CMS ANNOUNCES NEW MIPS PARTICIPATION OPTIONS FOR 2017

On September 8, CMS's Acting Administrator Andy Slavitt announced new options in how MIPS eligible clinicians may participate in MIPS for 2017. In doing so, Mr. Slavitt also stated that CMS will publish the final rule for MIPS, APM incentive payments, etc. no later than November 1, 2016.

Mr. Slavitt's announcement provided only a summary of these new options. The final rule will more fully explain the options and how they will be implemented. As summarized by Mr. Slavitt, the new options for 2017 are as follows.

Option #1: As long as a MIPS eligible clinician submits "some" data under MIPS including data from after January 1, 2017, the clinician will avoid a negative payment adjustment in 2019. It is not clear whether "some" performance data under each of the four MIPS performance categories must be reported.

Option #2: A MIPS eligible clinician (or a practice as a group) may choose to submit data for a reduced number of days during 2017. A clinician's first performance period could begin later than January 1, 2017, and the clinician (or the clinician's practice) could still qualify for a small positive payment adjustment. For example, if a MIPS eligible clinician submits data for part of 2017 on the quality, advancing care information and clinical practice improvement activity MIPS performance categories, the clinician (or the clinician's practice) could qualify for a "small" positive payment adjustment for 2019. Mr. Slavitt's announcement did not indicate what a "small" positive payment adjustment would be.

Option #3: A MIPS eligible clinician (and the clinician's practice) may choose to submit MIPS performance data for the entirety of 2017. If a MIPS eligible clinician submits information for the entire year on the quality, advancing care information and clinical practice improvement activity MIPS performance categories, the clinician (or the clinician's practice) could qualify for a "modest" positive payment adjustment. Mr. Slavitt's announcement did not indicate what a "modest" positive payment adjustment would be.

Option #4: If a MIPS eligible clinician participates in an Advanced Alternative Payment Model (such as Medicare Shared Savings Track 2 or 3) in 2017, and if the clinician receives enough of his/her Medicare payments or sees enough of his/her Medicare patients through the Advanced Alternative Payment Model in 2017, then the clinician would qualify for a 5 percent incentive payment in 2019.

From Mr. Slavitt's announcement, it is not clear how these new participation options will affect the calculation of MIPS composite performance scores. A copy of Mr. Slavitt's announcement may be found here.

If you have any questions, please contact Tim Kennedy at (317) 977-1436 or tkennedy@hallrender.com.

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