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Reporting PQRS—No EHR? No Problem: Use the IRIS Registry Web Portal

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Approximately 30% of ophthalmologists are expected to experience a 1.5% cut to this year's Medicare Part B payments because they failed to report PQRS in 2013. And since then, CMS has ratcheted up the penalties. If you fail to report PQRS this year, your 2017 Medicare payments will see a 2% PQRS cut *plus* a value-based payment cut of up to 2% (for smaller practices) or 4% (for practices with 10 or more eligible professionals, including optometrists).

So what's the good news? The IRIS Registry is making it easier to report PQRS. For practices with electronic health records (EHRs), the IRIS Registry can automatically extract the meaningful use program's clinical quality measures, and that can also count for PQRS if reported for the entire year. For practices without EHR, the IRIS Registry Web portal has also streamlined the reporting process. Furthermore, with the development of 19 measures for Qualified Clinical Data Registry (QCDR) reporting, the Web portal has made PQRS reporting possible for more subspecialties.



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Use the IRIS Registry to Report PQRS

No EHR? The IRIS Registry Web portal offers you 3 options for manually reporting PQRS. Use of the Web portal is free for U.S. Academy members and their staff.

Cataracts Measures Group reporting—deadline to sign up is Aug. 1.

- Report all 8 measures from the Cataracts Measures Group for 20 cataract cases (at least 11 must involve Medicare Part B patients; perform all 20 by Sept. 30).
- Provide patients with preop and postop surveys to fill out.

Qualified Registry reporting—deadline to sign up is Oct. 31.

- Report 9 measures from the PQRS measures list. (If you report fewer than 9 measures, you may be subject to a MAV review.)
- Include measures from 3 quality domains and at least 1 cross-cutting measure.
- Report each measure for at least 50% of the Medicare patients you see this calendar year for whom the measure applies.

QCDR reporting—deadline to sign up is Oct. 31.

- Report 9 measures from the PQRS measures list. (If fewer than 9 measures apply, report IRIS Registry QCDR measures, too).
- Include measures from 3 quality domains and at least 2 outcomes measures.
- Report each measure for at least 50% of all patients (including non-Medicare patients) you see this calendar year for whom the measure applies.

Deadlines for EHR-based and GPRO reporting have passed. If you have an EHR system, the easiest PQRS option is the automated extraction reporting mechanism—but the deadline for signing up was June 1. Similarly, if you wanted to use the IRIS Registry for the Group Practice Reporting Option (GPRO), the deadline to register with CMS for GPRO reporting has passed. (It was June 30.)

You still have time to report PQRS manually. You can report PQRS manually (no EHR required) via the

IRIS Registry Web portal. There are 3 options—Cataracts Measures Group reporting, Qualified Registry reporting, or QCDR reporting.

Use the Portal to Report the Cataracts Measures Group

If you perform enough cataract surgery, this option provides the most straightforward way to report PQRS without EHR. You will need to identify at least 20 cataract surgery cases, and at least 11 of those should involve Medicare Part B patients. Within the

IRIS Registry Web portal, you can generate (and provide patients with) preop visual function (VF) surveys, postop VF surveys, and postop satisfaction surveys. Perform the surgery, and manually report all 8 measures (up from 4 in 2014) in the Cataracts Measures Group for each of the 20 cases.

Tip. Move fast! Deadlines are fast approaching (see below).

Mistakes to avoid. In 2014, mistakes included: 1) reporting on fewer than 20 surgery cases, 2) reporting on fewer than 11 Medicare Part B patients, and 3) not enrolling patients early enough for them to fill out the VF survey before surgery.

Deadlines. By Aug. 1, submit signed agreements to the Academy. By Sept. 30, identify 20 surgical cases and perform surgery (schedule surgeries well in advance, so patients have plenty of opportunity to complete their preop surveys). By Dec. 1, submit consent for the Academy to send your PQRS data to CMS. By Jan. 15, 2016, submit all the necessary data to the IRIS Registry.

Use the Portal as a Qualified Registry to Report Individual Measures

Report 9 measures (up from 3 in 2014) from the PQRS list of measures. These should be drawn from at least 3 quality domains, and at least 1 should be a cross-cutting measure (see “Measure Domains and Types”). If you report fewer than 9 measures, CMS may perform the measure-applicability validation (MAV) process to ascertain whether you could have reported on additional measures. Similarly, a MAV review may be performed if you fail to report a cross-cutting measure.

Each measure should be reported for at least 50 percent of your Medicare Part B, Medicare as a secondary payer, and Railroad Medicare patients for whom the measure applies.

Note. If it looks as if you can't report 9 PQRS measures, you should consider using the QCDR reporting mechanism instead (see below).

Tips. Before obtaining the patients' demographic data from your billing system, check the IRIS Registry's requirements to make sure you are

Non-PQRS Measures for QCDR Reporting

Recognizing that physicians in some specialties could not find enough PQRS measures to satisfy the reporting requirements, CMS encouraged specialties to develop QCDRs that include specialty-specific measures. In 2014, the IRIS Registry was among the first QCDRs to secure CMS approval.

New measures for manual QCDR reporting. This year, the IRIS Registry includes non-PQRS measures. These 19 measures received CMS approval in April. They can be used for PQRS reporting only if you report manually via the Web portal. All of them are within the *effective clinical care* quality domain, and all but one are *outcome* measures (the exception, IRIS 9, is a *process* measure). For details of the 19 measures, go to www.aao.org/iris-registry/pqrs.

Developed with the help of 7 subspecialty societies. The Academy developed the QCDR measures in conjunction with the American Association for Pediatric Ophthalmology and Strabismus, the American Glaucoma Society, the American Society of Ophthalmic Plastic and Reconstructive Surgery, the American Uveitis Society, the Cornea Society, the Macula Society, and the Retina Society.

downloading data in an appropriate file format. Rather than reporting PQRS category II codes, physicians will use the Web portal to report one of the following: performance met, performance exclusion, or performance not met.

Mistake to avoid. In 2014, physicians sometimes entered a patient for a measure, but failed to check off the measure action (whether the measure was met, not met, or excluded).

Deadlines. By Oct. 31, submit signed agreements to the Academy. By Dec. 1, submit your signed consent allowing your data to be sent to CMS. By Jan. 15, 2016, enter all the necessary data into the IRIS Registry.

Use the Portal as a QCDR to Report Individual Measures

Report 9 measures from the PQRS list of measures. If fewer than 9 PQRS measures are applicable to your patients, you can make up the difference by reporting measures from the IRIS Registry's QCDR list of measures (see box). Your 9 measures must be drawn from at least 3 quality domains, and at least 2 should be outcomes measures.

Each of your 9 measures—whether from the PQRS list of measures or from the 19 IRIS Registry QCDR measures—should be reported for at least 50% of all patients (not just Medicare patients) for whom the measure applies.

Tips and deadlines. Same as the

tips and deadline schedule for Qualified Registry reporting (above).

Measure Domains and Types

Quality domains. PQRS measures and the 19 IRIS Registry QCDR measures are grouped into 6 quality domains: patient safety; person and caregiver-centered experience and outcomes; communication and care coordination; effective clinical care; community/population health; and efficiency and cost reduction.

Measure types. Each measure is assigned a type. For instance, some are categorized as cross-cutting measures and are meant to represent core competencies that apply to multiple specialties.

How to Get Started

First, decide which reporting option will work best for you. Go to www.aao.org/pqrs and select “Reporting Options” to see details about the 8 Cataracts Measures Group measures, the traditional PQRS measures, and the IRIS Registry QCDR measures.

You also can view “Quality Reporting In 2015,” a webcast that explains your PQRS options, at www.aao.org/practice-management/regulatory/pqrs-resources.

To sign up for the Web portal. Go to www.aao.org/irisregistry and select “Sign up,” then “IRIS Registry Application.” ■