AAFP Response
The AAFP concurs with this proposal.

(5) Receipt of Information
CMS expressed a desire to explore ways to receive information from clinicians and anticipates establishing a help desk or technical assistance area to address questions.

AAFP Response
The MIPS LEAN Design team from the CMS Quality Summit in December 2015 spent significant resources and time to identify approaches to streamlining data reporting, accessing reports and establishing help desk and technical assistance for providers, and we encourage CMS to re-visit these recommendations in the design of the information system. In particular, the MIPS LEAN team identified issues with the existence of multiple help desks, multiple CMS information systems that are not integrated, multiple log-ins, inability of first-line help desk personnel to address all but the simplest questions, contradictory responses from help desk personnel, long turn-around time for answers, and long telephone wait times. To remedy this, the AAFP supports a single access point and sign-on to all CMS systems that a clinician may need to access. We support offering multiple routes of assistance accessible from a single access point, including:
- a searchable knowledge database,
- phone support (with email documentation of responses) with a 24-hour turn-around window,
- immediate escalation if first-line help desk staff can't answer a question within 24 hours,
- email support with a 24-hour turn-around window, and
- live chat.

We also support maintaining a centralized, integrated database of question-and-response data that can be used to train help desk personnel, enrich the searchable knowledge database, and identify common areas of misunderstanding among clinicians for targeting program education. The AAFP supports creation of a dashboard for each physician/TIN that will allow he or she to review individual and/or group demographic information (including PECOS), data-submission status for the current reporting period, CPS, performance on all measures, feedback reports, and help desk access history, as well as other timely information that will help physicians better understand how quality reporting is impacting their Medicare reimbursement.

(6) Additional Information-Type of Information
MACRA states that by July 1, 2018, CMS shall make available to MIPS-eligible clinicians information about items and services for which payment is made under Title 18 to individuals who are patients of MIPS-eligible clinicians. This would include the name of who provided it, what was provided, when, and allowed charges.

AAFP Response
To improve the use of this information, the AAFP suggests that eligible clinicians looking to improve their resource use will find that information helpful. Other ways to make this information more robust would be alternatives to the items or services provided that would have been more cost effective for the patient, while still delivering the same quality of care. For example, if service A costs $100, that is fine to report. However, if the same report points out that same service is available from an equally qualified entity for $50, real change can be made. Taking