

The Centers for Medicare & Medicaid Services (CMS) and its contractor, Acumen, LLC, will conduct field testing from February 1 to February 29, 2024, for 2 episode-based cost measures. The measures will undergo field testing before consideration of their potential use in the cost performance category of the Merit-based Incentive Payment System (MIPS).

These measures, which were developed with input from various specialty societies and other clinician groups, include Non-Pressure Ulcers that may be of significant interest to our members.

Field testing is an opportunity for clinicians and other interested members of the public to learn about episode-based cost measures and to provide <u>feedback via an online survey</u> on the draft measures. Conducting field testing helps developers to assess each measures' importance, scientific acceptability, and clinical validity. Feedback shared on these draft specifications will be used to consider potential measure refinements following field testing.

Clinicians and clinician groups with at least 20 episodes for at least one of the measures will receive a Field Test Report with information about their cost performance. This information will be for field testing purposes only.

# **Measures Undergoing Field Testing**

The following episode-based cost measures are being field-tested:

1. Movement Disorders: Parkinson's and Related Conditions, Multiple Sclerosis (MS), and Amyotrophic Lateral Sclerosis (ALS) (i.e., "Movement Disorders")

#### 2. Non-Pressure Ulcers

The measurement period for these Field Test Reports is January 1 to December 31, 2022. The draft measure specifications for each measure will be available on the <a href="Months:CMS.gov QPP Cost Measure Information pages">CMS.gov QPP Cost Measure Information pages</a> once field testing begins. Details about how to access the Field Test Reports are provided under "Accessing the Field Test Reports" below.

#### **How to Provide Feedback**

Anyone interested in the measures is invited to provide feedback—regardless of whether you receive a report. You can provide feedback on the draft measure specifications through this online survey once the field testing period begins. A document containing specific questions about the measures for reference while reviewing the materials will be available on the <a href="CMS.gov QPP Cost Measure">CMS.gov QPP Cost Measure</a> Information pages.

- The survey will open on February 1 and close at 11:59 PM ET on February 29, 2024.
- All survey questions will be optional. Participation is voluntary, and all feedback may be submitted anonymously.
- You may attach a comment letter (as a PDF or Word document) in addition to or as an alternative to responding to the survey questions.
- The link to the survey, which does not require a login, will also be included in the Field Test Reports and across other supplemental documentation so that you will be able to navigate easily to it from the documents you review.
- There will also be a <u>Person and Family Engagement (PFE) Field Testing Survey</u> available to gather input from people with lived experience with the conditions represented in the measures, as patients or caregivers.

## **Importance of Field Testing Feedback**

Feedback from clinical experts and other members of the public on cost measures is vital to the measure development process, and we hope you will consider sharing your input. Providing comments on the measures and their specifications during opportunities like field testing is especially impactful while the measures are still being developed and while the specifications can be refined based on consideration of your input.

Feedback received during prior field testing periods has been used to refine cost measures that have been finalized for use in MIPS; likewise, feedback received during this testing period will inform the final specifications of the 2 episode-based cost measures currently under development.

## **Field Testing Materials**

Field testing materials will be available on the <u>CMS.gov QPP Cost Measure</u> <u>Information pages</u> at the start of field testing, including:

- Specifications for the measures undergoing field testing
  - Draft Measure Methodology for each measure
  - Draft Measure Code Lists with codes and logic for each measure
- Informational field testing documents
  - Frequently Asked Questions (FAQ) document
  - Measure Development Process document
  - Measure Testing Form for each measure, which provides analytic results about the measures
  - Mock Field Test Reports
  - A Questions for Field Testing Measure Specifications document which contains a list of the survey questions for reference while reviewing materials
- Documents about accessing the Field Test Reports
  - Quality Payment Program Access User Guide (<u>click to download ZIP</u>)
    with guidance on how to create an account
  - Field Test Report User Access Guide with information on how to access the report on the Quality Payment Program website

#### **Cost Measures Field Testing Presentation**

CMS and Acumen will host a 2024 Cost Measures Field Testing presentation on February 14, 2024, from 1-2 PM ET. The link to register for this presentation will be shared in upcoming field testing outreach emails closer to the beginning of field testing. This presentation will provide:

- Information about the 2 episode-based cost measures undergoing field testing
- Project background, measure development process, and field testing activities
- Discussion of the content of the Field Test Report how to access and interpret these reports, and information on the supplemental documentation posted on the CMS.gov QPP Cost Measure Information pages

A recording of the presentation is also expected to be available for review after the presentation for interested parties unable to attend the session.

## **Accessing the Field Test Reports**

You or your group's authorized representative can access the Measure Field Test Report(s) at <a href="https://qpp.cms.gov/login">https://qpp.cms.gov/login</a> using a Quality Payment Program website account. If you don't have an account, you will need to register for a HCQIS Access Roles and Profile (HARP) account in order to sign in. Once you have access, you can connect with your organization by navigating to the "Manage Access" tab of the Quality Payment Program website. If you're part of a clinician group, you'll select the "practice" organization type, and if you're an individual clinician, you'll select the "individual clinician" organization type.

The Quality Payment Program Access User Guide (<u>download here</u>) provides more information on these account set-up processes.<sup>2</sup>

<u>Note</u>: Field Test Reports are separate from the Quality Payment Program Performance Feedback Reports, though both reports are made available through this website.

Groups are identified by their Medicare billing TIN. A group consists of two or more eligible clinicians, as identified by their NPIs that bill under the same TIN. A group will receive a Field Test Report if the TIN is attributed the minimum number of cases for a measure among all NPIs billing under the TIN. For a QPP account, a group can have either of the following roles:

- Security Official
- Staff User

Users who have a Security Official role will be able to see all TIN- NPI reports within their TIN, as well as the TIN's overall report, so it's a role that is more appropriate for someone who is in an administrative position at the TIN. Each organization must have a Security Official role before any other group members can request a Staff User role. The group-level users (i.e., Security Official and Staff Users) have access to the group practice's reports and the individual-level reports for the solo practitioners within the group practice.

An individual eligible clinician (or a solo practitioner) is identified by a single NPI that bills under the TIN. They'll receive a Field Test Report if the NPI is attributed the minimum number of cases for a measure. Clinicians looking to view only their TIN-

<sup>&</sup>lt;sup>1</sup> CMS, "QPP Account," Quality Payment Program, <a href="https://qpp.cms.gov/login?page=register">https://qpp.cms.gov/login?page=register</a>

<sup>&</sup>lt;sup>2</sup> CMS, "Quality Payment Program Access User Guide," Quality Payment Program, <a href="https://qpp-cm-prod-content.s3.amazonaws.com/uploads/335/QPP%20Access%20User%20Guide.zip">https://qpp-cm-prod-content.s3.amazonaws.com/uploads/335/QPP%20Access%20User%20Guide.zip</a>

NPI report should connect to the individual clinician organization type, regardless of whether they're a part of a group practice or they practice on their own.

The Field Test Report User Access Guide, available on the <u>CMS.gov QPP Cost</u> <u>Measure Information pages</u> at the start of field testing, provides more detailed information on accessing a Field Test Report.

#### **Project Background**

To learn more about the episode-based cost measure development process, please refer to the Measure Development Process document available on the <a href="CMS.gov QPP">CMS.gov QPP</a> Cost Measure Information pages at the start of field testing.

The Movement Disorders and Non-Pressure Ulcers measures represent Wave 6 of episode-based cost measure development. This process began in March 2023 and is scheduled to conclude in May 2024. After field testing, all workgroups will revisit and refine the measure specifications based on testing results and evaluation of the feedback received during field testing.

The workgroups providing input on these 2 measures undergoing field testing in 2024 represent a total of 34 members affiliated with 35 professional societies. Summaries from workgroup meetings held to-date can be found on the <a href="CMS.gov">CMS.gov</a> QPP Cost Measure Information "Current Work" page.