

## MIPS 2023 Promoting Interoperability Changes Most Important to Practices

The **2023 Medicare PFS Final Rule** defined changes to the **MIPS Promoting Interoperability** category. NC AHEC identified seven changes that are likely to be of most interest to practices participating in the MIPS program.

These changes derive from the resource entitled **2023 Promoting Interoperability Quick Start Guide** <https://qpp-cm-prod-content.s3.amazonaws.com/uploads/2230/2023%20Promoting%20Interoperability%20Quick%20Start%20Guide.pdf>

**Changes of most impact or interest include:**

- 1. EHR technology must be certified to the 2015 Edition Cures Update certification criteria for the 2023 performance period:**
  - Functionality must be in place by the start of the performance period with certification obtained by the last day of the performance period.
- 2. Modified options for active engagement for the Public Health and Clinical Data Exchange objective measures:**
  - Combined active engagement options 1 and 2 into a single option titled “Pre-production and Validation” and renamed option 3 to “Validated Data Production” for a total of 2 options.
  - MIPS eligible clinicians are required to submit their level of active engagement for the required Public Health and Clinical Data Exchange measures (with Option 1 or Option 2)
  - Starting with the 2024 calendar year, MIPS eligible clinicians are allowed to spend only one performance period at the Pre-production and Validation level of active engagement per measure. They must progress to the Validated Data Production level in the next performance period for which they report a particular measure.
- 3. Updated the Query of Prescription Drug Monitoring Program (PDMP) measure to make it a required measure beginning with the 2023 performance period:**

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- Added exclusions for the measure and made it worth 10 points.
  - Expanded the scope of the measure to include Schedules III and IV drugs in addition to Schedule II opioids
4. **Added a third option for satisfying the Health Information Exchange (HIE) objective for the 2023 performance:**
    - Option 3: Enabling Exchange under the Trusted Exchange Framework and Common Agreement (TEFCA)
  5. **Updated data submission requirements to give APM Entities participating in MIPS at the APM Entity level the option to report Promoting Interoperability data at the APM Entity Level.**
  6. **Discontinued automatic reweighting for nurse practitioners, physician assistants, certified registered nurse anesthetists, and clinical nurse specialists for the Promoting Interoperability performance category starting with the 2023 performance period.**
  7. **Updated the maximum points for the following Promoting Interoperability measures, beginning with the 2023 performance period (changes from 2022 noted with an asterisk):**

Objective	Measure	Maximum Points	
<b>e-Prescribing</b>	e-Prescribing	10 points	
	Query of PDMP	10 points*	
<b>Health Information Exchange</b>	Option 1	Support Electronic Referral Loops by Sending Health Information	15 points*
		Support Electronic Referral Loops by Receiving and Reconciling Health Information	15 points*
	Option 2	HIE Bi-Directional Exchange	30 points*
	Option 3	Enabling Exchange under TEFCA	30 points*
<b>Provider to Patient Exchange</b>	Provide Patients Electronic Access to Their Health Information	25 points*	
<b>Public Health and Clinical Data Exchange</b>	Report to the following public health or clinical data registries: 1. Immunization Registry Reporting 2. Electronic Case Reporting	25 points*	
	Option to report one of the following public health agency or clinical data registry measures: • Public Health Registry Reporting, OR • Clinical Data Registry Reporting, OR • Syndromic Surveillance Reporting	5 bonus points*	