Merit-based Incentive Payment System (MIPS)

2023 Opt-in and Voluntary Reporting Election Process Guide

Quality Payment
PROGRAM

Quality Payment
PROGRAM

Table of Contents

Purpose: This guide will cover the general information about opt-in elections, as well as the election process on the QPP website 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

How to Use This Guide

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.

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.

Hyperlinks

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

Quality Payment
PROGRAM

Overview

Getting Started

UPDATED 03/15/2024

As announced through the Quality Payment Program (QPP) listserv, the Centers for Medicare & Medicaid Services (CMS) **has extended** the data submission period for the Merit-based Incentive Payment System (MIPS) eligible clinicians who participated in the 2023 performance year. Data can be submitted and updated until **8 p.m. ET on April 15, 2024.**

Overview

Opt-In Eligible Clinicians and Groups

A clinician or group that is otherwise eligible for 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 2025.

    - You can opt-in to report traditional MIPS or the APM Performance Pathway (APP).

    - You **can't** opt-in to report a MIPS Value Pathway (MVP).

- **Elect to voluntarily report.** If you don't want to receive a MIPS payment adjustment in 2025, but want to participate in MIPS, you can voluntarily report data and receive limited performance feedback on the data you report.

    - You can voluntarily report traditional MIPS.

    - You **can't** voluntarily report a MIPS Value Pathway (MVP) or the APM Performance Pathway (APP).

NOTE:

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, groups, and APM entities that don't want to submit data **DON'T** have to make an election.

Overview

Opt-In Eligible Clinicians and Groups

A clinician or group that is otherwise eligible for 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 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**.

Virtual Groups: If a group is part of a virtual group and exceeds 1 or 2, but not all 3 low-volume threshold criteria (and is otherwise eligible to participate in a virtual group), the group is considered "opt-in eligible" and will be able to participate in MIPS as part of a virtual group. A virtual group election that includes the listing of such group confirms such group's election to opt-in and participate in MIPS as part of a virtual group.

NOTE:

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, groups, and APM entities that don't want to submit data **DON'T** have to make an election.

Overview

Quality Payment
PROGRAM

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

December 2023

- **Updated MIPS eligibility determinations for the 2023 performance period is released**, data is reconciled from the two 12-month segments of the MIPS Determination Period.
- **HOW DO I KNOW IF I'M ELIGIBLE?**
  - Check your final MIPS eligibility status for the 2023 performance period using the QPP Participation Status Tool.

January 2, 2024

- **2022 opt-in and voluntary reporting election period** and data submission period opens **January 2, 2024.**
- **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.

April 15, 2024

- **2022 opt-in and voluntary reporting election period** and data submission period ends on **April 15, 2024.**
- **WHEN DO I NEED TO ELECT TO OPT-IN OR REPORT VOLUNTARILY BY?**
  - If you're opt-in eligible and want to submit data, you must complete your opt-in or voluntary reporting election and submit your data by **April 15, 2024.**

Overview

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: ⊘ GROUP Opt-in Option: Opt-in eligible as group
If you're 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 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 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 APP as a group. The final score earned by the group through the APP would be applied only to those MIPS eligible clinicians who appear on a MIPS APM's Participation List or Affiliated Practitioner List on one or more snapshot dates. • Do nothing (you're not required to participate in MIPS as a group or make an election).

Overview

Opting-In vs. Voluntary Reporting

If you're opt-in eligible for the 2022 performance period **and** 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:
✓ Participants in a MIPS APM can choose whether to report the APP or traditional MIPS. ✗ You **can't opt-in to report** an MVP.	✓ Participants in a MIPS APM can voluntarily report via traditional MIPS. ✗ You **can't voluntarily report** the APP or an MVP.
✓ 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.
✓ 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 in the Doctors & Clinicians section of Medicare Care Compare.	✓ Your data will be made available for public reporting in the Doctors & Clinicians section of Medicare Care Compare. **Voluntary reporters** can choose to opt-out of having their data publicly reported during the Care Compare Preview period in late 2024.

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 the higher of the two final scores and associated payment adjustment.

Overfiew

Opting-in as a Group

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

- If a group opts-in to the APP, the final APP score earned by the group only applies to clinicians who appear on a MIPS APM's Participation List or Affiliated Practitioner List on one or more snapshot dates.

- Clinicians in the group that opted-in to the APP who are not MIPS APM participants will not receive a payment adjustment based on their group's APP performance; these clinicians will receive a traditional MIPS score. Final payment adjustment will be based on the highest available score or virtual group participation, if applicable.

Overview

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 2023 performance period.
- Check your final MIPS eligibility using the QPP 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 APP.

☑ **Have a HARP Account and QPP Role** to complete the election.
- Review the QPP Access User Guide (PDF) 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 QPP API.

- Elections can be made during the submission period (January 3, 2023, through March 31, 2023).
- Eligibility API documentation contains instructions on how to submit opt-in and voluntary reporting elections.
- Elections must be made before you can use the Submissions API to submit data on behalf of opt-in eligible clients.

Sign in to the QPP Website to Complete Your Election
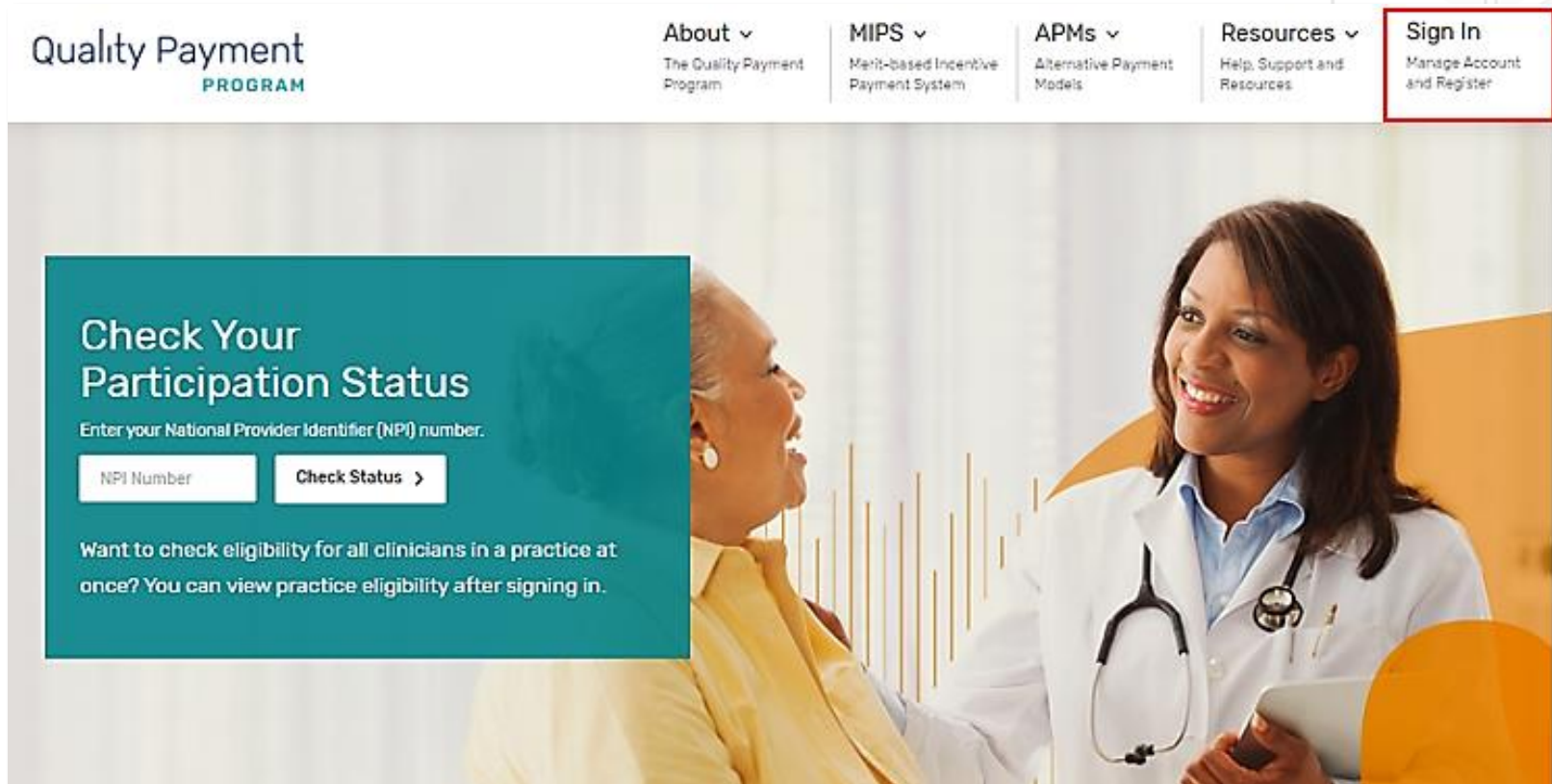
Sign in to the QPP Website to Complete Your Election

Navigate to the QPP Website

All users will navigate to the QPP website 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, 2023.

Sign in to the QPP Website to Complete Your Election

Sign in to your QPP Account

All users will navigate to the QPP website 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.

If you are a returning user and have a QPP Account:	If you're a new user and don't have a QPP Account:
Enter your **User ID** and **Password**. Then click **"Sign in."** Click "**Yes, I agree**" to the Statement of Truth prompt.	Click **Register for QPP** to establish your sign in credentials through the HCQIS Access Roles and Profile (HARP) system. To access HARP, click **Register with HARP.** Review the QPP Access Guide (ZIP) for information on the registration process.
QPP Account Sign in to QPP User ID [User ID] Password Show password [Password] **Forgot user ID or password** If you are a representative of a Shared Savings Program ACO and can access the ACO Management System (ACO-MS), then you can sign in to QPP using the same User ID and Password. [Sign in >] OR [Register for QPP]	**QPP Account** Sign in to QPP User ID [User ID] Password Show password [Password] **Forgot user ID or password** If you are a representative of a Shared Savings Program ACO and can access the ACO Management System (ACO-MS), then you can sign in to QPP using the same User ID and Password. [Sign in >] OR [Register for QPP]

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 on the left side navigation bar or click **Start Reporting** on the right side of the page.

Election Process

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

Quality Payment
PROGRAM

**Practice Representatives:
Election Process**

Practice Representatives: Election Process

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 QPP Access Guide (ZIP) for information on connecting to an organization.

Select the Practices Tab — Report as a Group or Individual Clinician — Group Reporting Options — Confirm Selection — Start Reporting

Practice Representatives: Election Process

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.

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.

Select the Practices Tab — Report as a Group or Individual Clinician — Group Reporting Options — Confirm Selection — Start Reporting

Practice Representatives: Election Process

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.

    - o **NOTE:** You can't voluntarily report the APP.

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

Group Reporting Options [X]

To participate in MIPS, you must decide whether you will **opt-in** or **report voluntarily** before any data can be submitted.

Dittrich, Krajíček and Urbanová
TIN: 166000093
⊘ MIPS EXEMPT

Elect to Opt-In

By electing to Opt-In, you become MIPS eligible. You will receive a MIPS final score and a payment adjustment

[Opt-In]

Choose to Report Voluntarily

By voluntarily reporting MIPS data, you will receive performance feedback for informational purposes only. You will not receive a payment adjustment . Voluntary reporting through the APM Performance Pathway (APP) isn't permitted.

[Report Voluntarily]

[Cancel and Go Back]

Select the Practices Tab — Report as a Group or Individual Clinician — Group Reporting Options — Confirm Selection — Start Reporting

Practice Representatives: Election Process

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 **Start Reporting**.

Change Your Mind?

If you change your mind on opting-in or reporting voluntarily, click **Change My Election** if you don't want to proceed. **Once an election to opt-in or voluntarily report is confirmed that election can't be undone or changed**.
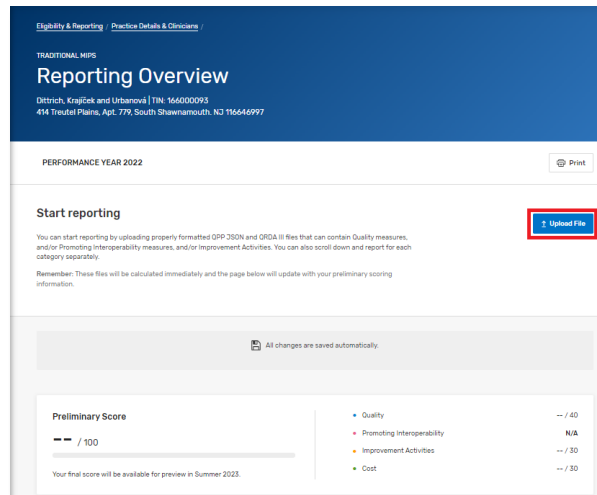
Select the Practices Tab — Report as a Group or Individual Clinician — Group Reporting Options — Confirm Selection — Start Reporting

Practice Representatives: Election Process

Step 5: Start Reporting

Reminder: The submission period is January 2, 2023 to March 31, 2023.

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 traditional MIPS or the APP. As a reminder you can't voluntarily report the APP.
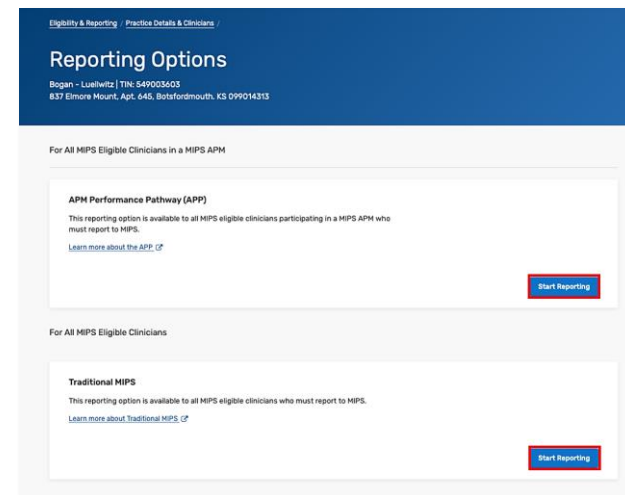

```
Select the Practices      Report as a Group or      Group Reporting      Confirm Selection      Start Reporting
Tab                       Individual Clinician      Options
```

Quality Payment
PROGRAM

Eligibility & Reporting Homepage

Eligibility & Reporting Homepage

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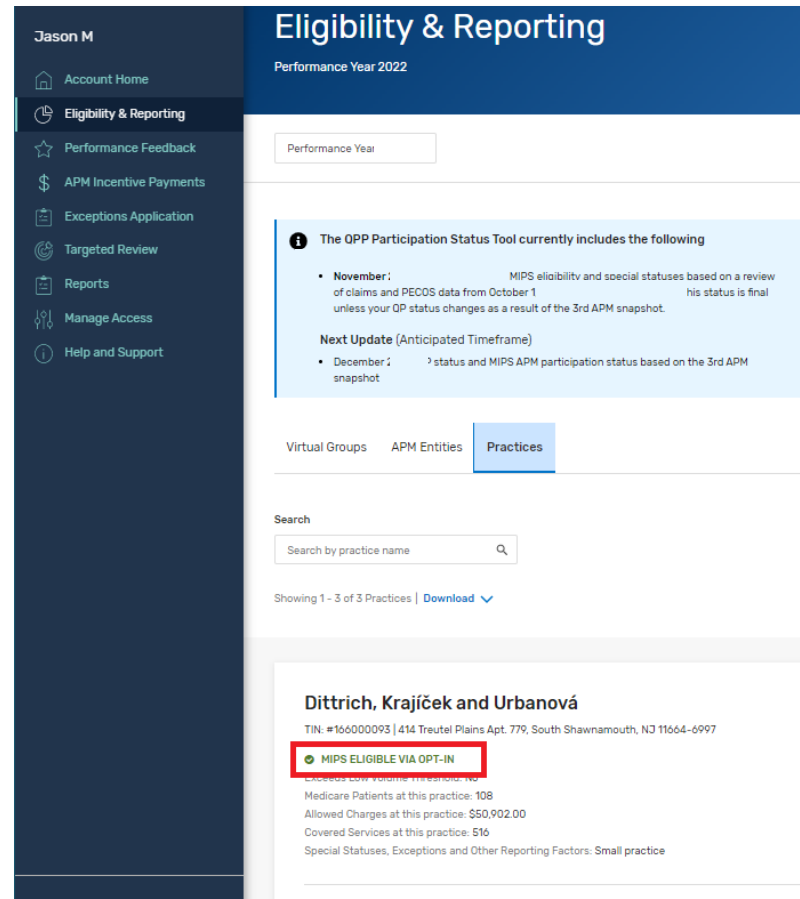
After completing an election to opt-in, you'll see an **updated eligibility status** on the **Eligibility & Reporting homepage.**

Quality Payment
PROGRAM

QCDRs and Qualified Registries: Election Process

QCDRs and Qualified Registries: Election Process

Quality Payment
PROGRAM

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 QPP Access Guide (ZIP) for information on connecting to an organization.

Select the Registries Tab — Click Upload File(s) — Upload Data — Election Selection for Eligible Participants — Confirm Election Selection for Eligible Participants — View Submission
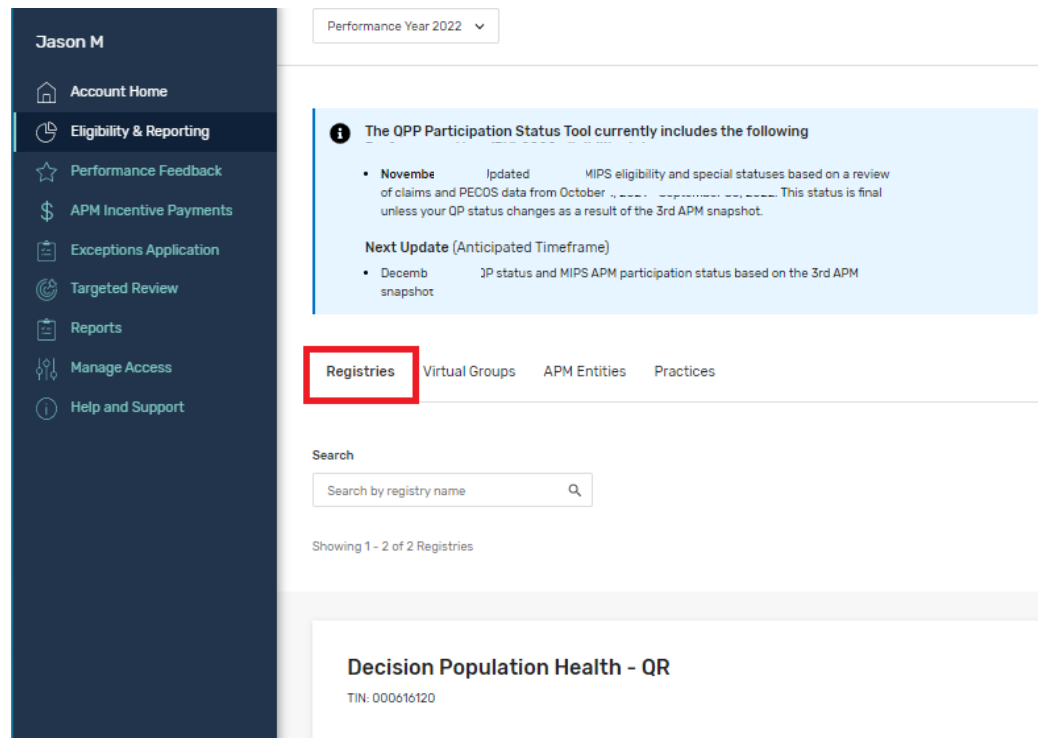
QCDRs and Qualified Registries: Election Process

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.

QCDRs and Qualified Registries: Election Process

Step 2: Upload Data
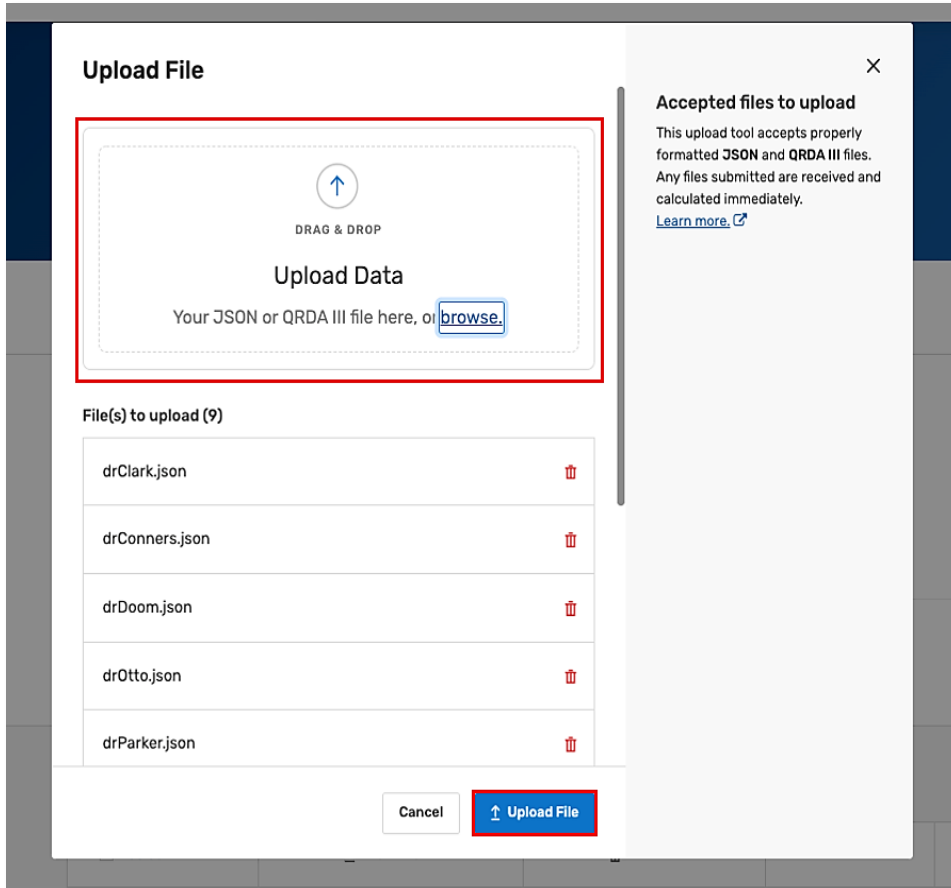
After selecting Upload File(s), an **Upload Data** modal will populate. Upload your JSON or QRDA III file(s) **via drag and drop** or **browse and attach file(s)**.

Select the Registries Tab — Click Upload File(s) — Upload Data — Election Selection for Eligible Participants — Confirm Election Selection for Eligible Participants — View Submission

QCDRs and Qualified Registries: Election Process

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.
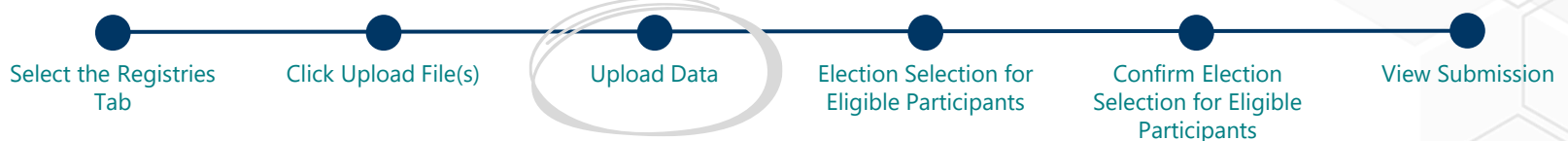
- **Opt-In:** the clinician or group will receive a payment adjustment based on data submitted.

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.

Opt-In Eligible Participants

The following clinicians or groups have been identified as "opt-in eligible" for MIPS. To complete this file upload, you must indicate their preference to **Report Voluntarily** or **Opt-In** to MIPS.

Participant		No Decision	Report Voluntarily	Opt-in
TIN	000754342	○	●	○
TIN	999159305	○	○	●
TIN	000043560	○	○	●
TIN	000010101	○	●	○

Participant Elections

No Decision — 0
The clinician or group will not be uploaded and will remain MIPS Exempt.

Report Voluntarily — 2
The clinician or group will receive performance feedback but will not receive a payment adjustment in ___. Voluntary reporting through the APM Performance Pathway (APP) isn't permitted

Opt-In — 2
The clinician or group will receive performance feedback and a MIPS payment adjustment in

Submit Selections

Cancel File Upload

Select the Registries Tab — Click Upload File(s) — Upload Data — Election Selection for Eligible Participants — Confirm Election Selection for Eligible Participants — View Submission

QCDRs and Qualified Registries: Election Process

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**.

Need to Change Your Selections? Click **Cancel and Go Back**. Once an election to opt in or voluntarily report is confirmed, that election can't be undone or changed.
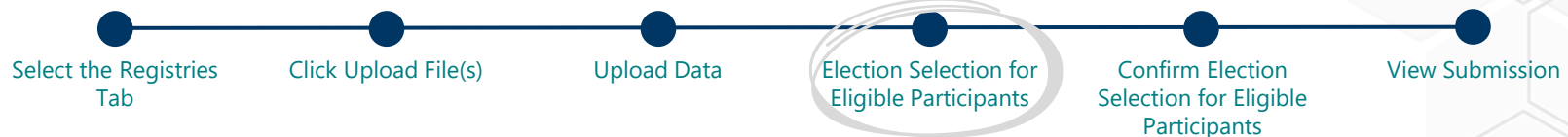

Are You Sure? ✕

Report Voluntarily   2

The clinician or group will receive performance feedback but will not receive a payment adjustment in Voluntary reporting through the APM Performance Pathway (APP) isn't permitted.

Opt-Ins   2

The clinician or group will receive performance feedback and a MIPS payment adjustment i...

Please Type "CONFIRM"

CONFIRM

Cancel and Go Back   I'm Sure, Confirm Elections

Participation Selections Confirmed ✕

Your selected participants have been successfully opted-in to report for the ___ performance year.

Continue Reporting

Select the Registries Tab — Click Upload File(s) — Upload Data — Election Selection for Eligible Participants — Confirm Election Selection for Eligible Participants — View Submission

QCDRs and Qualified Registries: Election Process

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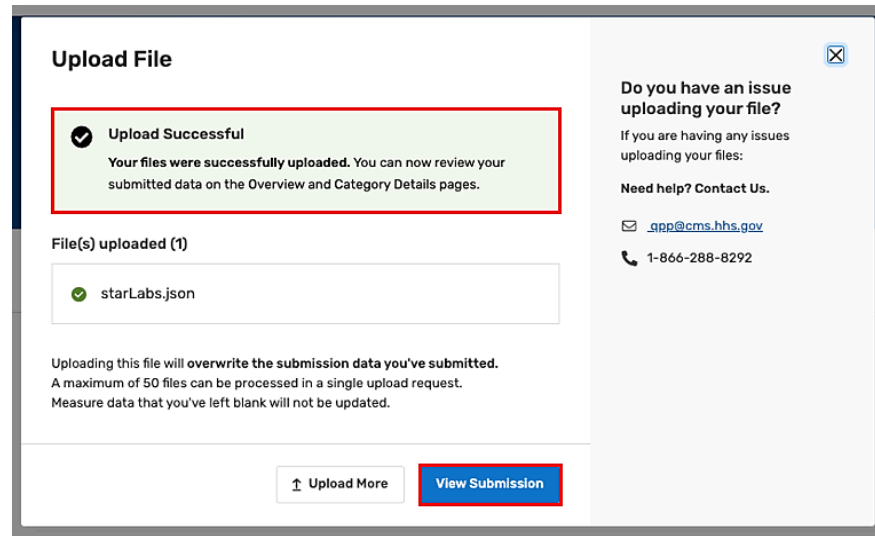
If you're file wasn't **successfully uploaded**, contact the QPP Service Center by email at qpp@cms.hhs.gov or phone at 1-866-288-8292 (TRS: 711), Monday through Friday, 8 a.m. - 8 p.m. ET.

Select the Registries Tab — Click Upload File(s) — Upload Data — Election Selection for Eligible Participants — Confirm Election Selection for Eligible Participants — View Submission

Quality Payment
PROGRAM

Help and Version History

Help and Version History

Where Can You Go for Help?

Contact the Quality Payment Program Service Center by email at QPP@cms.hhs.gov, create a QPP Service Center ticket, or by phone at 1-866-288-8292 (Monday through 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 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 and Version History

Quality Payment
PROGRAM

Version History

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

Date	Description
03/15/2024	Updated slides 6 and 9 to reflect the extension of the data submission period.
12/19/2023	Original Posting.