

2023 MIPS IMPROVEMENT ACTIVITY PERFORMANCE CATEGORY: HELPFUL INFORMATION

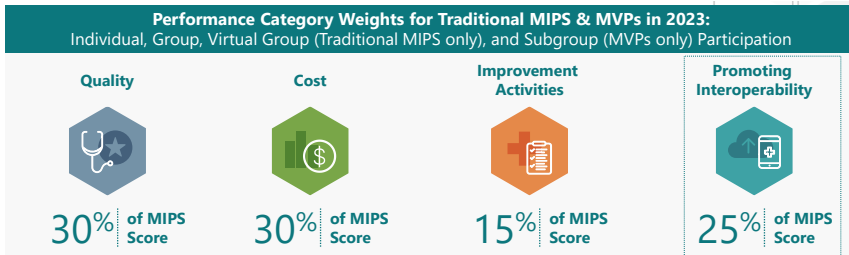
Please note the MIPS Improvement Activity (IA) Performance Category reporting requirements for MIPS-eligible clinicians and groups for the 2023 reporting year are available in the CMS Quality Payment Program Resource Library.

The minimum required period for full credit in the IA category for 2023 is 90 days*, so there is still time!

MIPS Improvement Activity Performance Category

For 2023, the improvement activities performance category for traditional MIPS:

- Is generally worth 15% of your MIPS final score.
- Requires you to implement 2 to 4 improvement activities to receive the maximum score of 40 points in this performance category.
- Has a performance period of 90 continuous days for most improvement activities with a few exceptions.
- Requires you to attest to activities during the submission window (1/2/2024 – 4/1/2024) for the 2023 performance year.
- At least 50% of the clinicians (in the group or virtual group) must perform the same activity within the same performance period.



IA Scoring

Your IA score is determined by the number of points earned divided by the maximum number of points (40). The IA score is then weighted by 15% when calculating your final MIPS score. The number of required activities depends on whether the clinicians have certain special statuses. CMS does not limit the number of high or medium weighted activities you may submit, though you can only be awarded a maximum of 40 total points.

How to Report IAs

There are several submission mechanisms available for Improvement Activities during the 2023 performance period, including Attestation, Qualified Clinical Data Registry (QCDR)*, Qualified Registry, Electronic Health Record (EHR), and CMS Web Interface (groups or virtual groups of 25 or more).

For most MIPS eligible clinicians, groups, virtual groups, and APM Entities:



Each medium-weighted activity is worth **10 points**



Each high-weighted activity is worth **20 points**

For MIPS eligible clinicians, groups, virtual groups, and APM Entities with certain special status designations (small practice, non-patient facing, rural, or Health Professional Shortage Area (HPSA)):



Each medium-weighted activity is worth **20 points**



Each high-weighted activity is worth **40 points**

Patient facing clinicians are required to attest to either *two high-weighted Improvement Activities or four medium-weighted activities*

Non-patient facing clinicians, groups of fewer than 15 participants and those in rural or health professional shortage areas only have to attest to *one high-weighted activity or two medium-weighted activities.*

Available Activities

OEIS National Registry offers participating physicians and groups a list of [OEIS NR Recommended Improvement Activities](#). The full list of all [CMS-approved Quality Payment Program Improvement Activities](#) is available in the [QPP Resource Library](#).

New Improvement Activities	4 Added	Modified Improvement Activities	5 Modified	Removed Improvement Activities	6 Removed
1. Adopt Certified Health Information Technology for Security Tags for Electronic Health Record Data (IA_AHE_10)		1. Practice Improvements to Align with OpenNotes Principles (IA_CC_13)		1. Participation in a QCDR, that promotes use of patient engagement tools (IA_BE_7)	
2. Create and Implement a Plan to Improve Care for Lesbian, Gay, Bisexual, Transgender, and Queer Patients (IA_AHE_11)		2. Practice Improvements that Engage Community Resources to Address Drivers of Health (IA_AHE_12)		2. Participation in a QCDR, that promotes collaborative learning network opportunities that are interactive (IA_BE_8)	
3. Create and Implement a Language Access Plan (IA_EPA_6)		3. Use of QCDR data for ongoing practice assessment and improvements (IA_PSPA_7)		3. Use of QCDR for feedback reports that incorporate population health (IA_PM_7)	
4. COVID-19 Vaccine Achievement for Practice Staff (IA_ERP_6)		4. Obtain or Renew an Approved Waiver for Provision of Buprenorphine as Medication-Assisted Treatment for Opioid Use Disorder (IA_BMH_13)		4. Consultation of the Prescription Drug Monitoring program (IA_PSPA_6)	
		5. Implementation of formal quality improvement methods, practice changes, or other practice improvement processes (IA_PSPA_19)		5. Leadership engagement in regular guidance and demonstrated commitment for implementing practice improvement changes (IA_PSPA_20)	
				6. PCI Bleeding Campaign (IA_PSPA_30)	

Attesting and Submitting Activities

For MIPS reporting, only an attestation is required to receive points for completing Improvement Activities. Participants in the OEIS National Registry QCDR can submit IA attestations using a webform that will be available to MIPS participating sites and physicians during the submission election period at the beginning of the year. One attestation must be provided for each Improvement Activity performed for a minimum 90 day period within the performance year.* Those who choose to submit using Claims or Qualified Registries can attest to Improvement Activities using a web interface soon to be available on the CMS website.

Be Prepared for CMS Audit

CMS has provided some suggested documentation for each activity, for practices to use to document their IA reporting, but their guidelines are not specific. In the event of an audit, practices will need to ensure they have documentation confirming the completion of the activity.*

According to CMS, "The documentation used to validate your activities should demonstrate consistent and meaningful engagement within the period for which you attest."

*CMS currently requires maintaining records supporting MIPS performance for six (6) years following the end of the performance year. For more information, please see the CMS [2023 MIPS Data Validation Criteria](#).

Suggested Documentation

OEIS NR recommends gathering your supporting documentation at the time of initial collection, reporting, and storage of data so you will be prepared in the event of an audit. Once the practice has decided which activities to report, the following steps should be followed to create the audit documentation for *each activity*:

1. **List the Improvement Activity Selected**
 - Include IA number and Activity Name from the IA List published in the CMS [QPP Resource Library](#).
 - List the activity weight (either high or medium)
2. **List the timeframe for performing the activity**
 - Minimum 90 consecutive days in 2023 (ex. September 1, 2023-December 31, 2023)
3. **Describe how your practice plans to satisfy this activity**
 - Give a title and personalize the activity with a description including any goals and targeted outcomes or metrics
4. **Describe the current process to be improved**
 - Include people, process, technology
 - If no process currently exists, describe the lack of process that will be addressed with your improvement activity
5. **Detail the steps to implement your activity including your process and workflows**
 - Include people, process, technology, metrics, etc.
 - Ex.) For IA_PM_7 Use of QCDR data for ongoing practice assessment and improvements, documenting that physicians (at least 50% of physicians in the group for a group submission) are regularly reviewing and utilizing OEIS NR QCDR reports for practice assessment and to identify areas for improvement (e.g., Emergent Transfer report allows for reviewing care trends to improve patient safety; Procedure Success and Complication reports allows assessment of best practices to improve patient care) over the course of a 90 day (minimum) period. Describe the benefits and value derived by the activity and who will benefit (patients, hospital, your practice, referring physicians, etc.)*
 - Include benefits statements, return-on-investment statements, etc.
7. **Identify and include material supporting the accomplishment of the activity**
 - Examples are screen shots, images, reports, documents, etc.
 - Ex.) For IA_EPA_1 Provide 24/7 Access to MIPS Eligible Clinicians or Groups Who Have Real-Time Access to Patient's Medical Record, printing out audit log or time/date note from outside of normal hours would provide supporting documentation*
8. **Include original attestation forms along with supporting documentation**
9. **Convert all materials to a single file in .pdf format for each activity and store for reference/audit purposes**

CMS Resources:

[QPP Resource Library](#)

[CMS 2023 MIPS Quick Start Guide](#)

[CMS 2023 IA Quick Start Guide](#)

[2023 MIPS Data Validation Criteria](#)

DISCLAIMER: Participation in the OEIS National Registry QCDR does not guarantee satisfactory participation in CMS MIPS program. Successful submission to CMS is contingent upon each individual eligible clinician and/or group meeting the MIPS program requirements and the timeliness, quality, and accuracy of the data they provide for reporting. The information provided is not to be construed as practice management or legal advice. Every reasonable effort has been made to ensure the accuracy of the information presented at the time of posting, but in the unlikely event of certain errors or omissions, OEIS National Registry will not be liable for any loss or damage incurred by third parties arising from the use of the