



Physician Quality Reporting System (PQRS)/MOC



George M. Segall, M.D.
Member-At-Large

Once again, the Centers for Medicare and Medicaid Services (CMS) has qualified/accepted the ABNM Maintenance of Certification Program® (MOC) for the its MOC incentive. The MOC incentive this year is 0.5% of a physician's total Medicare charges. In order to take advantage of this program, a physician must also be participating in CMS' 2013 Physician Quality Reporting System (PQRS) Physicians participating in the PQRS program receive an additional 0.5% incentive payment for Medicare services. Physician participation in CMS' incentives programs is poor due to the fact that program is complicated and hard to understand and the incentives are small (a few hundred dollars); however, these small incentives will become penalties (for those not participating in the future). When the incentives for participating become penalties for not participating, it is likely that these penalties will increase significantly. To avoid significant penalties in the future, we recommend that ABNM diplomates begin to participate in CMS' PQRS and MOC programs

In order to qualify for the additional 0.5% PQRS incentive payment, a physician needs to submit data on quality measures under PQRS for the 12-month reporting period (January 1 through December 31, 2013), either as an individual or as a member of a group practice. Nuclear medicine physicians who are doing radiology must report on 3 PQRS measures; nuclear medicine physicians who are only

doing nuclear medicine, only need to report one PQRS measure because there is only one nuclear medicine specific PQRS measure (correlation of bone scans with other relevant imaging).

In order to qualify for the additional 0.5% MOC incentive payment, a physician needs to apply through the ABR (if practicing radiology – see <http://www.theabr.org/sites/all/themes/abr-media/pdf/MOC-PQRS%202013%20announcement.pdf>) or through the ABNM (if only practicing nuclear medicine see <https://mocmatters.abms.org/default.aspx>). There is a \$30 application fee. Once a nuclear medicine physician applies, the ABNM will submit to CMS on behalf of the eligible physician the following information: 1) The physician is participating more frequently than required in MOC and 2) Confirm that the diplomate has attested that he/she has completed a patient experience of care (PEC) survey.

The definition of “participating more frequently than required in MOC” differs for physicians with life-time certificates compared to physicians with a time-limited certificate. Because physicians with a lifetime certificate are not required to participate in MOC, participation alone meets CMS' more frequently requirement.

Physicians with a time limited certificate must do the following in order to meet CMS' definition of “participating more frequently than required”:

- Part II (lifelong learning and self assessment): Complete more than 25 CME credits per year.

OR

- Part III (cognitive skills assessment): Take the secure examination in year 8 or 9 rather than year 10.

Normally the ABNM will consider a diplomate to be participating in MOC even if they fall up to 3 years behind in their CME requirements. To participate in the CMS program, ABNM requires that diplomates with time limited certificates must attest to the fact that they have completed 25 CME credits each year.

Additional requirements for ALL diplomates are that they must attest to the fact that they

1. Completed a patient experience of care survey
2. Completed a Part IV activity

Although it may appear that participating in this CMS program is quite daunting, participation is quite simple for diplomates who are only practicing nuclear medicine. Once your billing office, is set up to participate in PQRS, participation in the MOC incentive is straight forward. CMS will accept department level patient experience of care surveys. Most nuclear medicine divisions routinely participate in these surveys. Note that to meet the Part IV requirement, you only need to complete a part IV ACTIVITY each year, not a part IV project. Completing the MOC incentive application will take less than 10 minutes.

More information about CMS' 2013 Physician Quality Reporting System (PQRS) Maintenance of Certification Program Incentive can be found at: https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/PQRS/Maintenance_of_Certification_Program_Incentive.html.

If you have additional questions, email us at abnm@abnm.org.