Partial Qualified Participants (QP) Status

Clinicians who do not meet the threshold to become a QP but meet a slightly lower threshold of advanced alternative payment model (APM) participation are deemed partial QPs. Partial QPs do not receive the APM incentives but are exempt from the Merit-based Incentive Payment System (MIPS), though they may choose to report and receive MIPS payment adjustments voluntarily. In 2017, clinicians in an advanced APM must meet or exceed either 20 percent of Medicare payments or 10 percent of Medicare patients to be exempt from 2017 MIPS reporting and potential payment adjustments in 2019.

APM entities and clinicians will know their QP or partial QP status before the MIPS election period; CMS anticipates announcing 2017 determinations before Dec. 31, 2017. APM entities or clinicians that are determined to have partial QP status may elect to participate in MIPS. As a default, CMS will assume non-participation in MIPS unless then APM entity or clinician opts in by submitting data under MIPS. Additional details regarding MIPS reporting can be found here.

Partial QPs who participate in certain advanced APMs and opt into MIPS will receive favorable scoring under the MIPS. For 2017, those advanced APMs receiving favorable MIPS scoring are Tracks 2 and 3 of the Medicare Shared Savings Program and the Next Generation Accountable Care Organization program. More information about this favorable scoring under MIPS is available here.