

CMS Quality Payment Program Intersection With Maryland Model

CMS Quality Payment Program (QPP) Overview

The CMS QPP has two tracks: Advanced Alternative Payment Models (AAPMs) and Merit-based Incentive Payment Program (MIPS). Under an AAPM, Qualifying APM Participants (QPs) are those providers who meet participation thresholds for AAPM levels of payments **or** AAPM patients. QPs receive benefits:

- AAPM incentive payments paid two years after the performance period
- Exclusion from MIPS reporting
- Exclusion from MIPS payment adjustments.

Performance Years	2017-18	2019-20	2021-22	2023	2024	2025 and later
% Medicare Payments through AAPM	25%	50%	75%	75%	75%	75%
% Medicare Patients through AAPM	20%	35%	50%	50%	50%	50%
AAPM Incentive Payment	5%	5%	5%	3.5%	1.88%	Increased physician fee schedule update

QPP Intersection with Maryland Model

The Maryland Total Cost of Care Model is an AAPM. Clinicians who participate in its Care Redesign Program (CRP) tracks can become QPs if they meet either payment or patient participation thresholds shown above. The current two CRP tracks are the Episode Quality Improvement Program (EQIP) and the Episode Care Improvement Program (ECIP). Clinicians must be “vetted” annually to ensure each is eligible to participate in Medicare. For EQIP, clinicians are vetted by enrolling in the EQIP Enrollment Portal (EEP) each year. For ECIP, hospitals submit vetting lists of clinicians to CRISP. Once vetted, clinicians become “certified” by having a written CRP agreement in place with the hospital (University of Maryland Medical Center for EQIP, other hospitals for ECIP). ECIP hospitals submit certification lists of clinicians to CRISP. Participating in a non-ECIP Care Transformation Initiative (CTI) does **not** enable clinicians to become QPs.

Partial QPs

Not all clinicians who participate in an AAPM will meet participation thresholds required to achieve QP status. However, some clinicians may meet lower participation thresholds and become Partial QPs. Partial QPs do not receive AAPM incentive payments. They have the option to elect to participate in MIPS and receive a MIPS payment adjustment, or they may opt out of MIPS entirely.

Other Pathways to Become a QP in Maryland

Maryland clinicians have other pathways to become a QP, including participating in a Medicare Shared Savings Program ACO or other ACO models.