



2019 MIPS Solo Practitioner & Small Practice Survival Guide

Purpose of this guide. To give solo practitioners and small practices with limited administrative support a short, step-by-step guide to surviving 2019 MIPS. Follow these steps early in the performance year. *For greatest ease and success of participation, follow these steps by April of the performance year.*

What is MIPS? MIPS is Medicare's Merit Based Incentive Payment System. Under this program, physicians must meet quality reporting requirements annually in order to avoid penalties in future years.

STEP 1. Will You Be Practicing When the Penalties for 2019 are Levied in 2021?

- If the answer is a *definite* "No"
 - You do not need to report MIPS in 2019, and can stop here.
- If the answer is "Yes" or "Maybe"
 - If you don't successfully report MIPS in 2019, you will be subject to a 7% penalty in 2021. This translates into an average penalty amount of \$28,121 for an average ophthalmologist.
 - Continue Reading.

STEP 2. Are You or Your Group Required to Report to MIPS?

The clinician qualifies for an automatic exemption from MIPS if they meet one or more of the following:

1. Less than or equal to \$90,000 in Medicare Part B service allowed charges, and/or
2. Provides covered professional services to 200 or fewer Medicare Part B patients, and/or
3. (New in 2019) Provides 200 or fewer covered professional services to Part B patients.
 - a. Since if you treat more than 200 patients you, by definition, performing at least 200 services, this threshold will not increase the number of exempt clinicians.

These criteria must be met *either* of the following time periods in order to qualify for a MIPS exemption:

1. Oct 1, 2017 – Sept 30, 2018 + 30-day claims run out, and/or
2. Oct 1, 2018 - Sept 30, 2019.

You verify your status online using the CMS MIPS Eligibility Look Up Tool (look under 2019 tab):

<https://qpp.cms.gov/participation-lookup>

Note: If the clinician is reporting as a part of a group, the threshold is evaluated at the group level.

STEP 3. Appoint One Person to Be Responsible for MIPS Reporting.

This person could be you or an office administrator, but should be responsible, detail-oriented, proactive, and patient. Regardless of who you appoint, you should oversee the MIPS reporting for your practice because CMS ultimately holds you responsible for the results.

When you select your office's "MIPS person," please do the following:

- Inform any staff who answers the phones who the MIPS person is so that IRIS® Registry staff and the IRIS Registry vendor staff can contact that person to address any issues or answer questions.
- Appoint a backup in case your primary leaves your practice or is unavailable for any reason.
- Direct both the primary and secondary MIPS person to read the Academy's [Small Practice Roadmap](#) so that they have a good base of information and knowledge of available resources.

STEP 4. Define Your Goal: Do You Want to Avoid the Penalty or Try for a Bonus?

- Penalty avoidance
 - Pros: Avoiding a penalty is relatively easy and will not take a substantial amount of time for your practice. This will result in a significant return on the small investment of time.
 - Cons: You will not earn any bonus and won't be prepared to do more for future years.
- Try for a bonus
 - Pros: You could earn a potential small bonus. If you spend the time investing in learning and practicing reporting more this year, this will reduce the learning curve and prepare you for future years of the program when it is more difficult to avoid the penalty.
 - Cons: Earning a bonus is more time intensive, and bonuses are not expected to be large.

STEP 5. Sign Up for the IRIS® Registry (Intelligent Research In Sight)

For either case, avoiding the penalty or trying for a bonus, the Academy's IRIS Registry can help you.

- The IRIS Registry is a free member benefit for those who pay their 2019 dues.
 - If you have not paid your dues, you cannot participate in the IRIS Registry. Please contact member services at the Academy if you are not sure if your membership dues have been paid. You can call toll free 866-561-8558 to reach a member services representative or email member_services@aao.org
- If you have not already signed up, make sure you do so by October 31, 2019.
- If you have signed up:
 - Make sure your contact information including email address is up to date with the registry – this includes your email and the person(s) you appoint to handle MIPS reporting (can confirm by emailing aao.support@bot.figmd.com and provide your practice name in the email).
- Remind your designated staff to check email for important information about reporting deadlines from the Academy and the IRIS Registry (emails may come from the IRIS Registry vendor, FIGmd – pay attention to these!)
- Complete reporting in IRIS Registry and signing a data release consent form by January 31, 2020.
- For help, call AAO customer service: 415.561.8540. If they can't answer your questions, they will transfer you to the appropriate person. You can also email questions to mips@aao.org (for MIPS questions), or irisregistry@aao.org (for IRIS Registry questions).

For information on how to report, visit the Academy's MIPS guides: www.aao.org/medicare.

For information on how to use IRIS Registry, visit the user guide available at <https://www.aao.org/iris-registry/user-guide/getting-started>.