

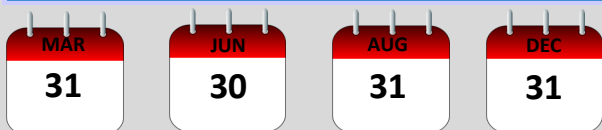


MIPS Alternative Payment Models

Full Participation Requirements for MIPS APM Eligible CRNAs:

MIPS APMs are a subset of APMs that utilize a special scoring standard to determine a group practice's MIPS composite performance score. The scoring standard is designed to account for activities that are already required by the APM which eliminates the need for MIPS clinicians to submit performance data multiple times. CRNAs with a signed MIPS APM Participation Agreement will have their MIPS performance data submitted on their behalf as required by the terms set forth by the APM Entity's agreement with CMS. Performance will be assessed using the MIPS APM scoring standard for their final composite performance score. CRNAs who are in an Advanced APM who do not qualify as a full Qualified Participant (QP), but do qualify as a Partial QP may still **choose** to participate as a MIPS APM participant using the special APM scoring standard to determine their MIPS composite performance score. A CRNA who does not qualify as a Partial QP, or who is not on the Participation List on one of the snapshot dates (below), will not have the special APM scoring standard apply and he or she **must** report performance data according to regular MIPS reporting requirements to avoid the penalty. For more information on Advanced APMs, QP and partial QPs please reference the **Advanced APM Fact Sheet**.

Participation Determinations—Snapshot Dates



CMS will take four "snapshots" during the performance period to determine which eligible clinicians (ECs) are on a MIPS APM's Participation List. CMS added a fourth "snapshot" date of December 31 that applies only to ECs in *Medicare Shared Savings* ACOs to determine which ECs joined the ACO between September 1st and December 31st of the performance year. This was done so that they can benefit from the APM scoring standard. The December 31st date will **not** be used to make QP determinations. If an eligible clinician is not on the Participation List on one of these dates, the APM scoring standard will not apply.

2018 MIPS APMS

Next Generation ACO*
BPCI Advanced (goes live October 1, 2018)
Medicare Shared Savings Program Tracks 1, 2*, 3* and 1 Plus*
Medicare-Medicaid ACO (MMACO) Tracks 1,2* and 3*
Comprehensive End Stage Renal Disease Model (LDOs and non-LDOs 1 sided and 2* sided risk)
Comprehensive Primary Care Plus (CPC+) **
Oncology Care Model (OCM) (1 and 2* sided risk)
Vermont Medicare ACO Initiative* (part of Vermont All-Payer ACO model)***

*Advanced APM depends on QP or partial QP status;
 ** Participants in both CPC+ and Medicare Shared Savings Program (MSSP) ACOs will have their APM status determined by MSSP. For practices that start CPC+ in 2018 with 50+ eligible clinicians in parent organization, will not be considered as part of an Advanced APM.
 *** Vermont ACOs will participate as a Advanced APM and MIPS APM in 2018 as a version of a Next Generation ACO.

MIPS APM Scoring Standard Criteria

1. APM Entities participate in the APM under an agreement with CMS;
2. APM requires that APM Entities include at least one MIPS clinician on a Participation List; and
3. APM bases performance payment incentives on cost/utilization and quality measures.

2018 MIPS APM Scoring

Generally, most eligible clinicians (ECs) participating in MIPS APMs will have their performance categories weighted in the following manner: Quality=50%; Improvement Activities=20%; Advancing Care Information=30%; and Cost=0%. ECs in MIPS APMs that are not required to report Quality measures, also referred to Other APMs (i.e. CPC+, the Comprehensive ESRD Model and the Oncology Care Model) will have their the remaining performance categories reweighted as: Improvement Activities=25%; Advancing Care Information=75%; Quality=0%; and Cost=0%. Other examples of performance category reweighting that are more complex will be addressed in the APM FAQs. ECs in MIPS APMs will be scored at the APM Entity Group level and each EC will receive the APM Entity Group's final score. In addition, the MIPS payment adjustment will be applied at the TIN/NPI level for each EC in the MIPS APM.



Quality



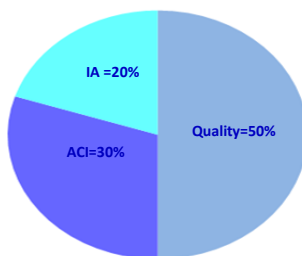
Improvement Activities (IA)



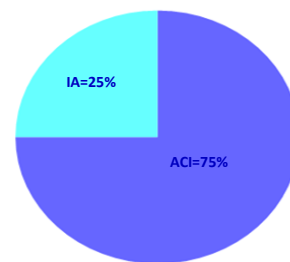
Advancing Care Information (ACI Optional for CRNAs)



Cost



General MIPS APMS Scoring Standard
 In all MIPS APMs, the Cost performance category will not be assessed under the APM scoring standard.



MIPS APMS not Reporting Quality Measures (a.k.a Other APMs) Eligible clinicians in a MIPS APM that are not required to report Quality measures will have their performance categories reweighted. In addition, the Cost performance category is not assessed under the APM scoring standard.

