

Avoiding the MIPS Penalty in 2019

PAC Pearls from the Women's Dermatologic Society

By Dr. Mark Kaufmann

The bar has been raised.

The amount of MIPS points required to be exempted from the 7% penalty in 2021 (for performance year 2019), is DOUBLE what it was last year. Instead of 15 MIPS points, you now need to get 30 MIPS points. With a little more effort, there is still a way to avoid the MIPS penalty in 2019, and while it's still *possible* to do this without using a registry **OR** an EHR, both of them would make it a lot easier.

Here's how to get it done:

- If you are a small (fewer than 15 clinicians) practice, each clinician needs to complete five measures on at least one patient. I still recommend that each clinician complete five measures on more than one patient. Any combination of measures will do, and five will give you 15.75 points.
- In order to get up to 30 MIPS points, you will also need to do a High Weighted Improvement Activity (IA).
- You can choose any of the high weighted IAs from the [2019 Improvement Activities List](#), and if you want to do it without a registry or EHR, I would recommend doing the Complete CDC Training in Antibiotic Stewardship.
- Without a registry, you would have to attest to completing the IA by using the CMS QPP website, which is probably more difficult than doing the IA itself!
- If you use a registry, like DataDerm, they will attest for you...and by the way, it's probably the right time to consider getting DataDerm, as this will probably be the last year that I will be able to write this type of cheat sheet.
- Starting next year, you will have to choose between getting "in the game" or, taking a 9% penalty every year moving forward.

Food for thought.