



Understanding Your 2019 MIPS Reporting Options

Reporting Options for Pathologists	Qualified Clinical Data Registry (QCDR)	Qualified Registry (QR)	Medicare Part B Claims-Based Reporting	QPP Data Submission System
Features/Capabilities				
Definition	A Centers for Medicare & Medicaid Services (CMS)-approved QCDR is an entity that collects clinical data from MIPS eligible clinicians (both individual and groups) and submits it to CMS on their behalf for purposes of MIPS. ¹	A qualified registry is a CMS-approved entity that collects clinical data from MIPS eligible clinicians (both individual and groups) and submits it to CMS on their behalf for purposes of MIPS. ¹	Medicare Part B claims measures can only be submitted by clinicians in a small practice (15 or fewer eligible clinicians), whether participating individually or as a group.	Individual clinicians and groups can log in and attest or log in and upload (in an approved file format) their data on qpp.cms.gov.
MIPS Quality Payment Measures – Pathology Specific	✓	✓	✓ Note: If you report quality by claims and your claim is denied, your MIPS reporting for that claim also fail	✗ Quality measure data cannot be submitted via the QPP Submission System ²
Additional pathology-specific QCDR measures available for MIPS reporting	✓	✗	✗	✗
Patient Applicability for MIPS Reporting	✓ All applicable patients across all payers	✓ All applicable patients across all payers	! Medicare Part B patients only	✗
Quarterly Benchmarking for Performance Improvement	✓	✓	! CMS may provide via QPP Submission System	✗
Eligible Measure Applicability (EMA) Process for Quality Category ³	✗ EMA does not apply to QCDR submission	✓	✓	✗
Supports All MIPS Reporting Options ⁴	✓	✓	! Small practices only	✓ Improvement Activities and Promoting Interoperability only
Supports reporting for all MIPS categories applicable to pathologists	✓	✓ Registry-specific ⁵	✗ Quality Payment Measures only	✗ Improvement Activities and Promoting Interoperability only
MIPS Reporting Recommendations	✓ Registry-specific ⁵	✓ Registry-specific ⁵	! CMS Help Desk	! CMS Help Desk
MIPS Composite Score Estimation	✓ Registry-specific ⁵	✓ Registry-specific ⁵	! CMS may provide via QPP Submission System	! CMS may provide via QPP Submission System

1. Merit-Based Incentive Payment System (MIPS): 2019 CMS-Approved Qualified Clinical Data Registries (QCDRs); 2019 CMS-Approved Qualified Registries

2. The QPP Submission System and CMS Web Interface are accessed through the same Web Portal, but serve two purposes. The QPP Submission System is defined above and the CMS Web Interface is a reporting option or mechanism only available to registered groups of 25+ eligible clinicians.

3. Eligible Measure Applicability (EMA) process: The EMA methodology replaces the Physician Quality Reporting System (PQRS) measure applicability validation (MAV) process. CMS will apply the EMA methodology to determine the number of measures a physician should have reported on when they reported on less than the required six quality measures in the quality category of MIPS.

4. There are two reporting options for MIPS based on TIN/NPI combination – individual and group reporting, as well as a new reporting option for 2019, opt-in. The decision to report as an individual, group, or to opt-in is part of your MIPS strategy and will be unique to your practice. Starting in 2019, you can participate as an individual and as a group, and CMS will use the highest scoring submission for the MIPS final score.

5. The Pathologists Quality Registry provides these services. Such services are optional and may not be provided by every registry.