

PQRS Penalties...

RHC are Exempt when Claims were submitted using UB-04!

PQRS penalties apply to Eligible Professionals who submit Medicare claims for professional services paid under or based on the Medicare Physician Fee Schedule (PFS) using the 1500 claim form.

Rural Health Clinic claims are submitted using the UB-04 claim form. Claims submitted using the UB-04 Claim form are exempt from PQRS penalties. I think it is easier to understand if you think about this in terms of the claim form rather than trying to think about it in terms of services or hours of operation.

Did the Eligible Professional (physician, PA, NP, etc.) seek Medicare payment using a 1500 claim form in previous years – specifically 2013? If the answer is yes, and the Eligible Professional did not do PQRS reporting for those claims, then claims submitted in 2015 by those EPs using the 1500 claim form will be subject to the “payment adjustment” (reduction of 1.5%). In future years, the payment adjustment will be 2% on their 1500 claims if they continue to fail to participate in PQRS.

This fact sheet, produced by CMS, may be helpful in understanding this point:

http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/PQRS/Downloads/PQRS_List-of-EligibleProfessionals_022813.pdf

Finally, NARHC has asked CMS to revisit this policy and establish a minimum threshold based upon either number of claims or dollar value that would allow low-volume 1500 claim submitters to be exempt from the penalties. It is not clear whether CMS has the authority to establish such a minimum threshold but we are looking into ways to mitigate or eliminate this penalty for low-volume Medicare Part B Eligible Professionals.

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