How to Participate in the 2022 Merit-based Incentive Payment System (MIPS) Using a Centers for Medicare & Medicaid Services (CMS)-Approved Qualified Clinical Data Registry (QCDR) or Qualified Registry

This resource is an informational guide to support clinicians, groups, virtual groups and/or Alternative Payment Model (APM) Entities with selection of a QCDR and Qualified Registry and participation in MIPS using a QCDR and Qualified Registry.

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Third party intermediaries are CMS-approved entities that act as intermediaries on behalf of MIPS eligible clincians for submission of MIPS data to CMS for one or more of the quality, improvement activities, and Promoting Interoperability performance categories. They do not directly support the cost performance category as CMS collects and calculates the data for the cost performance category. Third party intermediaries may support MIPS eligible clinicians that participate as individual clinicians, groups, virtual groups and/or APM entities, inclusive of opt-in, and/or voluntary participants.

Third party intermediaries are intended to decrease burden on MIPS eligible clinicians. They include QCDRs, Qualified Registries, health information technology (IT) vendors, and CMS-approved survey vendors. **Please note that this guide will focus on QCDRs and Qualified Registries only**.

What is a QCDR?

A QCDR is defined as an entity that demonstrates clinical expertise in medicine and quality measurement development that collect medical or clinical data on behalf of a MIPS eligible clinician to track patients and diseases to foster improvement in the quality of care provided to patients.

A QCDR may include:

- An entity with clinical expertise in medicine. Clinicians must be on staff with the organization and lend their clinical expertise in the work carried out by the organization as a QCDR.
- An entity with stand-alone quality measurement development experience.
- An entity that collects medical or clinical data on behalf of a clinician for the purpose of patient and disease tracking to foster improvement in the quality of care provided to patients.
- An entity that uses an external organization for purposes of data collection, calculation, or transmission may meet the definition of a QCDR as long as the entity has a signed, written agreement that specifically details the relationship, roles and responsibilities of the entity with the external organization effective as of September 1 the year prior to the year for which the entity seeks to become a QCDR.

What is a Qualified Registry?

A Qualified Registry is a data intermediary that collects MIPS data from MIPS eligible clinicians and submits it to CMS on their behalf. Clinicians typically work directly with their chosen Qualified Registry to submit data on the selected measures or activities they have selected.

Should I select a QCDR or Qualified Registry as my third party intermediary?

Both QCDRs and Qualified Registries are able to collect and submit data to CMS on behalf of MIPS eligible clinicians. Unlike Qualified Registries, QCDRs have the opportunity to develop and support up to 30 CMS-approved QCDR measures. The QCDR measures are an additional set of quality measures available only for reporting through a QCDR. The QCDR measures may include specialty specific measures or disease process measures that are not available within the MIPS quality measures inventory.

How do I select a QCDR or Qualified Registry?

Every year, CMS publishes a list of CMS-approved QCDRs and Qualified Registries that self-nominated to participate as a QCDR and Qualified Registry for the MIPS performance period. The 2022 QCDR Qualified Posting and the 2022 Qualified Registry Qualified Posting are available on the Quality Payment Program (QPP) Resource Library.

The 2022 QCDR Qualified Posting and Qualified Registry Qualified Posting is a list of all entities that are authorized by CMS to submit quality measures, improvement activities, and/or Promoting Interoperability measures on behalf of the individual clinician, group, virtual group and/or APM Entity for purposes of the 2022 MIPS performance period. These entities are approved as QCDRs and/or Qualified Registries by CMS through the MIPS Self-Nomination process. CMS has not otherwise evaluated the capabilities, quality, or any other features of any specific entity or its products referenced on the 2022 QCDR Qualified Posting or 2022 Qualified Registry Qualified Posting. Reference to any specific entity, commercial product, process, or service (collectively, "specific entity or its products") does not constitute any endorsement or recommendation of the specific entity or its products by CMS or the United States Government.

Such reference does not imply that a specific entity or its products meets any other federal health care program requirements applicable to the entity or its products or to the individual clinician, group, virtual group and/or APM Entity on whose behalf the entity submits data to CMS. Prior to selecting or using any specific entity or its products, the individual clinician, group, virtual group and/or APM entity should perform their own due diligence on the entity and its products, including contacting the entity directly to learn more about its products.

Getting Started with the 2022 QCDR Qualified Posting or 2022 Qualified Registry Qualified Posting

The 2022 QCDR and/or Qualified Registry Qualified Posting resources contain a significant amount of information useful in selecting a QCDR or Qualified Registry for the 2022 MIPS performance period.

Version History Tab

The qualified postings contain a Version History tab communicating updates within the qualified postings made after the initial publication. If updates are available to be communicated, the QCDR and/or Qualified Registry Qualified Posting resources are updated on a monthly basis throughout the year. These updates may include QCDR or Qualified Registry status updates as entities may withdraw, be subject to remedial action, and/or terminated throughout the performance period.

2022 Qualified Clinical Data Registry (QCDR) Qualified Posting: Version History		
Date	**Version**	**Summary of Changes**

Table of Contents Tab

The qualified postings contain a Table of Contents (TOC) that includes a hyperlinked list of QCDRs and Qualified Registries approved as third party intermediaries for the 2022 MIPS performance period, as well as information regarding which performance categories (quality, improvement activity, Promoting Interoperability) are supported by the QCDR or Qualified Registry. MIPS eligible clinicians should identify QCDRs or Qualified Registries that support the applicable performance categories needed for reporting.

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The remaining tabs of the qualified postings contain detailed information specific to each QCDR or Qualified Registry. Each QCDR and Qualified Registry provides the information included within the qualified posting and provides approval of accuracy prior to CMS publishing the 2022 QCDR Qualified Posting or 2022 Qualified Registry Qualified Posting. Detailed information regarding the information contained within this tab in included within the table below.

Column Name	Information
QCDR/Qualified Registry Name	Entity name provided by QCDR or Qualified Registry
Remedial Action/Termination as Third Party Intermediary	Indication of whether the QCDR or Qualified Registry is currently subject to a corrective action plan or has been terminated in the current MIPS performance year.
Organization Type	Identification of type of organization, including Collaborative, Health IT Vendor, Health Information Exchange/Regional Health Information Organization, Regional Health Collaborative, Specialty Society, or Other (with description)
Specialty	Clinical specialties supported by QCDR or Qualified Registry
New QCDR or Qualified Registry or Years QCDR or Qualified Registry Previously Participated	Indication of a New or Existing QCDR or Qualified Registry. If existing QCDR or Qualified Registry, the years of participation will be included
Contact Information	Organization name, address, and phone number
Website	Organization website
Cost	Detailed information regarding the cost(s) incurred by the QCDR or Qualified Registry clients
Services Offered	Detailed information regarding the services offered to the QCDR or Qualified Registry clients
Last Date to Accept New Clients for 2022 MIPS Performance Period	Last date the QCDR or Qualified Registry can accept new clients for the 2022 MIPS performance period
Reporting Options Supported	A list of supported reporting options for the 2022 MIPS performance period, including clinicians, groups, virtual groups, and/or APM Entities
Virtual Groups Specialty Parameters (if applicable)	If Virtual Groups are selected within the Reporting Options, QCDRs and Qualified Registries will notate the virtual group specialty parameters for which they will support
Improvement Activities Supported	A list of all supported improvement activities for the 2022 MIPS performance period
Promoting Interoperability Supported	A list of all supported Promoting Interoperability measures for the 2022 MIPS performance period
MIPS Clinical Quality Measures (CQMs) Supported	A list of all supported CQMs for the 2022 MIPS performance period
MIPS Electronic Clinical Quality Measures (eCQMs) Supported	A list of all supported eCQMs for the 2022 MIPS performance period
QCDR Measures Supported (QCDR Qualified Posting Only)	A list of all approved and supported QCDR measures for the 2022 MIPS performance period

Selecting a QCDR or Qualified Registry using the 2022 QCDR Qualified Posting or 2022 Qualified Registry Qualified Posting

MIPS eligible clinicians should use the following steps to identify QCDRs or Qualified Registries that may be able to fill their reporting needs. It may be beneficial to identify more than one applicable QCDR and/or Qualified Registry and research the options to identify the best possible QCDR and/or Qualified Registry for you.

| Select a QCDR or Qualified Registry | → | Identify Performance Categories Supported | → | Identify Reporting Options Supported | → | Identify Measures and Activities Supported | → | Review Accompanying Information |
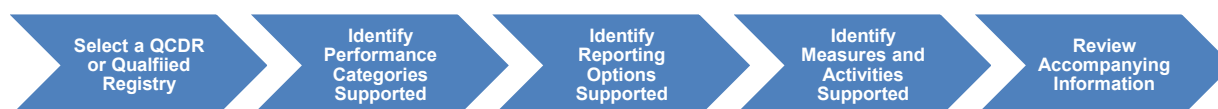
Step 1. Identify if a QCDR or Qualified Registry will suit your reporting needs.

Both QCDRs and Qualified Registries are able to collect and submit MIPS data to CMS on behalf of MIPS eligible clinicians. Unlike Qualified Registries, QCDRs have the opportunity to develop and support up to 30 CMS-approved QCDR measures. The QCDR measures are an additional set of quality measures available only for reporting through a QCDR. The QCDR measures may include specialty specific measures or disease process measures that are not available within the MIPS quality measures inventory.

Step 2. Identify a QCDR(s) or Qualified Registry(ies) that offers the applicable performance categories needed.

Performance Categories Supported
- Quality
- Improvement Activities
- Promoting Interoperability

Identify a QCDR(s) and/or Qualified Registry(ies) that support the performance categories meeting your reporting needs. For the 2022 MIPS performance period, QCDRs and Qualified Registries are required to support the quality, improvement activities and Promoting Interoperability performance categories; however, some QCDRs and/or Qualified Registries qualify for an exception and do not support all categories. A third-party intermediary may be excepted from the requirement to support the Promoting Interoperability performance category if all supported MIPS eligible clinicians fall under the reweighting policies.[1] In instances where some of the participants do not fall under the reweighting policies described above, the QCDR or Qualified Registry will be expected to comply with the requirements.

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[1] §414.1380(c)(2)(i)(A)(4) or (5) or (c)(2)(i)(C)(1) through (7) or (c)(2)(i)(C)(9)

Step 3. Identify a QCDR(s) or Qualified Registry(ies) that offers the applicable reporting options needed.

Reporting Options Supported
- Individual Clinician
- Group
- Virtual Group
- APM Entity

Identify a QCDR(s) and/or Qualified Registry(ies) that support the reporting option for which you are planning to participate in the MIPS program.

Step 4. Identify a QCDR(s) or Qualified Registry(ies) that offers the applicable activities and measures needed.

Measures and Activities Supported
- Improvement Activities
- Promoting Interoperability
- MIPS CQMs
- MIPS eCQMs
- QCDR Measures

Identify a QCDR(s) and/or Qualified Registry(ies) that support the improvement activities, Promoting Interoperability measures, MIPS CQMs, MIPS eCQMs and/or QCDR measures for which you are planning to submit to CMS for purposes of MIPS. Additional information regarding the improvement activities, Promoting Interoperability measures, MIPS CQMs, MIPS eCQMs, and QCDR measures available for the 2022 MIPS performance period can be accessed on the QPP Resource Library or at the following locations:

- 2022 Improvement Activities Inventory
- 2022 Promoting Interoperability Measure Specifications
- 2022 Clinical Quality Measure Specifications and Supporting Documents
- 2022 Electronic Clinical Quality Measures (eCQMs) Specifications
- 2022 Qualified Clinical Data Registry (QCDR) Measure Specifications

Step 5. Review the accompanying information to evaluate the QCDR(s) or Qualified Registry(ies) to identify the ideal candidate.

Accompanying Information
- Remedial Action/Terminated
- New / Existing
- Cost
- Services
- Last Day to Accept New Clients

Review the accompanying information, regarding remedial action/termination, new/existing participation, cost, services and/or last day to accept new clients to identify the ideal candidate for your reporting needs. You may also wish to research the QCDR(s) and/or Qualified Registry(ies) on your own or contact them directly for more information.

Step 6. Contact the QCDR(s) and/or Qualified Registry(ies).

Contact the QCDR(s) and/or Qualified Registry(ies) to begin contract discussions and/or commit to a specific QCDR and/or Qualified Registry. At this phase you will work with your QCDR or Qualified Registry to begin participating with the third party intermediary.

What to expect when participating with a QCDR or Qualified Registry?

QCDRs and Qualified Registries must meet certain requirements to be approved and included in the Qualified Posting. These requirements are detailed further within the 2022 Self-Nomination Toolkit for QCDRs and Registries available on the QPP Resource Library. MIPS eligible clinicians participating with a QCDR or Qualified Registry should familiarize themselves with these requirements, especially with those listed below as they are requirements that involve their clinician, group, virtual group, and/or APM Entity clients.

Business Associate Agreements
QCDRs and Qualified Registries must enter into and maintain with its participating MIPS eligible clinicians an appropriate business associate agreement that provides for the QCDR's or Qualified Registry's receipt of patient-specific data from a MIPS eligible clinician, as well as the QCDR's or Qualified Registry's disclosure of quality measure results and numerator and denominator data or patient specific data on Medicare and non-Medicare beneficiaries. Business associate agreements must meet the requirements of any applicable laws and regulations, as well as comply with Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rules. MIPS eligible clinicians should work with their QCDR or Qualified Registry to ensure this legal contract is finalized according to the nature of their relationship with the QCDR or Qualified Registry.

Clinician Consents

QCDRs and Qualified Registries must obtain, and keep on file, signed documentation that each holder of a national provider identifier (NPI) whose data are submitted to the QCDRs and Qualified Registries, has authorized the QCDR or Qualified Registry to submit quality measure results, improvement activity results, Promoting Interoperability results and numerator and denominator data or patient-specific data on Medicare and non-Medicare beneficiaries to CMS for the purpose of MIPS participation. This consent must meet the requirements of any applicable laws, regulations, and contractual business associate agreements. Individual clinicians participating in MIPS via a QCDR or Qualified Registry must grant permission to the QCDR or Qualified Registry to submit their data to CMS. Groups, virtual groups, and/or APM Entities participating in MIPS via a QCDR or Qualified Registry may have their group's duly authorized representative grant permission to the QCDR or Qualified Registry to submit their data to CMS. MIPS eligible clinicians should work with their QCDR or Qualified Registry to ensure proper consent is given to the QCDR and/or Qualified Registry.

Feedback Reports

QCDRs and Qualified Registries are required to provide timely feedback, at least four times a year, on all of the MIPS performance categories that the QCDR of Qualified Registry will report to CMS for purposes of MIPS. This feedback provides specific feedback regarding how the

clinician, group, virtual group and/or APM Entity compares to others who have submitted data on a given measure or activity within the QCDR or Qualified Registry. The feedback should be given to the clinician, group, virtual group, and/or APM Entity at the participant level for which the QCDR or Qualified Registry reports. The QCDR or Qualified Registry is only required to provide feedback based on the clinician's, group's and/or virtual group's data that is available at the time the performance feedback is generated. An available dashboard that provides real-time feedback throughout the 2022 MIPS performance period will suffice as meeting this feedback requirement. If a real-time feedback dashboard is available to clinicians, CMS asks that the QCDR or Qualified Registry e-mail MIPS eligible clinicians at least four times a year, to remind them the feedback is available. MIPS eligible clinicians should work with their QCDR or Qualified Registry to ensure proper consent is given to the QCDR and/or Qualified Registry.

Where Can You Go for Help?

Contact the Quality Payment Program Service Center at 1-866-288-8292, Monday through Friday, 8 a.m. - 8 p.m. Eastern Time (ET) or by e-mail at: QPP@cms.hhs.gov (Monday-Friday 8 a.m.- 8 p.m. ET). To receive assistance more quickly, please consider calling during non-peak hours—before 10 a.m. and after 2 p.m. ET.

Customers who are hearing impaired can dial 711 to be connected to a TRS

Connect with your local technical assistance organization. We provide no-cost technical assistance to **small, underserved, and rural practices** to help you successfully participate within the QPP.

Visit the QPP website for other help and support information, to learn more about MIPS, and to check out the resources available in the QPP Resource Library.

Additional Resources

The QPP Resource Library houses fact sheets, specialty guides, technical guides, user guides, helpful videos, and more.

Resource	Description
2022 Self-Nomination Toolkit for QCDRs and Registries	Contains resources for QCDRs and Qualified Registries to self-nominate for the 2022 performance period.
2022 Qualified Registries Qualified Posting	Provides a list of the 2022 Qualified Registries for the MIPS.
2022 Qualified Clinical Data Registries (QCDRs) Qualified Posting	Provides a list of the 2022 QCDRs for the MIPS.
2022 Qualified Clinical Data Registry (QCDR) Measure Specifications	Provides a list of the 2022 QCDR measures and corresponding calculations.
2022 Promoting Interoperability Measure Specifications	Provides a detailed overview of the requirements for the 2022 Promoting Interoperability performance category objectives and measures.

Resource	Description
2022 Improvement Activities Inventory	Provides a complete list of the 2022 improvement activities and includes descriptions for each.
2022 MIPS Quality Measures List	Provides a detailed list of the 2022 MIPS quality measures.
2022 Clinical Quality Measure Specifications and Supporting Documents	Provides comprehensive descriptions of the 2022 CQM for the MIPS quality performance category.
2022 eCQM Specifications and Supporting Documents	Provides comprehensive descriptions of the 2022 eCQMs for the MIPS quality performance category.

Version History Table

If we need to update this document, changes will be identified here.

Date	Change Description
01/05/2022	Original version