

## 2019 Merit-based Incentive Payment System (MIPS) Opt-In and Voluntary Reporting Election Process

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*CMS is implementing multiple flexibilities to provide relief to clinicians responding to the 2019 Novel Coronavirus (COVID 19) pandemic. Refer to the [Quality Payment Program COVID 19 Response Fact Sheet](#) for more information.*

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## Introduction

Beginning with the 2019 performance period, clinicians, groups and Alternative Payment Model (APM) Entities that exceed one or two, but not all three, elements of the low-volume threshold are “opt-in eligible” provided they are otherwise eligible for MIPS. **To participate in MIPS, they must make an election either to:**

- **Opt-in** (receive performance feedback and a positive, negative or neutral payment adjustment), or
- **Report voluntarily** (receive performance feedback but no payment adjustment)

Clinicians, groups and their third-party intermediaries can submit their election via [gpp.cms.gov](http://gpp.cms.gov) or the QPP eligibility Application Programming Interface (API) during the submission period: January 2 – March 31, 2020. While there is an alternate process for APM Entities to submit their election, the following policies apply to individuals, groups, and APM Entities:

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**Elections must be confirmed before data can be submitted.**  
**Once made, an election to opt-in or report voluntarily is final and cannot be reversed.**

## FAQs

### How will Clinicians and Groups Submit Their Election to Opt-In or Report Voluntarily?

Opt-in eligible clinicians and groups can **complete their own election (Opt-In or Report Voluntarily)** once the 2019 MIPS submission period opens on January 2, 2020 by signing in to [gpp.cms.gov](https://gpp.cms.gov).

- **Practice representatives** (practice staff, clinicians and third parties) authorized by the Security Official to view or submit data for the practice<sup>1</sup> on [gpp.cms.gov](https://gpp.cms.gov) can:
  - Make an election on behalf of the practice (to report as a group), and/or
  - Make an election on behalf of individual clinicians (to report as individuals)

If your practice is participating as a group, you do not need to make an election for individual clinicians unless they are also submitting individual data.

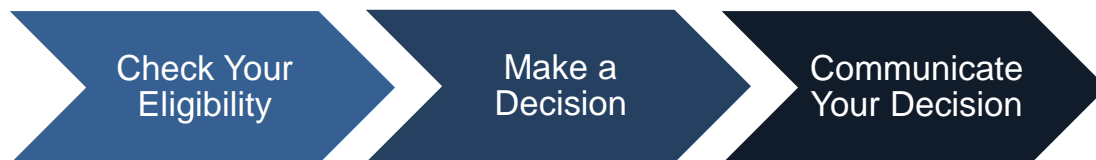
**Qualified Registries and QCDRs** with their own QPP accounts and access can also submit elections on behalf of opt-in eligible clinicians and groups. [Learn more](#).

Once you make your election, you will be asked to confirm the election and will be reminded that, once made, **this election cannot be changed**.

### What Can Clinicians and Groups Do Between Now and January 2, 2020?

If you are opt-in eligible and do not intend to submit data to MIPS, you don't need to do anything.

If you do intend to submit data to MIPS, you can't make your election until the submission period opens on January 2, 2020, but you can do the following in preparation:



<sup>1</sup> Practice representatives should review **Register for a HARP Account** and **Connect to an Organization** in the [QPP Access User Guide](#).

### ✓ **Check Your Eligibility.**

We have updated eligibility information on the [QPP Participation Status Lookup Tool](#) after analyzing claims data from the second 12-month segment (10/1/18 – 9/30/19) of the [MIPS Determination Period](#). Unless you are identified as an APM participant in the 3<sup>rd</sup> snapshot (or 4<sup>th</sup> snapshot for the Shared Savings Program), your eligibility is final.<sup>2</sup>

If you are <b>eligible as an individual</b> , you must participate in MIPS	If you are <b>opt-in eligible as an individual</b> , you can: <ul style="list-style-type: none"><li>• Elect to opt-in as an individual,</li><li>• Elect to voluntarily report as an individual, or</li><li>• Do nothing (you are not required to participate)</li></ul>	If you are <b>exempt as an individual</b> , you can: <ul style="list-style-type: none"><li>• Voluntarily submit data to MIPS as an individual (no election required), or</li><li>• Do nothing (you are not required to participate)</li></ul>
If you are <b>eligible as a group</b> , you: <ul style="list-style-type: none"><li>• Can choose to report data as a group, or</li><li>• Do nothing (there is no requirement to participate as a group)</li></ul>	If you are <b>opt-in eligible as a group</b> , you can: <ul style="list-style-type: none"><li>• Elect to opt-in as a group,</li><li>• Elect to voluntarily report as a group, or</li><li>• Do nothing (there is no requirement to participate as a group)</li></ul>	If you are <b>exempt as a group</b> , you can: <ul style="list-style-type: none"><li>• Voluntarily submit data to MIPS as a group (no election required), or</li><li>• Do nothing (there is no requirement to participate as a group)</li></ul>

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<sup>2</sup> If you are identified as a Qualifying APM Participant (QP) in the 3<sup>rd</sup> snapshot, you will be exempt from MIPS. If you are identified as a MIPS APM Participant in the 3<sup>rd</sup> (or 4<sup>th</sup>) snapshot and do not have QP status, you will be scored under the APM Scoring Standard and your APM participation will override your individual eligibility and any election you may make.



### ✓ ***Make a Decision.***

If you are **opt-in eligible** and want to submit data for MIPS, you will need to decide if you want to:

- **Opt-in to MIPS** and receive a payment adjustment (which could be positive, negative or neutral), or
- **Report Voluntarily** and receive performance feedback but no payment adjustment.

### ✓ ***Communicate Your Decision.***

If you want to submit data but will not be submitting your own data directly, you will need to communicate your opt-in or voluntary reporting decision to the person who will be submitting data on your behalf.

- This could include practice staff or third-party intermediaries such as a Qualified Registry or Qualified Clinical Data Registry (QCDR).

If you are working with a Qualified Registry or QCDR to submit data on your behalf and are reporting:

- **As a group**, please include the group's Taxpayer Identification Number (TIN), along with your election.
- **As an individual**, please include the group's Taxpayer Identification Number and your National Provider Identifier (TIN/NPI combination), along with your election.

#### **Helpful Hints:**

- Subscribe to the QPP listserv at the bottom of the [Quality Payment Program website](#) for program announcements via email, like the release of updated eligibility information based on APM participation in the 3<sup>rd</sup> (or 4<sup>th</sup>) snapshot
- Work with your vendor to determine the best way to communicate this information for the clinicians in your practice
- If you haven't already identified a vendor, review the [2019 QCDR Qualified Postings](#) and [2019 Qualified Registry Qualified Postings](#)

## How Will APM Entities Submit Their Election to Opt-In?

Opt-in eligible APM Entities will need to submit their opt-in election before they can participate in MIPS. On September 30<sup>th</sup>, we sent opt-in election notifications to APM Entities that have been identified as currently opt-in eligible. (A second round of notifications will be sent in December to APM Entities who are newly identified as opt-in eligible following the next eligibility analysis.)

Please review the **APM Entity Opt-In Process and Policies** document in the 2019 Opt-In and Voluntary Reporting Election Toolkit for more information about the opt-in policy and election process for APM Entities.

## How Will a Qualified Registry or QCDR Submit an Election on Behalf of Clinicians and Groups?

Third party intermediaries with their own [QPP access and accounts](#), such as Qualified Registries and Qualified Clinical Data Registries (QCDRs), can also complete elections on behalf of their clients when submitting their data once the submission period opens on January 2, 2020.

### ✓ *Via File Upload.*

Sign in to [qpp.cms.gov](https://qpp.cms.gov), navigate to your reporting dashboard and upload a file as usual. If any of the TINs and/or TIN/NPIs in the submission are opt-in eligible, you will have to complete their elections before completing the submission.

For each TIN and TIN/NPI displayed, you will need to make a selection:

- **No Decision** (the clinician or group's data will be removed from the upload; you can submit their election later)
- **Report Voluntarily** (clinician or group will receive performance feedback but no 2021 payment adjustment)
- **Opt-In** (clinician or group will receive both performance feedback a 2021 payment adjustment)


You will be asked to confirm the elections and will be reminded that these elections, once made, cannot be changed.

You will not be able to complete your file upload until you've made a selection for each opt-in eligible TIN and TIN/NPI.

### ✓ *Via the Eligibility API.*

Third-party intermediaries that use QPP APIs instead of file uploads can submit elections on behalf of their clients using a new Opt-In endpoint within the [QPP Eligibility API](#). Elections must be received before you can use the [QPP Submissions API](#) to submit any data on behalf of your opt-in eligible clients. Please note that once you transmit a clinician or group's election to opt-in to MIPS, this election **cannot be changed**. They will receive a final score and 2021 MIPS payment adjustment, even if no data is submitted on their behalf.

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More information will be available by early November in the [Eligibility API documentation](#) in the [Developer Tools](#) on the [Quality Payment Program website](#).

## What Can QCDRs and Qualified Registries Do Between Now and January 2, 2020?

Opt-in elections cannot be made until the submission period opens on January 2, 2020, but you can do the following in preparation:

### ✓ **Collect Opt-In Election Decisions from Your Clients.**

We have updated eligibility information on the [QPP Participation Status Lookup Tool](#) after analyzing claims data from the second 12-month segment (10/1/18 – 9/30/19) of the [MIPS Determination Period](#).

Now that this updated information is available, you will need to know whether your opt-in eligible clinicians and groups want to opt-in to MIPS or voluntarily report for the 2019 performance period. You will not be able to submit data on their behalf until you have submitted their election.

**REMINDER:** It is your responsibility to know the eligibility status of all the clinicians working with your organization.

- If they elect to **opt-in**, they will receive performance feedback and a MIPS payment adjustment even if no data is submitted.
- If they elect to **voluntarily report**, they will receive performance feedback but no payment adjustment.

### Helpful Hints:

- Determine the process that works best for your organization to collect and track your clients' eligibility
- Double check the opt-in decisions associated with each opt-in eligible TIN and TIN/NPI
- Join or Monitor the [Developer Google Group](#)
- Attend your monthly support call
- Subscribe to the QPP listserv at the bottom of the [Quality Payment Program website](#) for email updates and more information

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## Additional Resources

- Opt-In and Voluntary Reporting Election User Guide (included in the 2019 Opt-In and Voluntary Reporting Election Toolkit)
- APM Entity Opt-In Process and Policies (included in the 2019 Opt-In and Voluntary Reporting Election Toolkit)
- [2019 MIPS Opt-In and Voluntary Reporting Fact Sheet](#)
- [Quality Payment Program Website:](#)
  - [QPP Participation Status Lookup Tool](#)
  - [Reporting Options Overview](#)
  - [How MIPS Eligibility is Determined](#)

## Version History

Date	Change Description
5/19/2020	Added disclaimer language regarding changes to 2019 MIPS in response to COVID-19
12/5/2019	Updated to reflect that updated MIPS eligibility is available from the 2 <sup>nd</sup> segment. It's also final for those not identified as an APM Participant in the 3 <sup>rd</sup> (or 4 <sup>th</sup> ) snapshot. <a href="#">Learn more</a>
11/7/2019	Original posting

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