

## Physician Quality Reporting Initiative (PQRI) Provisions of the 2008 Physician Fee Schedule Proposed Rule

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The Tax Relief and Health Care Act of 2006 (TRHCA) authorizes a physician quality reporting system. This program, which CMS has named the “Physician Quality Reporting Initiative” (PQRI), was implemented on July 1, 2007. The statute also establishes specific requirements for measures for eligible professionals to use to submit data on the quality of covered professional services furnished during 2008, and requires CMS to address a mechanism for registry-based submission of quality data within the reporting system. The 2008 Physician Fee Schedule (PFS) proposed rule includes content addressing these requirements. The proposed rule also solicits comment on CMS’ plans to explore options and test registry-based data submission and to consider, on a limited basis, the potential for electronic health record-based data submission in 2008.

### Proposed 2008 PQRI Quality Measures

CMS proposes to use the Physician Assistance and Quality Improvement (PAQI) fund – established by TRHCA Division B, Section 101(d) – to continue the PQRI, including bonus payments for satisfactory submission of data on PQRI quality measures, in 2008. According to the TRHCA, all measures for use in the 2008 PQRI must have been endorsed or adopted by a consensus organization, such as the National Quality Forum (NQF) or the AQA Alliance (AQA), that includes measures that have been submitted by a physician specialty, and that CMS has identified as having used a consensus-based process for development. In addition, the measures shall include structural measures, such as the adoption and use of health information technology.

The seven broad categories of proposed 2008 PQRI measures include:

- NQF-endorsed 2007 PQRI Quality Measures
- Measures developed through the American Medical Association (AMA) Physician Consortium for Performance Improvement (PCPI)
- Measures for non-physician eligible professionals developed by Quality Insights of Pennsylvania
- Structural measures developed by Quality Insights of Pennsylvania
- Measures from the AQA Starter Set of quality measures that apply to Medicare covered services that were not included in 2007 PQRI measures
- Measures endorsed by the NQF that were not included in the 2007 PQRI quality measures but are relevant to Medicare beneficiaries, address overuse/misuse of pharmacologic therapy, and that expand the specialty applicability and/or patient population
- Measures currently under development by the American Podiatric Medical Association

The 2008 PFS NPRM includes the complete list of proposed measures in each of the seven categories and requirements for final selection of measures from these categories, as well as discussion of consensus organizations, and consensus-based development of quality measures.

### Addressing Registry- and EHR-based Data Submission

The TRHCA requires that CMS address in 2008 a registry-based mechanism for data submission. In the PFS NPRM, CMS describes, and invites comment on, CMS' proposal to test in 2008 at least one option for how registry-based submission would work.

CMS also invites comment on its plan to consider exploring the feasibility of offering eligible professionals the option of submitting clinical quality data extracted from electronic health records directly to a data warehouse, as an alternative to reporting PQRI quality data codes through the administrative claims process.

### To Review and/or Comment on PQRI Content of NPRM

The 2008 PFS proposed rule includes specific information on how interested parties may submit comments to CMS for consideration. The NPRM is available as a download (titled "[CMS-1385-P \[PDF 2MB\]](#)") from the PFS Federal Regulation Notices page of the CMS Physician Fee Schedule section of the CMS website at: <http://www.cms.hhs.gov/PhysicianFeeSched/PFSFRN/list.asp?listpage=2>.