

# TOP 3 Questions about the FOTO QCDR & MIPS

The FOTO Clinical Quality Data Registry (QCDR) will boost your MIPS reporting experience and is designed to make it easy.

## Question 1 - Am I required to report?

Click to Check

Among others, PTs and OTs will be *Eligible Clinicians* for MIPS starting in 2019. (Note: this does not include COTA's and PTA's.)

**Required participation:** Eligible Clinicians are required to participate in MIPS if they exceed all three of the following threshold criteria over a 12-month period:

1. Billed \$90K in Medicare Part B allowed charges for covered professional services
2. Provide care to 200 Part B-enrolled Medicare beneficiaries
3. Provided 200 covered professional services under the Physician Fee Schedule (PFS) to Medicare Part B beneficiaries

**Opt-in participation:** You may opt-in as an individual clinician or as a group if you exceed one or two of the three threshold criteria (either as a group or individual).

*Definitions:*

An **Individual Clinician** has his/her own TIN, thus will be signified to CMS and the registry as a single NPI/TIN combination.

A **Group** is defined as a single TIN that has individual clinicians who have assigned their billing rights to the TIN, thus will be signaled to CMS and the registry as a single TIN with multiple NPIs.

## What happens if I'm required but do not participate?

You will receive a final MIPS score of zero and a 7% penalty during the 2021 payment year.

## I'm not required to report, so why should I opt-in?

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Here are a few interesting reasons.

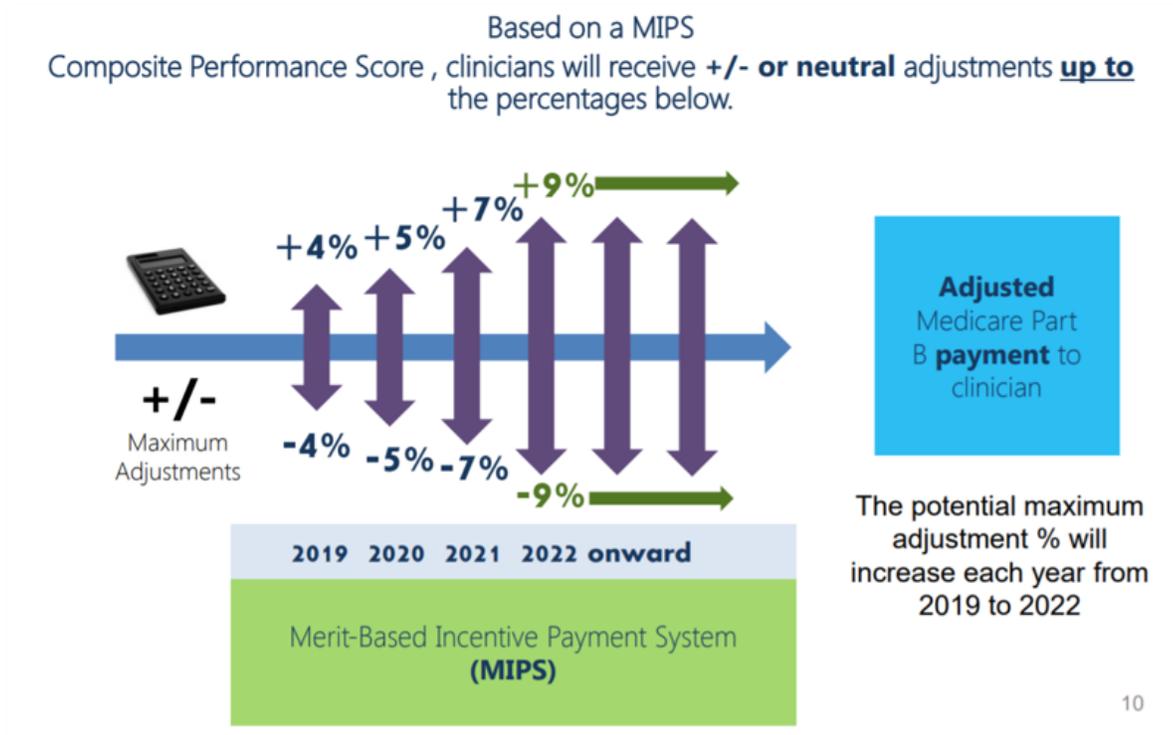
**Opportunity for up to a 7% reward** Though there is a risk of up to a 7% penalty. Consider taking a look at a recent 12-month snapshot of your Medicare B reimbursement and multiply that by 1%, 2%, etc. to help you discern whether to opt-in.

You may wish to factor in that while CMS must maintain budget neutrality, thus spreading penalty/reward dollars equally, CMS has additional funds to further reward providers for exceptional performance when providers exceed 75 MIPS points.

**Now is the time to get in.** 2019 offers a ramp-up period in that PT/OTs are required to submit for two performance categories (Quality and Improvement Activities) instead of all four during 2019.

**The +/- 7% reward/risk potential is expected to grow to +/- 9% in 2020.**

**If you don't feel ready to opt-in, consider Voluntary Reporting for 2019.** This means you get a trial run with CMS without taking on the 7% risk/reward. Voluntary reporting allows you to learn your level of readiness and gain experience with the goal of entering as a MIPS participant in 2020.



Here are a few tools from CMS to help further explain MIPS

[Quickstart Guide](#)

[Scoring Guide](#)

[How to Submit](#)

Need more detail - visit the [CMS Website](#)

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## Question 2 - What Quality Measures and Improvement Activities will the FOTO QCDR Provide?

FOTO offers the most extensive list of MIPS Clinical Quality Measures (CQMs) for reporting (18), including 7 exclusive NQF endorsed measures, plus a new QCDR Quality Outcome Measure, and Improvement Activities. Don't risk only reporting the minimum; we make it easy.

**The number of Quality measures available through FOTO's QCDR offers you an advantage.**

- You must submit at least six quality measures. CMS will choose your top six scores, so it's ideal to submit more than six.
- Easy access to the seven MIPS CQMs and one QCDR measure\*; the time-consuming process to hand administer and complete the complex scoring is done for you.
- Plus, 6 quality process measures, pending CMS' release of final measure specifications, anticipated on or about December 15.

### **Quality Measures:**

Outcome Measures	Process Measures
217 FS: Knee Impairments	128 BMI
218 FS: Hip Impairments	130 Current Medications
219 FS: Lower leg/Foot/Ankle Impairments	131 Pain Assessment
220 FS: Lumbar Impairments	154 Fall Risk Assessment
221 FS: Shoulder Impairments	155 Fall Plan of Care
222 FS: Elbow/Wrist/Hand Impairments	182 Functional Outcome Assessment
223 FS: Cranium/Mandible/Thoracic/Ribs	127 Diabetic Foot Care (PT)
xxx FS: Neck Impairments (QCDR measure)	134 Depression screening (OT)
	181 Elder Maltreatment (OT)
	226 Tobacco (ages 18 and older) (OT)
	402 Tobacco (ages 12-20) (OT)

**Improvement Activities:**

The Improvement Activities Performance Category is a new concept introduced by MIPS reporting and rewards eligible clinicians for participating in activities related to their patient population. Clinicians and groups can choose to participate in activities most relevant to both their practice and patient population

What is this and why is it important?

- For PT and OT during 2019, there are 2 MIPS categories: Quality Measures and Improvement Activities (IA's)
- The IA category comprises 15% of a provider's Total MIPS Score
- CMS's purpose for the IA category promotes providers' participation in activities that improve clinical practice, such as
  - Use of patient-reported outcome measures
  - Engaging patients in their patient-reported outcome measure results to enhance communication between provider and patient
  - Use of a QCDR for quality improvement using comparative analysis reports across patient populations
  - Sharing a pre-visit agenda with the patient to promote patient engagement

Providers who use the FOTO Outcomes Management System already meet, or come close to meeting, the requirements for enough IA's to allow you to obtain the maximum number of MIPS points. Thanks to this, the additional work required to fulfill your IA requirement is minimal.

- BE\_6 Collection and follow-up on patient experience and satisfaction data (**HIGH**)
- BE\_7 Participation in a QCDR, that promotes use of patient engagement tools
- BE\_13 Regularly assess the patient experience of care through surveys
- BE\_22 Improved practices that engage patients pre-visit
- AHE\_3 Promote use of Patient-Reported Outcome Tools (**HIGH**)
- PM\_10 Use of QCDR data for quality improvement such as comparative analysis reports



## FOTO Offers have 3 options for using FOTO as a Registry

Option #	Option Name	Description	Cost
<b>Option 1</b>	EMR Integration Reporting for Quality & IAs	Integration with your EMR. See EHR for status of integration. FOTO Registry-API endpoint is available for any EMR to utilize.  *Best option	\$300 per clinician per reporting period
<b>Option 2</b>	Standardized File Submission Reporting for Quality & IAs	If your EMR is not ready to connect to the FOTO QCDR for 2019, FOTO can provide a FOTO standardized file format for electronic submission of data to FOTO	\$300 per clinician per reporting period
<b>Option 3</b>	Limited Measure Reporting - Quality & IAs	FOTO Outcomes Manager users can report on Quality Measures and IAs. No process measures included.	\$300 per clinician per reporting period

\*A FOTO Outcomes Manager or OM Lite subscription is required for a FOTO QCDR subscription. [Read option descriptions.](#)

## Question 3 - Why use the FOTO QCDR?

CMS is grading on a curve (i.e., the budget neutrality requirement), which means you want every advantage toward earning maximum points. Using the FOTO QCDR helps you stack the deck in your favor, giving you important advantages over other modes of reporting and other registries.

**It's fully automated so you save time. Ensure compliance in the most efficient and complete way possible.**

- The FOTO QCDR's fully automated nature is achieved by seamless electronic integrations with 3 systems:
  - your EMR,
  - the FOTO Outcomes Management System, and
  - the CMS Quality Payment Program (QPP) Submission API
- Talk to your EMR and make sure they plan to connect to the FOTO QCDR.
- As a subscriber to the FOTO Outcomes Management System, your quality outcome measures are already in hand. FOTO subscribers track the Quality outcome measures so it's a "gimme" for you. No need to do extra documentation work!

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- Quality process measures will be sent to the FOTO QCDR from your EMR so you're eliminating double entry. Options available if EMR is not yet integrated, see below.
- Improvement Activities are another “gimme” for FOTO subscribers. By using the FOTO Outcomes Management System and the FOTO QCDR, you have already met most (or all, depending on which activities you select) of the requirements to achieve your full quota of Improvement Activities points.
- You can attest to Improvement Activities via the FOTO QCDR’s user-friendly interface.
- FOTO provides easy-to-use templates to speed through your validation of Improvement Activities.
- You can stay on top of your results throughout the year by viewing a frequently updated dashboard. Because the FOTO QCDR is connected to CMS’ QPP Submission API, data is transferred directly and frequently to CMS. CMS then sends feedback about your performance directly back to the FOTO QCDR so that we can provide you dashboard feedback. This helps to reduce errors because providers receive more frequent feedback and have the ability to routinely review their submission data (i.e. make crucial catches).

### **FOTO is the most experienced registry for PT/OTs. (since 2008)**

**FOTO is a Measure Developer in addition to a registry.** We have extensive experience and success in the scientific development and submission of quality measures.

**FOTO serves more rehab therapy provider types (occupational therapy and physical therapy).** Other specialty registries may only serve one type.

### **FOTO Clients - Outcomes Manager and OMLite**

No need to upgrade, both levels can use the registry

### **Benefits of using the FOTO QCDR**

1. Minimize staff and patient burden. A fully automated system to save you time. User-friendly dashboard to monitor reporting and reduce errors.
2. Enjoy “One-stop shopping” because FOTO provides both MIPS categories required for PT/OT reporting during 2019—Quality measures and Improvement Activities.
3. FOTO has the most experienced specialized rehab therapy registry (since 2008) serving both PT and OT.

Have more questions?

[Visit our Question and Answer bank](#)

**Ready to purchase? Email us!**