I’m Kara Gainer, APTA’s director of regulatory affairs.

- As if MIPS and APMs aren’t enough to learn about in the Quality Payment Program, there is a type of APM called a “MIPS APM.” Essentially, it is for MIPS-eligible clinicians participating in alternative payment models who don’t qualify for the incentives offered within Advanced APMs.
- Under the Quality Payment Program, all clinicians who are eligible to be in MIPS—the Merit-based Incentive Payment System—must participate in the program, unless they are determined to be qualified participants in an Advanced Alternative Payment Model, or Advanced APM.
- CMS determines whether a clinician meets annual thresholds to be either a Qualifying Participant, called a QP, or a Partial QP in an Advanced APM. QPs are not permitted to participate in MIPS, while Partial QPs can choose whether or not to report to MIPS.
- This still leaves some clinicians in Advanced APMs who do not meet the thresholds to be QPs or Partial QPs, and other potentially eligible clinicians who are in APMs that do not qualify as Advanced APMs. These clinicians fall into a subset of APMs called MIPS APMs.
- To determine participation in a MIPS APM, an eligible clinician must be included on the MIPS APM’s Participation List on at least 1 of 4 snapshot dates – March 31, June 30, August 31, or December 31.
- While clinicians in MIPS APMs are not eligible for the annual Advanced APM 5% lump-sum bonus payment, they may qualify for MIPS payment bonuses and exceptional-performance adjustments. CMS will calculate a final score for the APM Entity, based on performance under 3 MIPS categories: quality, clinical improvement activities, and advancing care information.
- Although physical therapists are not currently MIPS-eligible clinicians, it is important to be aware of this type of APM, because physical therapists could be required to participate in MIPS in the future.
- CMS will establish an APM participant database of MIPS APMs and Advanced APMs, which will include all the MIPS-eligible clinicians who are part of the APM Entity.

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