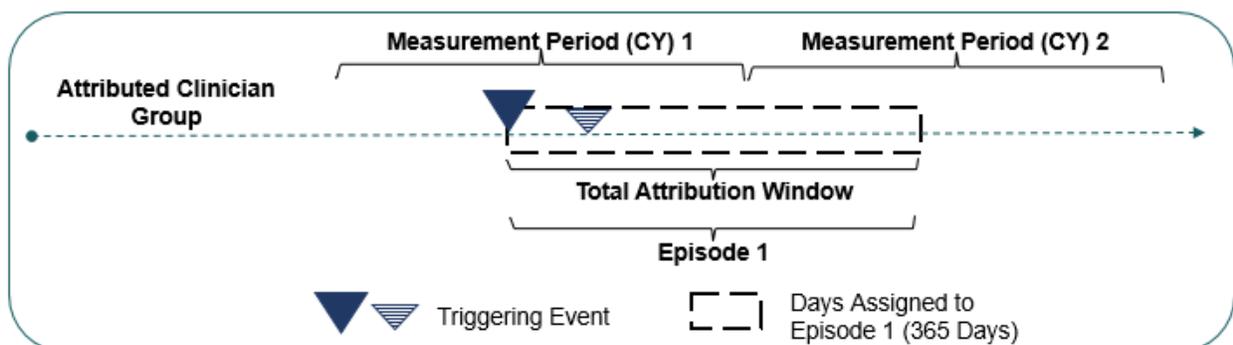
ensure fair comparison, longer episodes are given more weight during measure calculation than shorter episodes.

### Episode Window 1. 365 Days; No Reaffirming Claims During the Total Attribution Window

Figure A-2 illustrates a Depression episode that is 365 days long. This episode begins during the first measurement period with a pair of triggering services that opens a one-year long attribution window that extends into the second measurement period. While a reaffirming service would have extended the relationship between the patient and the attributed clinician, the absence of a reaffirming claim ends this clinician-patient relationship after 365 days. Therefore, in this example, the length of the total attribution window and the episode are the same.

- **Measurement Period 1:** Costs will not be assessed during measurement period 1 because there was not a year's worth of claims data to assess during this measurement period.
- **Measurement Period 2:** Costs will be assessed during measurement period 2 because the episode ended in measurement period 2 and contained a year's worth of claims data that have not been previously assessed.
  - Since none of the days were previously assessed, all 365 days would be assigned to episode 1 and would be used as a weighting factor at the measure score calculation step.

**Figure A-2. Episode Window (365 Days; No Reaffirming Claims)**



### Episode Window 2. 366 to 729 days; Reaffirming Claims During the Total Attribution Window

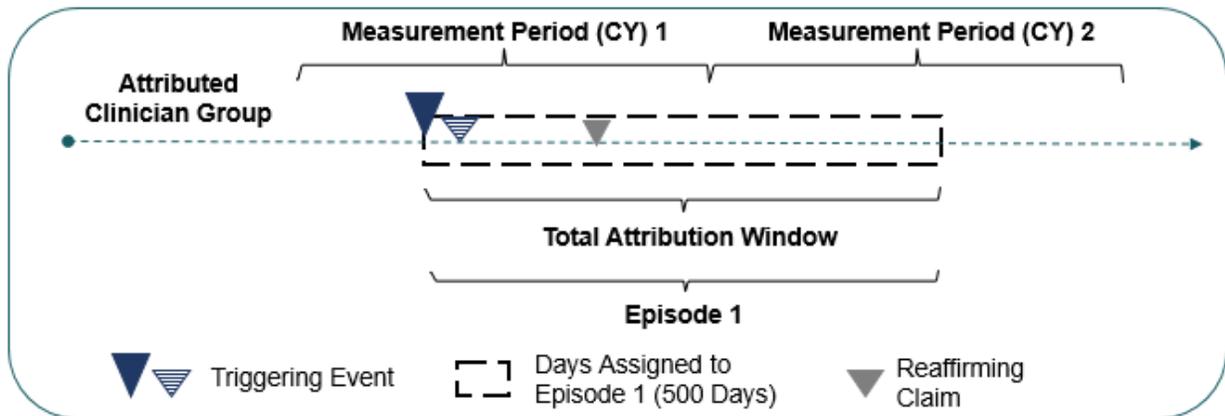
Figure A-3 illustrates a Depression episode that is longer than 365 days.<sup>30</sup> This episode begins during measurement period 1, contains 1 reaffirming claim 135 days into the attribution window that extends the initial attribution window by another 365 days, and ends 500 days after the trigger claim during measurement period 2.

- **Measurement Period 1:** Costs will not be assessed during measurement period 1 because of the absence of a year's worth of claims data to assess during this measurement period.
- **Measurement Period 2:** Costs will be assessed during measurement period 2 because the episode ended in measurement period 2 and contained a year's worth of claims data that have not been previously assessed.

<sup>30</sup> Episodes can be up to 729 days long. At 730 days, the patient's episode would be split into 2 distinct 365-day long episodes because there would be a year's worth of claims data available in each episode.

- Since none of the days were previously assessed, all 500 days would be assigned to episode 1 and would be used as a weighting factor at the measure score calculation step.

**Figure A-3. Episode Window (366 to 729 Days; Reaffirming Claims)**



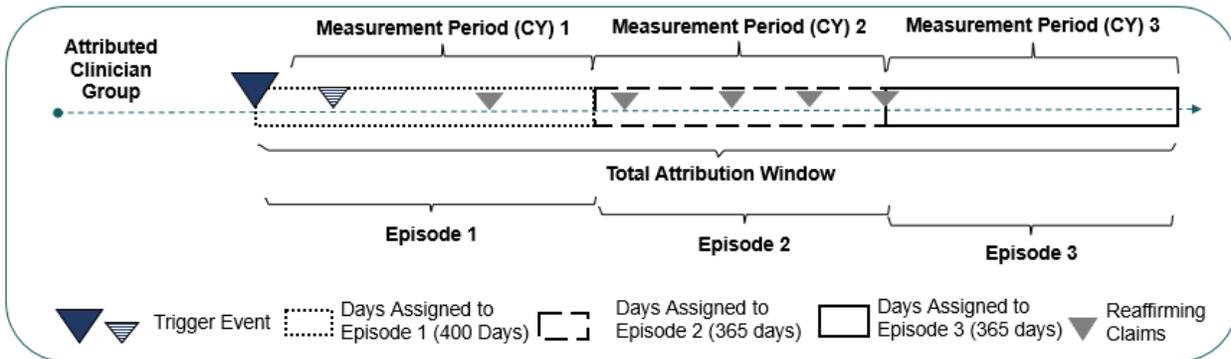
### **Episode Window 3. 365 days; Multi-Year Total Attribution Window**

Figure A-4 illustrates a long total attribution window that is at least two years in length with a Depression episode that is 365 days long, where sufficient claims data was assessed in the preceding measurement period.

The total attribution window begins with a pair of trigger services billed 35 days before measurement period 1, and ends approximately 38 months later, when the clinician-patient relationship ends during measurement period 3.

- **Measurement Period 1:** Episode 1 started on the day of the trigger claim and ended at the end of measurement period 1 (on December 31).
  - Costs will be assessed during measurement period 1 because episode 1 ended in measurement period 1 and contained at least a year's worth of claims data that have not been previously assessed. Since none of the days were previously assessed, all 400 days would be assigned to episode 1.
- **Measurement Period 2:** Episode 2 started on January 1 of measurement period 2 and ended on December 31 of measurement period 2.
  - Costs will be assessed during measurement period 2 because the episode ended in measurement period 2 and contained a year's worth of claims data that have not been previously assessed. Since none of the days were previously assessed, all 365 days would be assigned to episode 2.
- **Measurement Period 3:** Episode 3 started on January 1 of measurement period 3 and ended on December 31 of measurement period 3.
  - Costs will be assessed during measurement period 3 because the episode ended in measurement period 3 and contained a year's worth of claims data that have not been previously assessed. Since none of the days were previously assessed, all 365 days would be assigned to episode 3.

**Figure A-4. Episode Window (365 days; Multi-Year Total Attribution Window)**



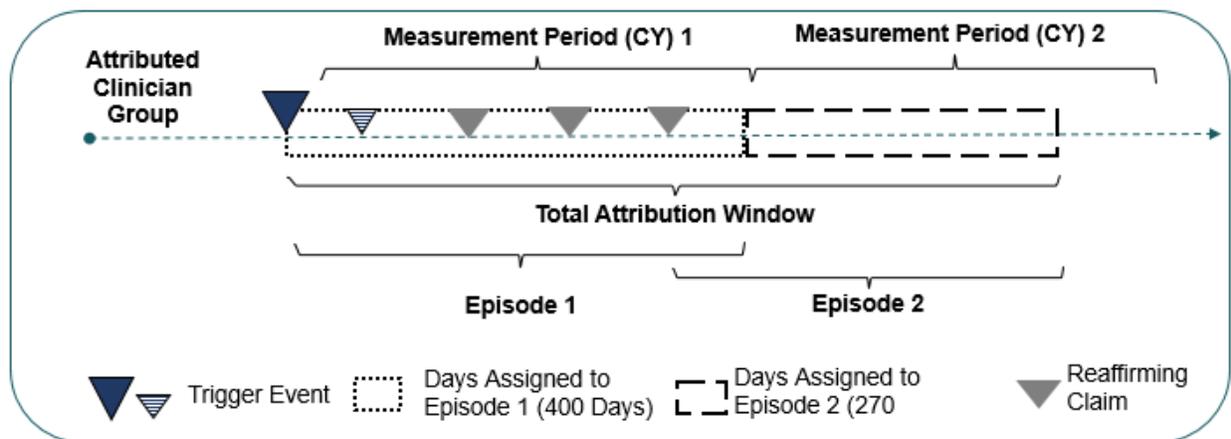
**Episode Window 4. 365 Days; Overlapping Episodes**

Figure A-5 depicts how the remaining days of long total attribution windows are assessed when there are less than 365 days of claims data that has not been previously assessed.

In this example, the total attribution window begins with a pair of trigger services billed approximately 35 days before measurement period 1 and ends 670 days (approximately 22 months) later, when the clinician-patient relationship ends during measurement period 2.

- **Measurement Period 1:** For episode 1, costs will be assessed during measurement period 1 because episode 1 ended in measurement period 1 and contained at least a year’s worth of claims data that have not been previously assessed. Since none of the days were previously assessed, all 400 days would be assigned to episode 1.
- **Measurement Period 2:** For episode 2, there is not a year’s worth of claims data between the end of episode 1 and the end of the total attribution window. Therefore, the start date of episode 2 is set as 365 days prior to the end of the total attribution window, and falls during episode 1.
  - Since the costs during the days where episodes 1 and 2 overlap have already been assessed during measurement period 1, only the days occurring **after** the episode 1 end date will be assigned to episode 2 (270 days). These 270 days will be used as a weighting factor at the measure score calculation step.

**Figure A-5. Episode Window (365 Days; Overlapping Episodes)**



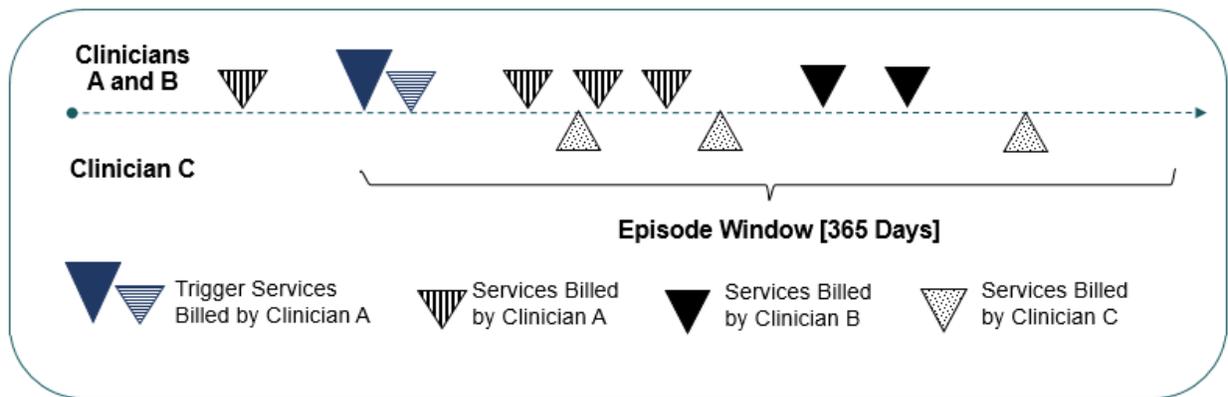
## Appendix B. Illustration of Attribution to Individual Clinicians (TIN-NPI)

This appendix provides a detailed illustration of the attribution methodology at the TIN and TIN-NPI levels. Once a Depression episode has been defined, it is attributed to the:

- TIN that billed the trigger services (trigger claim and confirming claim) for the total attribution window, and to the
- TIN-NPI(s) within the attributed TIN that billed at least 30% of trigger or confirming codes on Part B Physician/Supplier claim lines during the episode.

The measure's attribution methodology also imposes additional checks to ensure that TINs and TIN-NPIs are appropriately attributed. Specifically, TIN-NPIs that meet the 30% threshold must have billed at least one trigger or confirming code within 1 year prior to or on the episode start date.

Figure B-1. TIN-NPI Attribution



\*\* Only services that occurred during the episode window are used to determine whether the clinician met the 30% threshold

Figure B-1 illustrates a scenario in which 3 clinicians (A, B, and C) within an attributed clinician group (TIN 1) have billed services during a patient's episode window. Within the episode window, there are a total of 10 services billed across the 3 clinicians. Each of these services is uniquely marked depending on the clinician that billed the service.

**For TIN level attribution,** TIN 1 is attributed the episode because it billed the trigger services for the patient. **For TIN-NPI level attribution,** Clinician A bills 5 qualifying services (5/10, 50%), Clinician B bills 2 services (2/10, 20%), and Clinician C bills 3 services (3/10, 30%) during the episode window. Clinicians A and C met the 30% threshold, so they are considered for attribution. Clinician B did not meet the 30% threshold, so it is not considered for attribution.

- Check: Clinician A billed at least one trigger or confirming code within 1 year prior to or on the episode start date, so it is considered for attribution. Clinician C did not bill any such services, so Clinician C is not considered for attribution.

Since only Clinician A met the 30% threshold and the additional check, it is attributed this episode.

## Appendix C. Measure Calculation Example

This sub-section shows how the measure score is calculated. Figure C-1 below provides an illustrated example of measure calculation, using an example measure where the clinician group has only 4 attributed episodes for demonstration purposes.

Figure C-1. Chronic Condition Episode-Based Cost Measure Calculation Steps

