



ABCMO and CMS

Medicare Bonus Systems

In 2009, Medicare offered 2% bonuses on Part B billings to optometrists participating in PQRS (Physician Quality Reporting System) and 2% bonuses to those using e-Rx programs.

The Centers for Medicare and Medicaid (CMS) reported 29,949 ODs were eligible in 2009 for these two bonus programs but that few took part.

- 1,859 ODs earned 2% PQRS bonuses that averaged \$1,168 [median \$653]
- 1,559 ODs earned 2% e-Rx bonuses that averaged \$1,265 [median \$729]

Only 6.2% of eligible ODs took part in PQRS and 5.2% took part in e-Rx.

Of ODs billing CMS, less than 20% applied for the bonuses.

The average OD participating in these CMS bonus programs had annual Part B billings of \$60,825. But, with the median bonus being only about one-half the average bonus, the optometrists taking part tended to be those billing well above \$60,825 per year and able to afford the infrastructural costs associating with the considerable CMS reporting requirements. Thus it did not make sense for those having modest Part B billings to take on the administrative time and costs to participate.

Additional CMS Bonus Programs In 2011

1. In 2011, all ODs also became eligible for a 0.5% (1/2%) bonus on Part B billings by utilizing electronic health records systems (EHR).
2. In 2011 an MOC bonus of 0.5% (1/2%) became available to “eligible professionals” who:
 - Hold a “medical license” and,
 - Are board certified in an American Board of Medical Specialists (ABMS) medical specialty or its equivalent and,
 - Participate in a maintenance of certification (MOC) program conducted by an ABMS specialty board or its equivalent and,
 - Significantly exceed the MOC requirements of their specialty board.

In February 2011, the American Board of Optometry self-dominated its MOC for the MOC bonus although it is not a specialty board, does not certify specialists and few optometrists hold medical licenses. CMS has yet to rule whether their MCO program meets the requirements listed in paragraph 2.

Only 7 of 41 specialty boards for holders of medical licenses self-nominated an MOC program (the American Board of Ophthalmology did not) nor did any dental or podiatry specialty board.

Potential MOC Bonus About \$304 per Year

If the MOC bonus had been in effect in 2009, ODs taking part in the 2% bonus programs would have earned an additional average bonus of about \$304.

Less than 7% of the 29,940 eligible ODs took part in either 2% bonus program in 2009 and their average bonus was skewed upwards by ODs with Part B billings above \$60,825 per year who were likely associated with medical group facilities.

Since all ODs are now eligible for up to a total of 4.5% of Part B billings in bonus payments, seeking the additional MOC 0.5% bonus may not make economic sense for other than a small number of optometrists with very large Medicare practices.

The 2% bonuses were once each 4% and CMS has a history of reducing bonuses to zero and then assessing penalties for not participating. I suspect this may be an additional reason why few medical specialty boards applied for the MOC bonus since its paperwork is complicated.

ABCMO did not self-nominate our MOC because we could not honestly argue a license to practice optometry is a “medical license” although our certification process and MOC are the equivalent of those of ABMS specialty boards and because the MOC bonus is not cost-effective.

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1. Per Wikipedia, “Only those with medical degrees from schools listed in the WHO Directory of Medical Schools or the FAIMER International Medical Education Directory are permitted to apply for medical licensure.”
2. The CMS “Compare Physician” website states optometrists are not medical doctors.
3. The accepted definitions of “medical doctor” is a practitioner holding a “medical license”