Quality Payment



Merit-based Incentive Payment System (MIPS)

2021 Opt-in and Voluntary Reporting Election Process Guide







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<u>Purpose:</u> This guide will cover the general information about opt-in elections, as well as the election process on the <u>Quality Payment Program (QPP) website</u> for practice representatives (staff, clinicians, solo practitioners) and Qualified Clinical Data Registries (QCDRs)/Qualified Registries. Both practice representatives and QCDRs/registries can submit opt-in elections on behalf of a group and individual clinicians, but the workflow differs.





How to Use This Guide



Please note: This guide was prepared for informational purposes only and isn't intended to grant rights or impose obligations. The information provided is only intended to be a general summary. It isn't intended to take the place of the written law, including the regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

Table of Contents

The table of contents is interactive. Click on a chapter in the table of contents to read that section.



You can also click on the icon on the bottom left to go back to the table of contents.

Hyperlinks

Hyperlinks to the <u>Quality Payment Program website</u> are included throughout the guide to direct the reader to more information and resources.





Opt-In Eligible Clinicians and Groups

A clinician or group that is otherwise eligible for the Merit-based Incentive Payment System (MIPS) and exceeds 1 or 2, but not all 3 low-volume threshold criteria, is considered "opt-in eligible".

If you're opt-in eligible, you can:

- Do nothing. You don't exceed the low-volume threshold and aren't required to participate in MIPS.
- **Elect to opt-in.** If you choose to opt-in, you'll submit data, receive performance feedback, and receive a MIPS payment adjustment in 2024.
- **Elect to voluntarily report.** If you don't want to receive a MIPS payment adjustment in 2024, but want to participate in MIPS, you can voluntarily report data and receive limited performance feedback on the data you report.

You must submit and confirm an election to opt-in or voluntarily report for your opt-in eligible clinicians and groups before their data can be submitted. Once an election is made to opt-in or voluntarily report, **the decision is final and can't be reversed.**

NOTE: We no longer evaluate APM Entities for eligibility against the low-volume threshold. APM Entities can't opt-in to MIPS. However, opt-in eligible clinicians and groups who are also MIPS APM Participants can opt-in to participate in traditional MIPS and/or the APM Performance Pathway (APP) at the individual or group level.

Don't Want to Submit Data?

Opt-in eligible clinicians, and groups, and APM entities that don't not want to submit data **DON'T** have to make an election.



Important Dates and Deadlines: Opt-in and Voluntary Reporting Elections



- **Updated MIPS eligibility determinations for the 2021 performance period is released**, data is reconciled from the two 12-month segments of the MIPS <u>Determination Period</u>.
- HOW DO I KNOW IF I'M ELIGIBLE?
 - Now that eligibility data has been updated, check your MIPS eligibility status for the 2021 performance period using the Quality Payment Program Participation Status Tool.



- 2021 opt-in and voluntary reporting election period and data submission period opens January 3, 2022.
- HOW DO I ELECT TO OPT-IN OR REPORT VOLUNTARILY?
 - Sign into the QPP website to complete the opt-in or voluntary reporting election in order to submit data.
 - If you're working with a QCDR or Qualified Registry, they can also complete this election on your behalf before submitting your data.



- 2021 opt-in and voluntary reporting election period and data submission period ends on March 31,
 2022.
- WHEN DO I NEED TO ELECT TO OPT-IN OR REPORT VOLUNTARILY BY?
 - If you are opt-in eligible and want to submit data, you must complete your opt-in or voluntary reporting election and submit your data by **March 31st.**

Opt-In Eligible Individuals and Groups

Individual Clinicians	Groups
Opt-in eligible clinicians will see the following status on the QPP Participation Status Tool . MIPS Eligibility: INDIVIDUAL Opt-in Option: Opt-in-eligible as individual	Opt-in eligible groups will see the following status on the QPP Participation Status Tool . MIPS Eligibility:
 If you're are opt-in eligible as an individual, you can: Make an individual election to opt-in or voluntarily report to traditional MIPS so you can submit data as an individual; Individual clinicians in a MIPS APM: Make an election to opt-in to report the APM Performance Pathway (APP) as an individual (you can't voluntarily report the APP) Do nothing (you're not required to participate in MIPS as an individual or make an election). 	 If you're are opt-in eligible as a group, you can: Make a group election to opt-in or voluntarily report to traditional MIPS so you can submit data as group; Groups w/ clinicians in a MIPS APM: Make an election to opt-in to report the APM Performance Pathway as a group (you can't voluntarily report the APP); the APP only counts for the MIPS eligible clinicians in the group that participate in a MIPS APM. Do nothing (you're not required to participate in MIPS as a group or make an



Opting-In vs. Voluntary Reporting

If you're are opt-in eligible for the 2021 performance period <u>and</u> want to submit MIPS data, you need to choose whether to **opt-in** or **voluntarily report**.

	If You Elect to Opt-in:	If You Elect to Voluntarily Report:
V	Participants in a MIPS APM can choose whether to report via the APM Performance Pathway or traditional MIPS.	 ✓ Participants in a MIPS APM can voluntarily report via traditional MIPS. × You can't voluntarily report via the APM Performance Pathway.
✓	You will receive a MIPS payment adjustment (positive, negative, or neutral).*	✓ You won't receive a payment adjustment.
√	You'll receive performance feedback.	 ✓ You'll receive limited performance feedback × You won't receive feedback on cost measures or claims quality measures.
1	Your data will be included in measure benchmark calculations.	× Your data won't be included in measure benchmark calculations.
√	Your data will be made available for public reporting on Doctors & Clinicians on Medicare Care Compare).	 ✓ Your data will be made available for public reporting on Doctors & Clinicians on Medicare Care Compare. Voluntary reporters can choose to opt-out of having their data publicly reported during the Care Compare Preview period on QPP in late 2022.

While unlikely, it's possible that both a practice and a clinician are opt-in eligible. If the practice elects to opt-in as a group and the clinician elects to opt-in as an individual, the clinician would be assigned get the higher of the two final scores and associated payment adjustment.



^{*} If you opt-in as a group, all MIPS eligible clinicians in the practice will receive a payment adjustment based on the group's performance.

What Do I Need to do to Prepare for This Election Process?

To complete the election to opt-in or report voluntarily, you need to:



Verify Your MIPS Eligibility for the 2021 performance period.

• Check your final MIPS eligibility using the Quality Payment Program Participation Status Tool.



Confirm and Communicate Your Decision to Opt-in or Voluntarily Report.

If you're working with a QCDR or Qualified registry, make sure to communicate whether you
want to opt-in or voluntarily report traditional MIPS, or opt-in to report the APM
Performance Pathway.



Have a HARP Account and QPP Role to complete the election.

 Review the Quality Payment Program Access User Guide for information about creating an account and requesting a QPP role.

Submitting Opt-in and Voluntary Reporting Elections via Application Programming Interface (API)

Authorized QCDR and Qualified Registry representatives can submit opt-in and voluntary reporting elections on behalf of their opt-in eligible clients via the <u>Quality Payment Program Eligibility Application Programming Interface</u> (API).

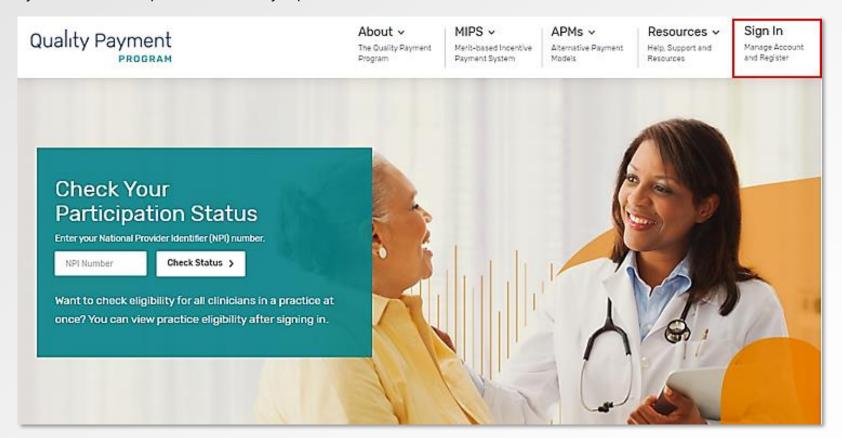
- Elections can be made during the submission period (January 3, 2022 through March 31, 2022).
- <u>Eligibility API documentation</u> contains instructions on how to submit opt-in and voluntary reporting elections.
- Elections must be made before you can use the <u>Submissions API</u> to submit data on behalf of opt-in eligible clients.





Navigate to the QPP Website

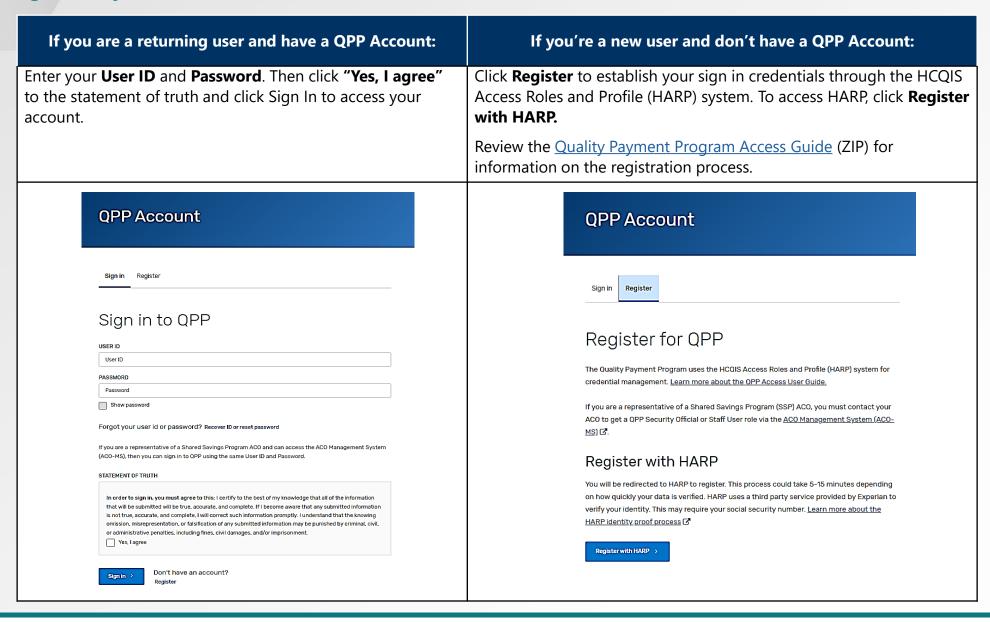
All users will navigate to the <u>QPP website</u> and click **Sign In** found in the upper right corner of the page to sign in to your QPP Account to complete your election to opt in or voluntarily report.



Disclaimer: This guide captures images of the process for opting-in or voluntarily reporting. The information captured in the screenshots may not be the exact language, workflow, or design that is finalized in the system on January 3, 2022.



Sign in to your QPP Account

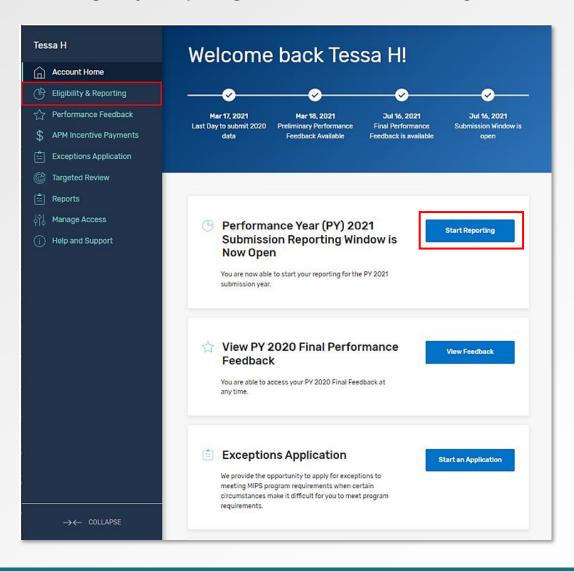




Sign in to the QPP Website to Complete Your Election

Navigate to Eligibility & Reporting

After you successfully sign in, click the **Eligibility & Reporting** tab found in the left-hand navigation or **Start Reporting**.







Election Process

Election Process Workflows

Both practice representatives and QCDRs/registries can submit opt-in elections on behalf of a group and individual clinicians, but the workflow differs:

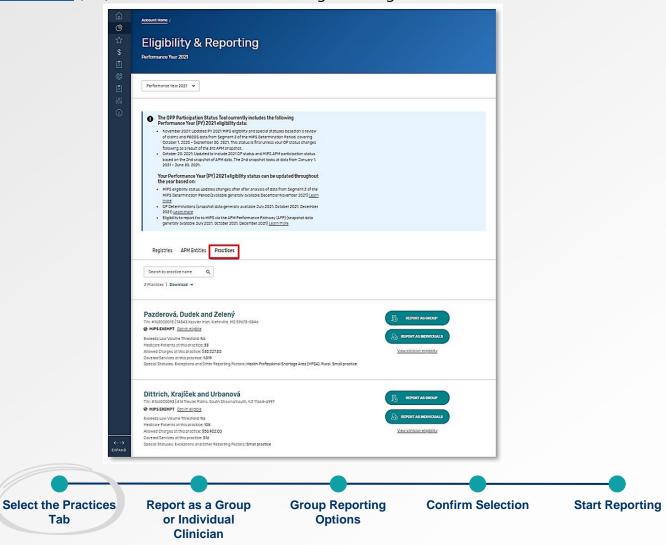
- Practice Representatives (i.e. Staff, Clinicians, Solo Practitioners)
- QCDRs and Qualified Registries





Step 1: Select the Practices Tab

Click on the **Practices** tab and review the practices you are connected to. If you don't see a practice, please refer to the <u>Quality</u> <u>Payment Program Access Guide</u> (ZIP) for information on connecting to an organization.



Step 2: Report as a Group or Individual Clinician

Select **Report as Group** (or **Report as Individuals)** to the right of the practice's eligibility summary to begin the election process.

- This guide uses a group election example.
- If you select **Report as Individuals** a list of clinicians associated with the practice will populate. Select **Report as Individual** to the right of an opt-in eligible clinician's name to make an election for that clinician.

Dittrich, Krajíček and Urbanová

TIN: #166000093 | 414 Treutel Plains, South Shawnamouth, NJ 11664-6997

Ø MIPS EXEMPT Opt-in eligible

Exceeds Low Volume Threshold: No Medicare Patients at this practice: 108 Allowed Charges at this practice: \$50,902.00

Covered Services at this practice: 516

Special Statuses, Exceptions and Other Reporting Factors: Small

practice



Reminder: If your practice is participating as a group, you don't need to make an election for individual clinicians unless they are also submitting individual data.



Step 3: Group Reporting Options

Reporting options for the group (or individual clinician) will populate with descriptions of each election option.

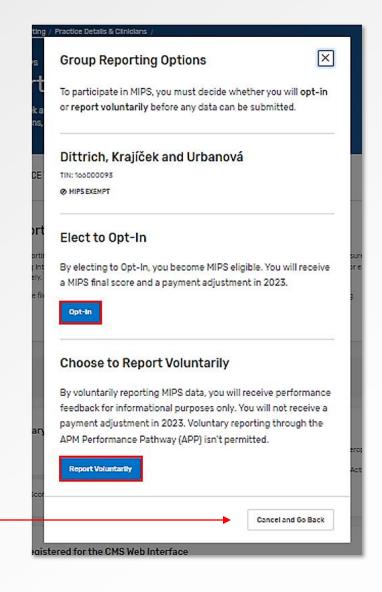
Select either **Opt In** or **Report Voluntarily** to proceed with the election process.

 Select Opt-In if you're electing for the practice to receive a MIPS final score based on a group submission and for all MIPS eligible clinicians to receive a payment adjustment.

OR

- Select Report Voluntarily if you're electing for the practice to receive a MIPS final score based on a group submission, but no payment adjustment for the MIPS eligible clinicians.
 - NOTE: You can't voluntarily report the APM Performance Pathway.

Change Your Mind? If you change your mind, you also can **cancel and go back** to the main Eligibility & Reporting page.





Report as a Group or Individual Clinician

Group Reporting Options **Confirm Selection**

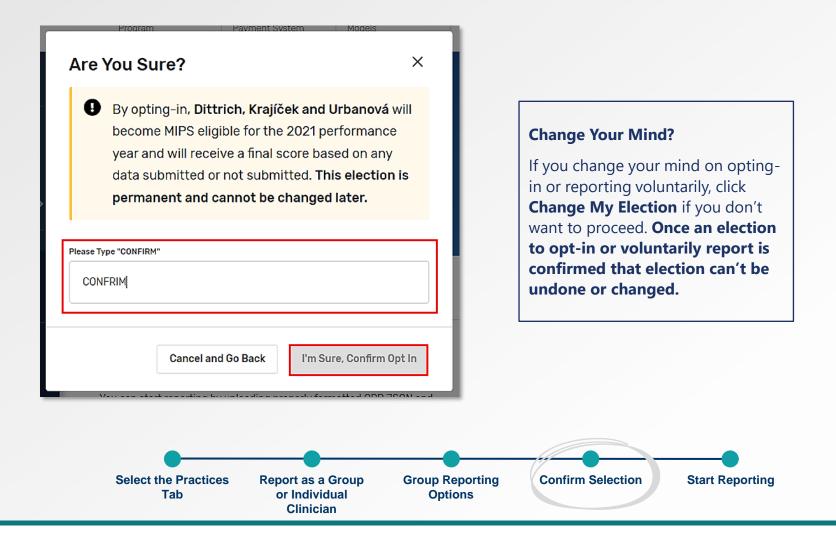
Start Reporting



Step 4: Confirm Selection

Verify your election by typing "CONFIRM" in the text field and clicking I'm Sure, Confirm Opt In or I'm Sure, Report Voluntarily.

Next, you will receive a message confirming your election and the option to Continue Reporting.



Reminder: The submission period is January 3, 2022 to March 31, 2022.

Step 5: Start Reporting

Reporting Overview	Reporting Options (MIPS APM Participants Only)
Once you confirm your election, you'll be brought to the Reporting Overview page, where you can begin submitting data.	If you elected to opt-in, you'll be brought to the Reporting Options page where you'll be required to indicate if you're reporting to traditional MIPS or the APM Performance Pathway. (As a reminder you can't voluntarily report the APM Performance Pathway.)
Eligibility & Reporting / Practice Details & Clinicians / TRADITIONAL MIPS Reporting Overview Smith ENT The 000000416 831 Lord Village, Landenburgh, IN 494343259 PERFORMANCE VEAR 2021	Eligibility & Reporting / Practice Octails & Cinicians / Reporting Options Bogan - Lucilivitz TiN: 549003603 837 Elmore Mount: Apt. 645, Botsfordmouth. KS 099014313 For All MIPS Eligible Clinicians in a MIPS APM
Start reporting You can start reporting by uploading properly formatted OPP 350N and ORDA III files that can contain Quality measures. and/or Promoting Interoperability measures, and/or Improvement Activities. You can also scroll down and report for each category separately. Remember: These files will be calculated immediately and the page below will update with your preliminary scoring information.	APM Performance Pathway (APP) This reporting option is available to all MIPS eligible clinicians participating in a MIPS APM who must report to MIPS. Learn more about the APP & Start Reporting
All changes are saved automatically.	For All MIPS Eligible Clinicians
Preliminary Total Score - Quality/65 - Promoting Intersperability N/A - Improvement Activities/15 Your Final Score won't be available until Summer 2022.	Traditional MIPS This reporting option is available to all MIPS eligible clinicians who must report to MIPS. Learn more about Traditional MIPS. Start Reporting

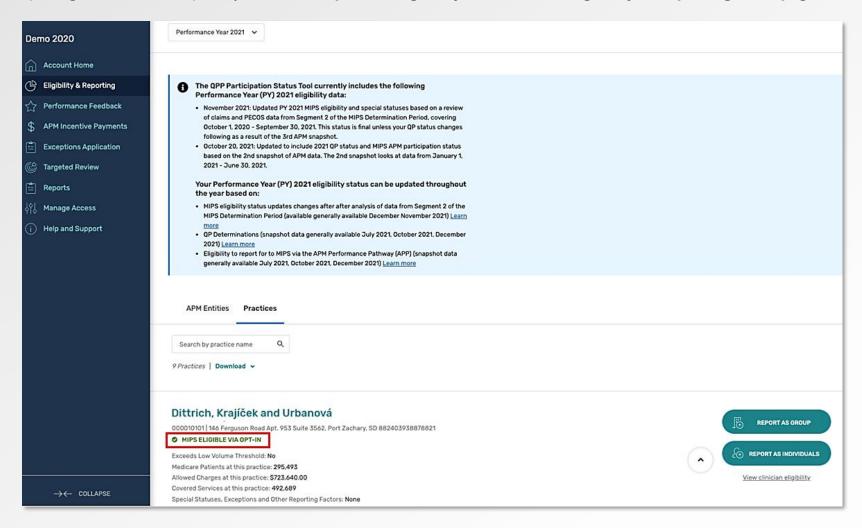






Participation Update on Eligibility & Reporting Homepage

After completing an election to opt-in, you'll see an updated eligibility status on the Eligibility & Reporting homepage.



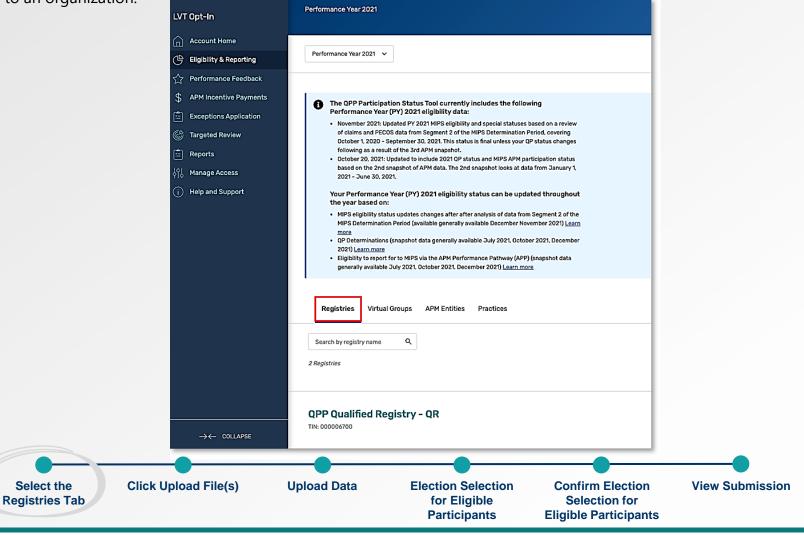




Step 1: Select the Registries Tab

Click on the **Registries** tab and review the qualified registries and/or QCDRs you are connected to. If you don't see a registry or QCDR that you should be connected with, please refer to the <u>Quality Payment Program Access Guide</u> (ZIP) for information on

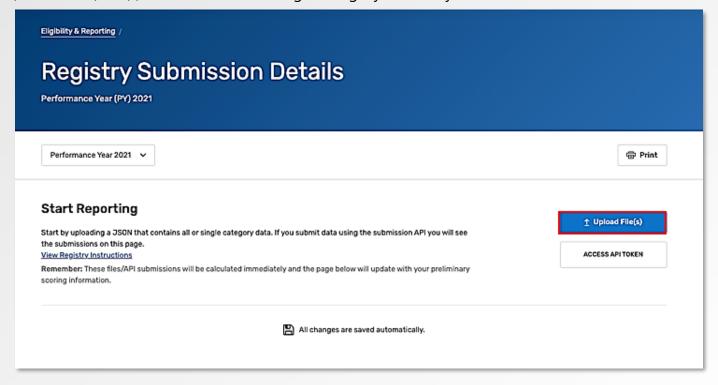
connecting to an organization.





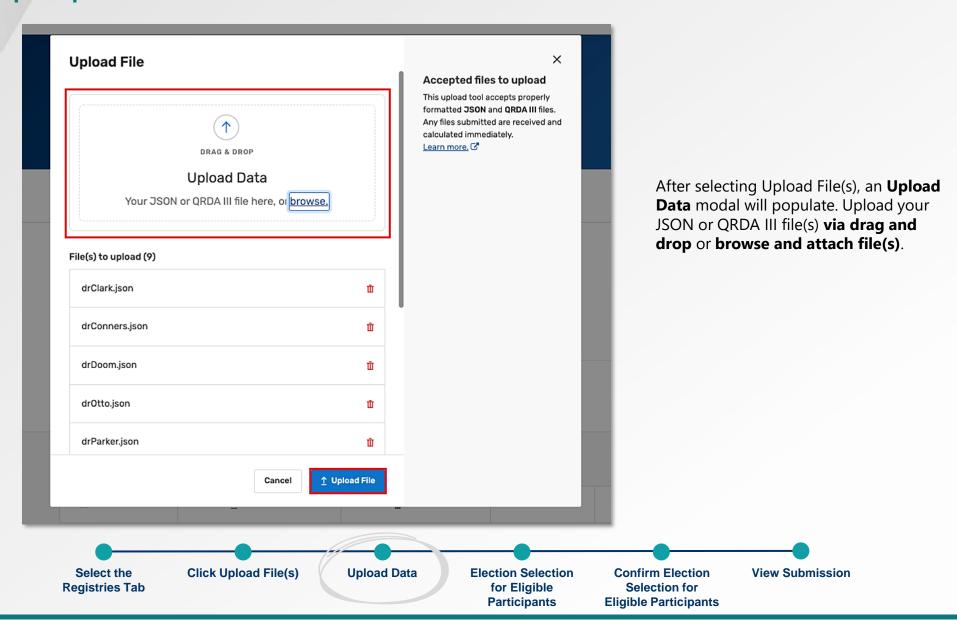
Step 2: Click Upload File(s)

Click Upload File(s) and upload a JavaScript Object Notation (QPP JSON) or Quality Reporting Document Architecture Extensible Markup Language (QRDA XML) file(s) that contain all or single category data for your clients.





Step 3: Upload Data



Step 4: Election Selection for Eligible Participants

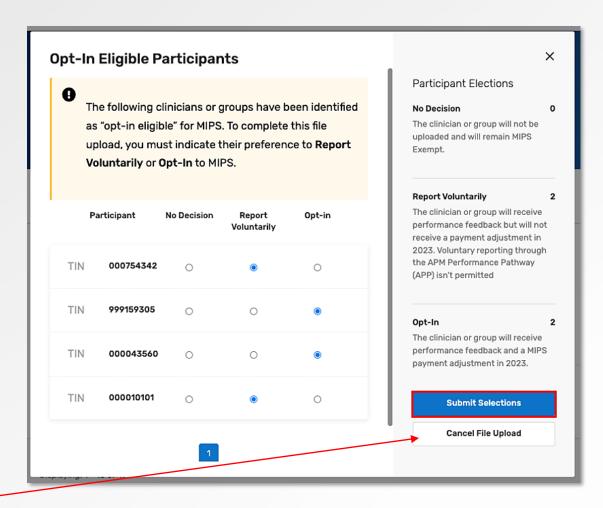
You'll see a list of all the opt-in eligible groups and clinicians included in the submission.

- Individual clinicians are identified by Taxpayer Identification Number and National Provider Identifier combination (TIN/NPI).
- **Groups** are identified by TIN.

You'll need to make an election for each TIN and TIN/NPI:

- No Decision: you don't want to continue with data upload for this participant (they will remain exempt unless an election is made later).
- Report Voluntarily: the clinician or group will not receive a payment adjustment based on data submitted.
- **Opt-In:** the clinician or group will receive a payment adjustment based on data submitted.

Once you complete your selection, click **Submit Elections.**



Change Your Mind? You can click Cancel File Upload, which will cancel the entire upload (including data for those who are already MIPS eligible). Once an election to opt-in or voluntarily report is confirmed that election can't be undone or changed.

Select the Registries Tab

Click Upload File(s)

Upload Data

Election Selection for Eligible Participants

Confirm Election Selection for Eligible Participants **View Submission**





Step 5: Confirm Election Selection for Eligible Participants

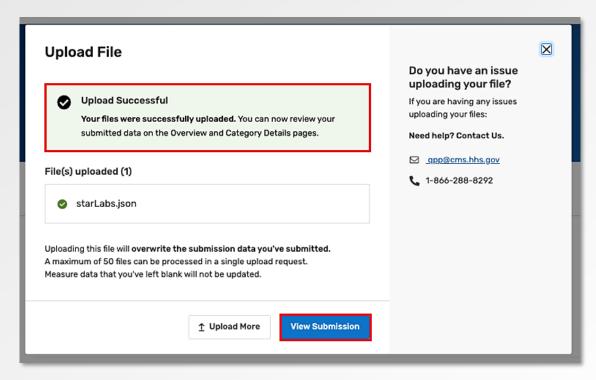
Next, you will be asked to verify your selection for eligible participants. When prompted to confirm your selection, type **CONFIRM** and click **I'm Sure, Confirm Elections**. Then, you will receive a **confirmation message** and option to **Continue Reporting** after you

click, I'm Sure, Confirm Elections. Are You Sure? × X **Participation Selections Confirmed** Your selected participants have been successfully opted-in to report for the 2021 performance year. Report Voluntarily 2 **Need to Change Your** The clinician or group will receive performance feedback Continue Reporting **Selections?** Click **Cancel** but will not receive a payment adjustment in 2023. and Go Back. Once an Voluntary reporting through the APM Performance ar 2021 🗸 Pathway (APP) isn't permitted. election to opt in or voluntarily report is confirmed, that election can't be undone or Opt-Ins 2 changed. The clinician or group will receive performance feedback and a MIPS payment adjustment in 2023. Please Type "CONFIRM" CONFIRM Cancel and Go Back I'm Sure. Confirm Elections Select the Click Upload File(s) **Upload Data Election Selection Confirm Election View Submission Registries Tab** for Eligible **Selection for Participants Eligible Participants**



Step 6: View Submission

After you click **Continue Reporting**, you'll receive confirmation that your file was successfully uploaded and can continue to view your submission data by clicking **View Submission** and will be brought to the **Registry Submission Details** page.



If you're file wasn't **successfully uploaded**, contact the QPP Service Center by email at qpp@cms.hhs.gov or phone at 1-866-288-8292 (TRS: 711), Monday through Friday, 8 am – 8 pm ET.







Help, Resources, and Version History

Where Can I Get Help?

Contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8 a.m.-8 p.m. Eastern Time or by e-mail at: QPP@cms.hhs.gov.

 Customers who are hearing impaired can dial 711 to be connected to a TRS
 Communications Assistant. Visit the Quality Payment
Program website for other help
and support information, to learn
more about MIPS, and to check
out the resources available in the
Quality Payment Program
Resource Library.



Help, Resources, and Version History



Version History

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

Date	Description
02/04/2022	Original Posting.

