

Changes to 2023 Data Submission Experience

Background

For the last several years, we've provided clinicians and their representatives with preliminary scoring information during the submission period and preliminary feedback. This has meant seeing an overall preliminary score as well as preliminary, weighted category-level scores. While we recognize that this has provided some measure of comfort in understanding how you're progressing towards the performance threshold, it's important to remember that the preliminary scoring information you've seen in prior years during submission and preliminary feedback has never been your final score and shouldn't be interpreted that way. Final scores have always differed from the preliminary scoring available during submission and preliminary feedback.

Changes to Preliminary Scores

As the MIPS program has matured and expanded, the reliability of these preliminary scores has decreased. Preliminary scores have always been subject to change, as new data is calculated and added to your profile following the submission period. This data includes:

- Administrative claims quality measures.
 - There are now 4 available in traditional MIPS, which means that up to 40 additional points could be available in the quality category.
 - There are 2 administrative claims measures scored under the APM Performance Pathway.
 - There's 1 population health measure calculated for every MVP participant, and the potential to be scored on an additional outcomes-based administrative claims measure if selected during registration for applicable MVPs.
- Administrative claims cost measures.
 - There are 25 available for the 2023 performance period.
- CAHPS for MIPS Survey measure.
- Complex patient bonus.
 - Up to 10 points added to your final score.
- Improvement scoring for cost and quality.
- Performance period benchmarks for quality measures.
 - These calculations can shift the measures you're scored on (when submitting more than the required number).



- Reweighting the cost category.
 - Although cost measures aren't evaluated until after the submission period, preliminary scores and weights for the other performance categories have assumed that you will be scored on cost.
 - Scores shift dramatically if the 30% weight for the cost performance category is redistributed to another performance category (or categories) because you can't be scored on any cost measures.

Beginning in 2023, clinicians may also have different data sets reported for up to 3 MIPS reporting options: traditional MIPS, MIPS Value Pathways (MVPs), and the APM Performance Pathway (APP).

The increasing volume of scoring information that can change after the submission period has made this information too unreliable. As a result, we're eliminating the Preliminary Score and preliminary category level scores from submission beginning with data submission for the 2023 performance year. We wanted to introduce this change in a year where there's stability with the performance threshold; the performance threshold for the 2023 performance year is 75 points, just as it was in the 2022 performance year. In the CY 2024 Medicare Physician Fee Schedule Notice of Proposed Rule Making, we proposed to increase the performance threshold to 82 points for the 2024 performance year.

What Should We Expect During Submission?

When you sign into the QPP website during the submission period, you'll continue to see much of the same information you've always seen:

- Measure-level scores for the quality measures you've submitted to date, and a sub-total of points earned for these measures.
- Activity-level scores for the improvement activities you've submitted to date, and a sub-total of points earned for these activities.
- Measure-level scores for the Promoting Interoperability measures you've submitted to date, and a sub-total of points earned for these measures.
- The number of objectives you've reported completely for the Promoting Interoperability performance category.
- An indicator of any performance categories that will be reweighted (if applicable).

We'll also provide you with information to help you understand how the information you see during submission informs final scoring.

When Will Our 2023 Final Score Be Available?

You'll be able to preview your 2023 final score in mid-June 2024 and view your 2025 MIPS payment adjustment information in mid-August 2024. This is the same timeline as the 2021 and 2022 performance years.



We recognize this is a big shift, but any preliminary scoring information has always been for informational purposes and has always been subject to change. We want to help clinicians and practice representatives avoid making an incorrect assumption about their final score given the volume of scoring information that's applied following the submission period.

Version History

Date	Change Description
8/31/23	Original version