

Performance Year 2018 Promoting Interoperability Performance Category Score for MIPS APM Participants

This fact sheet provides an overview and sample of the Promoting Interoperability (PI) performance category score calculation for MIPS eligible clinicians in the Merit-based Incentive Payment System (MIPS) Alternative Payment Models (APMs). MIPS eligible clinicians in [MIPS APMs](#) receive special scoring under the APM Scoring Standard. The calculated PI performance category score is generated from all scores of MIPS eligible clinicians participating in the APM Entity.

APM Scoring Standard

MIPS APMs hold their eligible clinicians accountable for the cost and quality of care provided to Medicare beneficiaries. To understand their MIPS participation, all eligible clinicians should [check their participation status](#).

The APM Scoring Standard accounts for activities already required by the APM to reduce duplication of reporting and allow clinicians to focus on the goals of the APM. MIPS eligible clinicians in a MIPS APM participate in MIPS through their APM Entity and are scored under the APM scoring standard.

You can learn more about the APM scoring standard in our [resource library](#).

Promoting Interoperability

The Promoting Interoperability performance period is a minimum of any continuous 90-day period within the calendar year.

Each MIPS eligible clinician in an APM Entity receives the same Promoting Interoperability performance category score, under the APM Scoring Standard. The Promoting Interoperability performance category score is an average of the highest score attributed to each MIPS eligible clinician in the APM Entity based on their individual or group reporting. We designed scoring this way intentionally to encourage you to focus on measures that are most applicable to how you deliver care to patients instead of on measures that may not be as applicable to you. Our goal is to provide increased flexibility to you and enable you to focus more on patient care and health data exchange through interoperability.





We score each measure according to the scoring methodology established in rulemaking for the Promoting Interoperability performance category. The measure performance rate calculated is based on the numerator and denominator submitted, except for the Public Health and Clinical Data Registry Reporting objective's measures as well as the Security Risk Analysis measure, which require "yes or no" submission. Each measure contributes to the clinician's total Promoting Interoperability performance category score.

Eligibility Rules

APM Entities that are in MIPS APMs receive a PI performance category score that accounts for all MIPS eligible clinicians in the APM Entity. However, APM entity groups below the Low Volume Threshold are excluded from MIPS and do not receive an APM Entity level PI performance category score. When downloading the Promoting Interoperability .CSV file if the "Exempt" column is populated with "True", that provider and their scores listed in the row did not contribute to the APM Entity Base Score.

Promoting Interoperability APM Entity Scoring Rules

APM Entities' scores are averages of the MIPS eligible clinicians' scores in the APM Entity. If a MIPS eligible clinician qualifies for a significant hardship or other type of exception for the Promoting Interoperability performance category but chooses to submit data for the category as an individual or group, their data will be scored, and they will contribute to the rollup.

Participant TINs in Shared Savings Program ACOs receive a group score for all contributing eligible clinicians. Each group score is used to calculate the overall APM Entity (ACO) PI performance category score. Shared Savings Program participants that are solo practitioners can pick an NPI level submission if a TIN level submission does not exist.

If the MIPS eligible clinician is not in the Shared Savings Program, the clinician receives the best score between the group and individual submission, and that score is used to calculate the APM Entity PI performance category score.

PI Scoring Roll-Up Methodology for APM Entity Groups

1. We calculate the base scores of all MIPS eligible clinicians that are a part of the APM Entity.
2. We calculate the average of the MIPS eligible clinician base scores.
3. We assign the average of the MIPS eligible clinician scores as the **APM Entity Base Score**. This base score is inclusive of the PI Base Score and the PI performance score.
4. We add together all **Bonus Points** from the MIPS eligible clinicians in the APM Entity.
5. We assign the **total of Bonus Points** to the APM Entity, not to exceed 25 points in total.
6. The **APM Entity Base Score** is then added to the **total of Bonus Points** (not to exceed 25 points), which creates the **APM Entity Score** for the APM Entity.

APM Entity Group Scoring Methodology Example

Example APM Entity PI, Base, and Bonus Scores Including Exempt Status									
APM Entity	TIN	NPI	First Name	Last Name	PI Score	Base Score	Bonus	Exempt	Performance Year
Entity ID of APM	Taxpayer ID Number	National Provider ID	Clinician First Name	Clinician Last Name	PI Score for the APM and Each MIPS Eligible Clinician	All PI Measures that are not Bonus Measures	Based on additional earned bonus points	Excepted from PI Category or Not MIPS Eligible	2018
APM_101	1	1	John	Doe	100	100	10	FALSE	2018
APM_101	1	2	James	Johnson	100	90	5	FALSE	2018
APM_101	1	3	Jane	Smith	0	0	0	TRUE	2018
APM_101	2	4	Joane	Jones	100	0	0	FALSE	2018
APM_101	2	5	Sam	Williams	100	100	10	FALSE	2018
APM_101	2	6	John	Miller	100	75	0	FALSE	2018
APM_101	3	7	Lesley	Wilson	100	100	0	FALSE	2018
APM_101	3	8	John	Brown	100	75	0	FALSE	2018
APM_101	3	9	Mindy	Davis	0	0	0	TRUE	2018

Example APM Entity Promoting Interoperability Calculation		
Column	Score	Total
Base ¹	$\frac{100 + 90 + 0 + 100 + 75 + 100 + 75}{7}$	77.1428571
Bonus	10 + 5 + 10	25
PI Score	77.1428 + 25	100

¹ In the CSV download the “Base” column reflects MIPS eligible clinician’s Promoting Interoperability base score + their performance score

Base Score Measures

The base score measures are the promoting interoperability measures that MIPS eligible clinicians are required to report. The base score measures are separate from the bonus score measures.

STANDARD	
Measure ID	Reporting Category
PI_INFBLO_1	Pre-Attestation
PI_ONCDIR_1	Pre-Attestation
PI_ONCACB_1	Pre-Attestation
PI_EP_1	Base
PI_LVPP_1	Base
PI_PPHI_1	Base
PI_PEA_1 *	Base
PI_HIE_1	Base
PI_LVOTC_1	Base
PI_HIE_2 *	Base
PI_LVITC_1	Base
PI_PEA_2	Base
PI_CCTPE_2	Base
PI_CCTPE_1	Base
PI_HIE_3	Base
PI_CCTPE_3	Base
PI_PHCDRR_1	Base
PI_PHCDRR_2	Base
PI_PHCDRR_5	Base
PI_PHCDRR_4	Base
PI_PHCDRR_3	Base

TRANSITIONAL	
Measure ID	Reporting Category
PI_INFBLO_1	Pre-Attestation
PI_ONCDIR_1	Pre-Attestation
PI_ONCACB_1	Pre-Attestation
PI_TRANS_EP_1	Base
PI_TRANS_LVPP_1	Base
PI_TRANS_PPHI_1	Base
PI_TRANS_PEA_1	Base
PI_TRANS_HIE_1	Base
PI_TRANS_LVOTC_1	Base
PI_TRANS_PSE_1	Base
PI_TRANS_SM_1	Base
PI_TRANS_PEA_2	Base
PI_TRANS_MR_1	Base
PI_TRANS_PHCDRR_1	Base
PI_TRANS_PHCDRR_2	Base
PI_TRANS_PHCDRR_3	Base

Bonus Score

The bonus score measures are separate from the base score measures. As a reminder, the bonus score may not exceed 25 points in total.

1. 2015 CEHRT Bonus

- a. This new bonus applies to MIPS eligible clinicians who are only using 2015 Edition CEHRT.
 1. We validate all attestation statements and required base score measures.
 2. We also validate the submission does not contain measures from the Transition measure set.
- b. 10 points are awarded If both criteria have been met

2. IA CEHRT Bonus

- a. Reporting “yes” that you completed at least 1 of the specified Improvement Activities using certified EHR technology (CEHRT) and attest to having completed the qualifying activity in the Improvement Activities performance category.
- b. 10 Points are awarded if criteria have been met

3. PI Registry Bonus Measures

- a. If you report on one or more of the following Public Health and Clinical Data Registry Reporting Measures in addition to the one you reported for your performance score.
- b. 5 points are available for the submission of a second measure listed in the table below

Transition Measures **	Standard Measures**	Additional measures contributing to 5 points bonus ***
PI_TRANS_PHCDRR_1	PI_PHCDRR_1	PI_PHCDRR_1_MULTI
PI_TRANS_PHCDRR_2	PI_PHCDRR_2	PI_PHCDRR_2_MULTI
PI_TRANS_PHCDRR_3	PI_PHCDRR_3	PI_PHCDRR_3_MULTI
	PI_PHCDRR_4	PI_PHCDRR_4_MULTI
	PI_PHCDRR_5	PI_PHCDRR_5_MULTI

- c. *** Any of _MULTI measures can contribute 5 points to the Registry bonus only after one of PHCDRR (Registry) measures have been submitted.

- **Example: PI_PHCDRR_3 (Performance Score 10 points) + PI_PHCDRR_4_MULTI (5 points bonus)**

** First PHCDRR (Registry) measure will always contribute to Performance score/Base score for PI APM Entity Score.

Any additional PHCDRR measure will contribute to Registry Bonus (5 points).

- **Example: PI_PHCDRR_2 (Performance Score 10 points) + PI_PHCDRR_4 (5 points bonus)**

If you submit more than two Registry measures, we ignore third and following registry measures.

No more than 5 points are applicable inside Registry bonus.

- **Example: PI_PHCDRR_2 (Performance Score 10 points) + PI_PHCDRR_3 (5 points bonus) + PI_PHCDRR_4_MULTI (ignore)**

d. All of the above measures** also have a MULTI measure***, as data can be sent to multiple Registries that have the same category. Bonus points will be awarded after any of the measures above are submitted to fulfill the initial requirement of submitting to at least one Registry to be awarded bonus. Once the initial requirement has been awarded, 5 bonus points will be awarded for the second submission of a Registry measure.

e. **Important:** PI APM Entity Score Bonus consists of CEHRT bonus (PI_IACHERT_1) 10 points, CEHRT 2015 Bonus 10 points (No PI_TRANS* measures), and Registry Bonus - 5 points measures.

The bonuses are aggregated at the TIN level and added to the PI APM Entity score after the calculation with a cap of 25. With this addition, the PI APM Entity Score may not exceed 100 points.