

Quality Payment  
PROGRAM

# Payment Year 2024 Alternative Payment Model (APM) Incentive Payment

Help Desk Questions and Answers



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# How to Use This Guide

# Overview

**Please Note:** This guide was prepared for informational purposes only and isn't intended to grant rights or impose obligations. The information provided is only intended to be a general summary. It isn't intended to take the place of the written law, including the regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

## Table of Contents

The Table of Contents is interactive. Click on a Chapter in the Table of Contents to read that section.  You can also click on the icon on the bottom left to go back to the Table of Contents.

## Hyperlinks

Hyperlinks to the [Quality Payment Program website](#) are included throughout the guide to direct the reader to more information and resources.

# Overview

## Key Terms to Know

### APM Entity

- An APM Entity is an entity that participates in an APM through a direct agreement with CMS. An APM Entity is composed of Eligible Clinicians and their associated Taxpayer Identification Number (TIN), who are listed on a participant list, or an affiliated practitioner list associated with an Alternative Payment Model.

### Qualifying APM Participant (QP)

- A QP is an eligible clinician that receives at least 50% of Medicare Part B covered professional services payments or at least 35% of Medicare fee-for-service patients through an Advanced APM Entity.

### Billing National Provider Identifier (NPI)

- A unique identification number issued to each healthcare provider and organization to process payment claims and administrative transactions.

## Audience and Purpose

This resource is intended for:

- **QPs** who have earned the APM Incentive Payment
- **APM Entities**, as identified by the Taxpayer Identification Number (TIN) associated with QPs, who receive the Incentive Payment

This document aims to help QPs and APM Entities understand:

- Where APM Incentive Payments are paid
- Scenarios to receive the APM Incentive Payment
- Who can access the details about APM Incentive Payments
- What authorized persons can see [qpp.cms.gov](https://qpp.cms.gov)

## APM Incentive Payment

Pursuant to statute, APM Incentive Payments are made in each of payment years 2019 through 2024 for eligible clinicians who were determined to be QPs in performance periods 2017 through 2022, respectively. Originally, the APM Incentive Payment was equal to 5% of the estimated aggregate payment amounts for Medicare Part B covered professional services furnished by the QP during the “base period,” which is the calendar year preceding the payment year, across all billing TINs associated with the QP’s National Provider Identifier (NPI). However, in December 2022, Congress announced it included a value-based care incentive in its year-end spending bill and changed the APM Incentive Payment to 3.5% for the 2023 performance period/2025 payment year. In March 2024, Congress announced another update, and established a 1.88% APM Incentive Payment for QPs for the 2024 performance period/payment year 2026, as well as a 0.75 percent adjustment to the QP conversion factor that will be applied to Medicare payments for covered professional services beginning in 2026.

The APM Incentive Payment is based on the paid amounts for Medicare Part B covered professional services furnished by the QP across all their TIN/NPI combinations during the base period, which for purposes of 2021 QPs is calendar year 2023. Note that the APM Incentive Payment is based only on Part B covered professional services (services paid under the Part B physician fee schedule as well as certain payments noted below associated with payment under the Advanced APM), not all Part B items and services.

# Incentive Payment Overview

## What is the APM Incentive Payment?

An APM Incentive Payment is the lump sum incentive payment for a year paid to an eligible clinician who is a QP for the year from 2019 through 2024.

The following slides will answer frequently asked questions (FAQs) and provide detailed information about the QPP Portal.

**Reminder:** For the CY 2019-2022 performance years, Advanced APM participants with QP status were excluded from MIPS and eligible for a 5% APM Incentive Payment. However, in December 2022, Congress announced it included a value-based care incentive in its year-end spending bill and changed the APM Incentive Payment to 3.5% for the 2023 performance year/2025 payment year. In March 2024, Congress announced another update, and established a 1.88% APM Incentive Payment for QPs for the 2024 performance year/2026 payment year, as well as a 0.75 percent adjustment to the QP conversion factor that will be applied to Medicare payments for covered professional services beginning in 2026. The thresholds for performance year 2024/payment year 2026 were also frozen at 50% for payment amount and 35% for patient count.



## Why Did I Receive These Funds?

- You were an eligible clinician participating in Advanced APM;
- You were on the participation list for an APM Entity;
- APM Entity participated in an Advanced APM;
- You achieved QP status for the CY 2022 performance period;
- In 2023, you billed and received payment for covered professional services; AND

**\* Your 2024 APM Incentive Payment is based on your 2023 billed covered professional services.**

## I Submitted My Information on the Billing Request Form, but I Still Have Not Received My APM Incentive Payment. Now What?

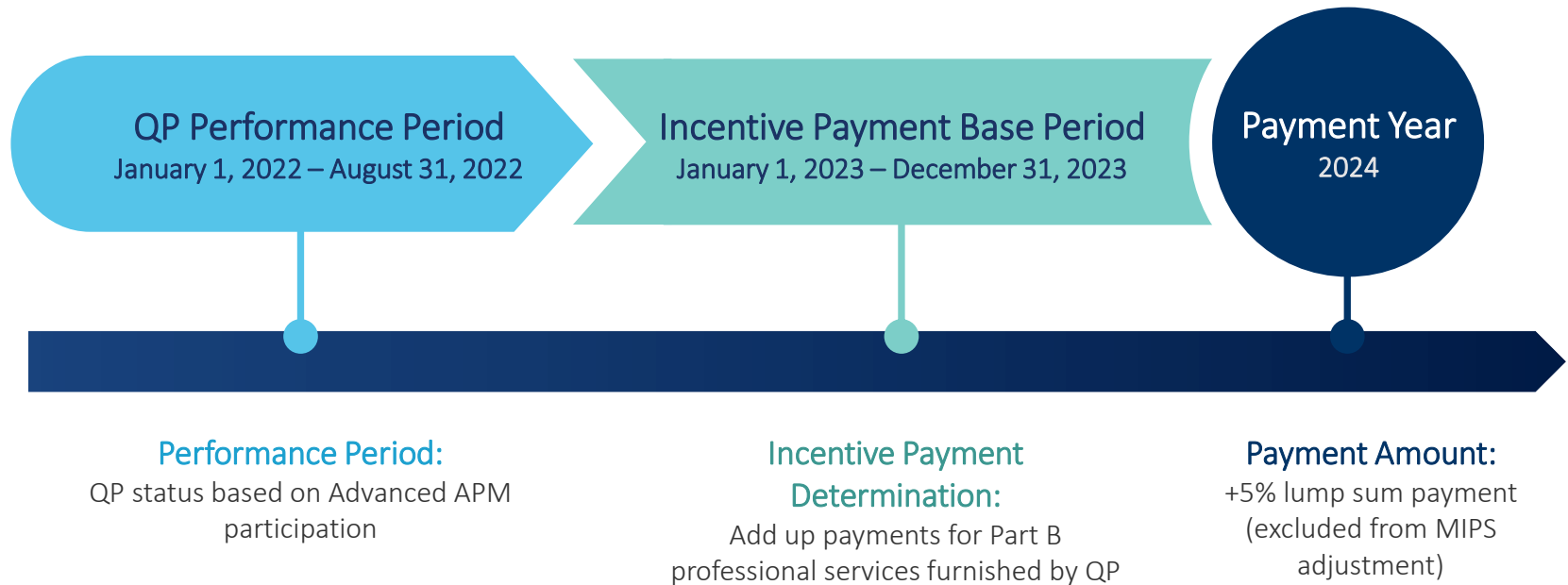
The enrollment information submitted did not match an active billing arrangement. Possible reasons include, but are not limited to:

- The information provided, especially when handwritten, was misinterpreted; a 1 (one) was interpreted as an L or a 0 (zero) was interpreted as the letter O.
- The Medicare ID provided was the individual provider's ID and not the billing organization's ID.



## When Did I Earn the APM Incentive Payment?

APM Incentive Payments are issued 2 years after the Qualifying APM Participant status is earned.



**Reminder:** CY 2022 performance period /payment year 2024 was the last time eligible clinicians could earn a 5% APM Incentive Payment. For the CY 2023 performance period/2025 payment year, QPs are eligible to receive a 3.5% APM Incentive Payment, and for the CY 2024 performance period/2026 payment year, QPs are eligible to receive a 1.88% APM Incentive Payment.

## What Happens if I am No Longer Practicing with the TIN I was Associated with When I Achieved QP Status or No Longer Actively Billing Medicare?

- CMS uses billing activity during the base year to identify billing organizations (TINs) to disburse the Incentive Payment.
- If billing relationships present during the base year no longer exist when APM Incentive Payments are determined, CMS looks for current billing relationships.
- For QPs for whom we do not identify an associated TIN, we publish a public notice requesting these QPs to provide current billing information so that we can disburse payments. A QP who fails to respond by the deadline, or does not respond correctly, forfeits their claim to the APM Incentive Payment for the year.

\*QPs can submit their information by the specified date that is the later of a 60-day deadline or September 1st of the payment year or forfeit their claim to an APM Incentive Payment for the year.

## Why is My Payment Lower than I Expected?

- Possible reasons include, but are not limited to:
  - If you are a **QP**, CMS identified more than one TIN to whom payment should be made, and so the payment was split between them according to the proportion of total Medicare Part B claims billed through more than one.
  - If you are a **TIN**, the QP may no longer be affiliated with your practice, or another TIN or TINs associated with the QP were identified and payments were made through them.
- The payment is calculated on paid amounts for Medicare Part B claims for Covered Professional Services.
  - The amount of the APM Incentive Payment is equal to 5% of the estimated aggregate payments for covered professional services as defined in section 1848(k)(3)(A) of the Act. If you are a QP, CMS identified more than one TIN to whom payment should be made, and so the payment was split between them according to the proportion of total Medicare Part B claims billed through more than one.

**Reminder:** Performance period 2022/payment year 2024 was the last time eligible clinicians could earn a 5% APM Incentive Payment. For the 2023 performance period/2025 payment year, QPs will receive a 3.5% APM Incentive Payment, and for the 2024 performance period/2026 payment year, QPs will receive a 1.88% APM Incentive Payment.



## Why Did It Take So Long to Receive My Incentive Payment?

- The APM Incentive Payments are made two years after the year in which eligible clinicians attained QP status, i.e., those who become QPs based on their participation with Advanced APMs in 2022 receive the APM Incentive Payment in 2024.
- Once we reach the payment year (2024) we calculate the APM Incentive Payment from the previous year (2023). Payments are then scheduled for the next available payment period.
- If CMS attempts to complete a payment but the payment information in CMS's systems, such as PECOS, are not up to date, the payment may be delayed while CMS attempts to identify an alternative payee TIN.

**Note:** According to the Medicare Program Integrity Manual, Chapter 10, Section 1.2, all changes of ownership, location changes or updates to final adverse actions must be reported within 30 days of the change and any other change must be reported to PECOS within 90 days of the change. We rely on information in the PECOS system to validate all Medicare payments, including the APM Incentive Payment. Invalid enrollment information may result in an inability to complete payments. If you have any specific questions regarding updating PECOS information, please visit <https://pecos.cms.hhs.gov/>.



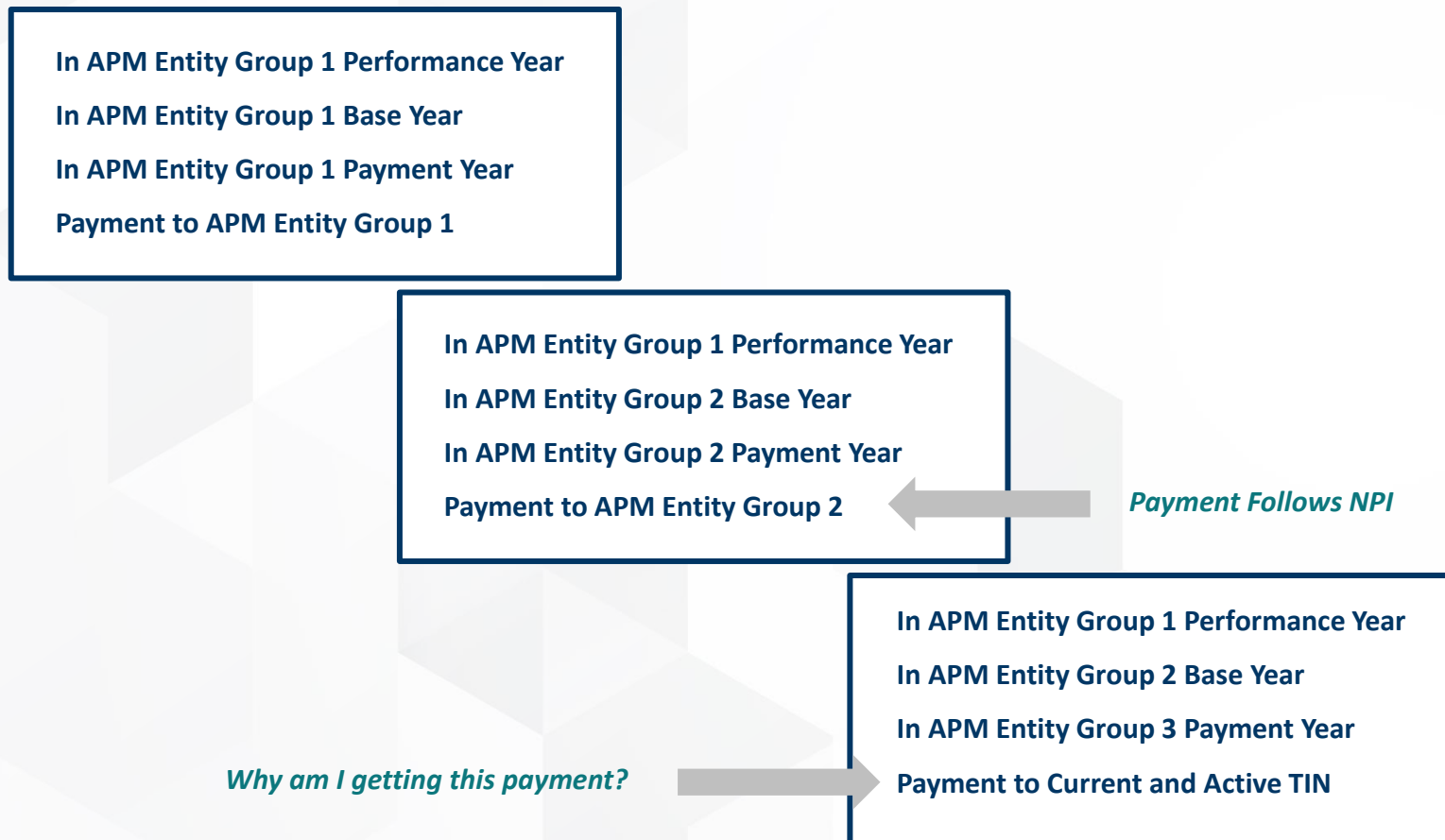
## Why Aren't All the Payments Made at the Same Time?

The Incentive Payments are typically disbursed 3 times during the payment year.

1. The first disbursement accounts for QPs who are currently submitting claims through the same billing arrangement in place during the base year. Examples:
  - A Reassignment of Benefits has been active since the base year.
  - A Physician Assistant is still employed by the same practice as in the base year.
2. The second disbursement accounts for QPs who are no longer submitting claims through the same billing arrangement in place during the base year but are actively submitting claims through a new billing arrangement.
  - The Reassignment of Benefits in place during the base year has been terminated but a new Reassignment of Benefits is in place.
  - A Physician Assistant is no longer employed by the Practice during the base year but is employed by a new Practice.
3. The final disbursement accounts for QPs for whom CMS was unable to find a current billing arrangement and has requested billing information to be provided to CMS via the Public Notice.

## Why Did My Payment Go to a Different TIN

This is usually the result of multiple reassignments for an NPI found in PECOS.



## Why Did My Payment Go to a Different TIN? (Continued)

- Since Incentive Payments are made 2 years after becoming a QP, it's likely that billing arrangements have changed during that time; different Reassignment of Benefits or changed employers.
- **CMS will pay the billing organization with the closest association to the APM Entity Group under which QP Status was attained.**
- It is also possible that your Incentive Payment was paid to more than one billing organization resulting in a "split payment." This occurs if there are multiple billing organizations with the same association to the APM Entity.

While it is CMS's goal to make the APM Incentive Payment to a QP through the TIN associated with their Advanced APM participation during the QP Performance Period, it is not always possible to do so.

We make Incentive Payments to the TINs associated with the QP according to the hierarchy codified at § 414.1450 and discussed at 85 FR 84472 in the CY 2021 PFS final rule.

According to this hierarchy, we attempt to identify a current and active TIN relationship at each step of the hierarchy. If a potential payee is identified, we will validate their payment information through PECOS. If no payee TIN is identified at a step, we will continue to the next step in the hierarchy.



## Are APM Entities Entitled to the APM Incentive Payments?

- No, the APM Incentive Payment is earned by the QP (the eligible clinician participating in the Advanced APM).
- The APM Entity (Medicare Shared Savings Program, ACO REACH, CKCC, etc.) is not entitled to any portion of this money under QPP.

## How do I Identify the APM Incentive Payment on the Remittance?

- The APM Incentive Payment can be identified on the 4th addendum line as “CMMI QPP NGS”
- The APM Incentive Payment can be identified on the 5th and/or 6th addendum line as “CMS-QPP-QPIN”



## Using the QPP Portal

## Overview

In this section, you will learn about the Access Roles for APM Entities when logging into the QPP Portal. In addition, you will learn what types of reporting and payment information users at the TIN level are able to see and access. Finally, we provide TIN Level screenshots and NPI Level screenshots to help navigate the QPP portal screens.

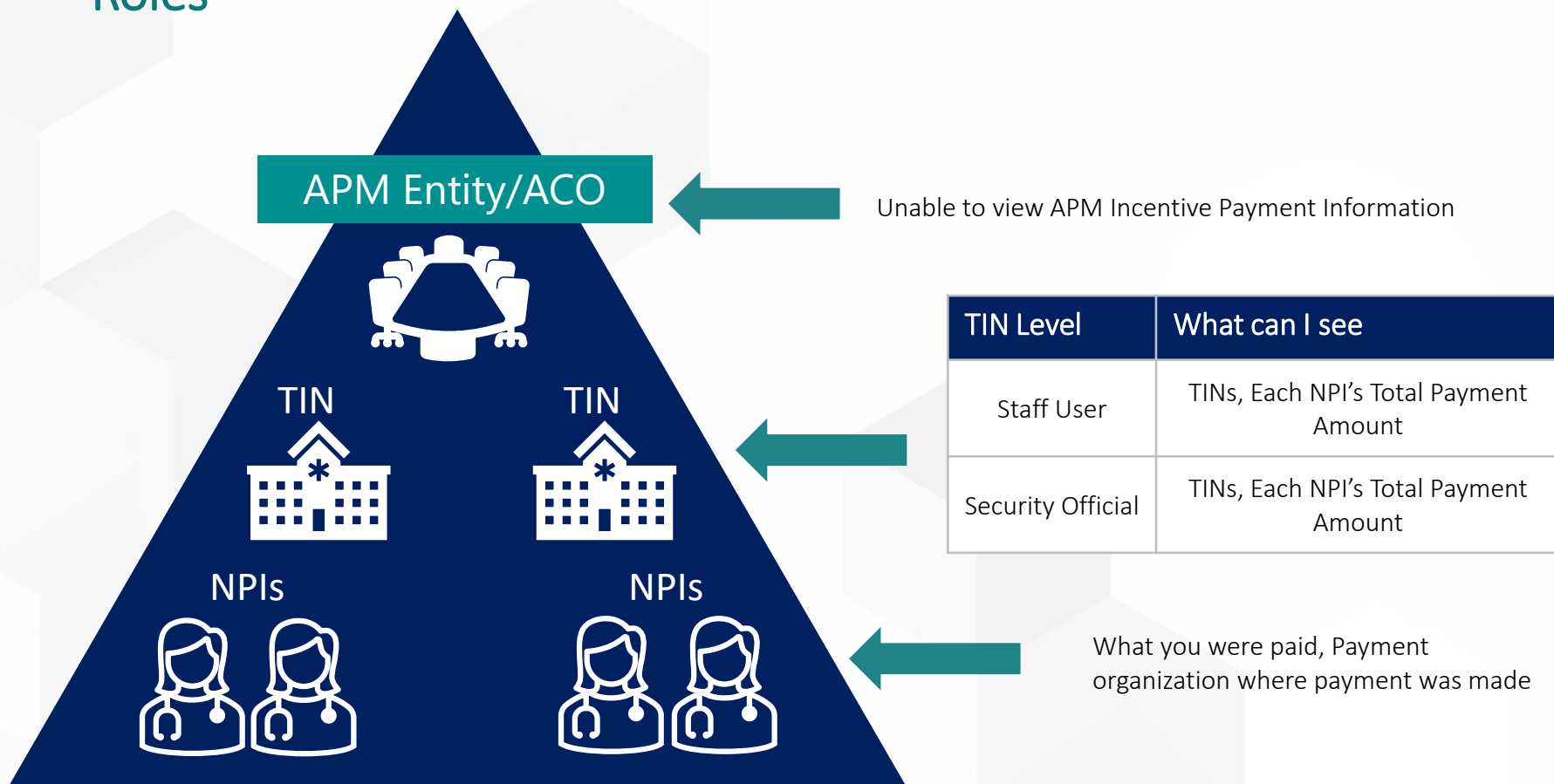


## What Are the Access Roles for APM Entities in the QPP Login?

| You are a...                                                 | You want to...                                                                                                                                                                                                                                                                                                                                                | The role you need is... | From Manage Access, you will...                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Representative of an Alternative Payment Model (APM) Entity: | <ul style="list-style-type: none"> <li>• <b>Submit</b> quality data on behalf of the APM Entity</li> <li>• <b>View</b> a list of participating practices and clinicians in the APM</li> <li>• <b>View</b> MIPS performance feedback</li> <li>• <b>Preview</b> public reporting data for Medicare Care Compare (formerly Physician Compare website)</li> </ul> | Staff User              | <ol style="list-style-type: none"> <li>1. <b>Connect to an Organization</b> (Organization type = APM Entity)</li> <li>2. <b>Identify the APM with which your APM Entity participates</b> (e.g., if your organization is a Shared Shavings Program ACO, select 'Shared Saving Program (SSP)')</li> <li>3. <b>Find your APM Entity</b> (search by its legal business name)</li> <li>4. <b>Select the <u>Staff User</u> role</b></li> <li>5. <b>Wait to be approved by the Security Official</b> (contact QPP if you need assistance identifying your organization's Security Official.</li> </ol> <p><b>Note:</b> Your organization must have at least one individual with the Security Official role before anyone can request a Staff User role.</p> |
|                                                              | <ul style="list-style-type: none"> <li>• Everything above <b>plus</b></li> <li>• Approve or deny role requests from other users requesting access to your organization's account</li> <li>• <b>Register</b> for the CMS Web Interface or CAHPS for MIPS Survey.</li> </ul>                                                                                    | Security Official       | <ol style="list-style-type: none"> <li>1. <b>Connect to an Organization</b> (Organization type = APM Entity)</li> <li>2. <b>Identify the APM with which your APM Entity participates</b> (e.g., if your organization is a Shared Savings Program ACO, select 'Shared Saving Program (SSP)')</li> <li>3. <b>Find your APM Entity</b> (search by its legal business name)</li> <li>4. <b>Select the <u>Security Official</u> role</b></li> <li>5. <b>Enter the additional information for validation:</b> <ul style="list-style-type: none"> <li>• APM Entity ID</li> <li>• The Taxpayer Identification Number (TIN)</li> </ul> </li> </ol>                                                                                                            |



# Identify Nuances Associated with APM Incentive Payment and Roles



# Where Is The APM Incentive Payment

The APM Incentive Payment option shows at both the TIN and NPI Levels.

Quality Payment  
PROGRAM

Joe Test

- Account Home
- Eligibility & Reporting
- Performance Feedback
- APM Incentive Payments**
- Doctors & Clinicians Preview
- Exceptions Application
- Targeted Review
- Reports
- Manage Access
- Help and Support

About  
The Quality Payment Program

MIPS  
Merit-based Incentive Payment System

APMs  
Alternative Payment Models

Resources  
Help, Support and Resources

Joe  
My Account

You will only see this if you an APM Incentive Payment is owed.

## Welcome back Joe Test!

Aug 1, 2020  
Submission Window is open

Mar 1, 2021  
Last Day to submit 2019 data

Mar 2, 2021  
Preliminary Performance Feedback Available

Summer 2021  
Final Performance Feedback is available

**Preliminary 2020 Performance Feedback Available**

Your preliminary 2020 performance year feedback is now available. Your final score will be available Summer 2021. Your performance feedback could change based on additional information being entered into the system.

[VIEW FEEDBACK](#)

**2020 Submission Window has Closed**

[VIEW ELIGIBILITY DETAILS](#)



# TIN Level View

Quality Payment PROGRAM

Joe Test

Account Home /

**APM Incentive Payment**  
PY 2018

Performance Year 2018

The APM Incentive Payment will be sent as a 5% lump sum to the Medicare billing organization associated with the clinician attaining QP status. The billing organization is responsible for dispersing funds to clinicians.

Practices Receiving APM Incentive Payments  
Showing 4 Practices

Search by TIN

| Practice Name        | TIN       | Number of QPs | APM Incentive Payment |
|----------------------|-----------|---------------|-----------------------|
| Swaniawski - Pacocha | 000594263 | 2             | \$297.89              |
| APM-Organization-15  | 999058167 | 2             | \$165.18              |
| APM-Organization-44  | 999146173 | 22            | \$2,036.01            |

Tax ID

VIEW PAYMENT DETAILS

Download Data

- You can determine this is the TIN Level view because the number of QPs are listed.
- If you are viewing at the NPI Level, you will only see the payment.

Select to view on screen details...

Total of all APM Incentive Payments for all QPs that have an NPI associated with the TIN.

# TIN Level View (Continued)

Quality Payment  
PROGRAM

Account Home

Swaniawski - Pacocha  
TIN: 000594263

Payment Details

→← COLLAPSE

About -  
The Quality Payment  
Program

MIPS -  
Merit-based Incentive  
Payment System

APMs -  
Alternative Payment  
Models

Resources -  
Help, Support and  
Resources

Joe -  
My Account

Account Home / APM Incentive Payments /

**Swaniawski - Pacocha**  
TIN: 000594263

Performance Year 2018

Print

**Swaniawski - Pacocha Payment Details**

|                    |                                   |
|--------------------|-----------------------------------|
| Number of QPs<br>2 | APM Incentive Payment<br>\$297.89 |
|--------------------|-----------------------------------|

**Clinician Contributions**  
Showing 2 Clinicians

Search by NPI

| Clinician Name                          | APM Incentive Payment | Payment Information |
|-----------------------------------------|-----------------------|---------------------|
| <b>Maddie Kuzma</b><br>NPI: 0002357354  | \$38.99               | ✓ Payment Processed |
| <b>Mohammad Wong</b><br>NPI: 0002357362 | \$258.90              | ✓ Payment Processed |

Select to view on screen details...

| Payment Information                                           | Description                                      |
|---------------------------------------------------------------|--------------------------------------------------|
| Payment Processed                                             | Deposit made to bank account                     |
| Unable to Process (status remains until payment is completed) | CMS could not verify current billing information |



# NPI Level View

Home

Dashboard

Star

Account

Calendar

Help

Settings

Info

EXPAND

EXPAND

Quality Payment PROGRAM

About

MIPS

APMs

Resources

Joe

Account Home /

APM Incentive Payment

Performance Year 2018

Performance Year 2018

The APM Incentive Payment will be sent as a 5% lump sum to the Medicare billing organization associated with the clinician attaining QP status. The billing organization is responsible for dispersing funds to clinicians.

Joe Clinician Payment Details

Number of Billing Organizations

2

APM Incentive Payment

\$702.90

Some APM Incentive Payments cannot be processed at this time.

Payment Disbursement

| Billing Organization | Billing TIN | Billing NPI | Payment  |
|----------------------|-------------|-------------|----------|
| APM-Organization-04  | 999020696   | 0002357354  | \$301.00 |
| APM-Organization-04  | 999020696   | 0112357354  | \$301.00 |
| APM-Organization-77  | 999221170   | 0000455069  | \$100.90 |

\*If you are unfamiliar with your billing organization and would like to obtain additional information about it, you can enter the NPI for the billing organization in the [NPI Registry Public Search](#).



# NPI Level View (Continued)

The screenshot shows the Quality Payment Program portal interface. The left sidebar contains a navigation menu with the following items: Payment Testing, Account Home, Eligibility & Reporting, Performance Feedback, APM Incentive Payments (circled in red), Doctors & Clinicians Preview, Exceptions Application, Targeted Review, Reports, Manage Access, and Help and Support. The main content area displays the 'APM Incentive Payments' section for the 'Performance Year 2018'. It includes a 'Practices' and 'Clinicians' tab, with the 'Clinicians' tab selected. A teal callout box points to the 'APM Incentive Payments' menu item, stating: 'You will only see this if you have an APM Incentive Payment'. Another teal callout box points to the 'Clinicians' tab, stating: 'Tab indicates that you are viewing as at the clinician level'. Below the tabs, a message states: 'The APM Incentive Payment will be sent as a 5% lump sum upon attaining OP status. The billing organization is responsible'. The 'Payment Testing Payment Details' section shows 'Number of Billing Organizations' as 8 and 'APM Incentive Payment' as \$2,849.80. A teal callout box points to this amount, stating: 'Aggregate APM Incentive Payment amount'. The 'Payment Disbursement' table lists the following data:

| Billing Organization | Billing TIN | Billing NPI | Payment   |
|----------------------|-------------|-------------|-----------|
| APM-Organization-04  | 999020696   | 0002357354  | \$101.19  |
| APM-Organization-15  | 999058167   | 3456789012  | \$63.99   |
| APM-Organization-44  | 999146173   | 4567890123  | \$1010.88 |
| APM-Organization-68  | 999192724   | 3123456789  | \$54.22   |
| APM-Organization-68  | 999192724   | 4567890000  | \$54.22   |

A teal callout box points to the table, stating: 'APM Incentive Payment amount broken down by Billing TIN /NPI.'

## Help and Version History

## Where Can You Go for Help?

Contact the Quality Payment Program Service Center by email at [QPP@cms.hhs.gov](mailto:QPP@cms.hhs.gov), by creating a [QPP Service Center ticket](#), or by phone at 1-866-288-8292 (Monday through Friday, 8 a.m. - 8 p.m. ET).

- People who are deaf or hard of hearing can dial 711 to be connected to a TRS Communications Assistant.

Visit the [Quality Payment Program website](#) for other [help and support information](#), to learn more about [MIPS](#), and to check out the resources available in the [Quality Payment Program Resource Library](#).

Visit the [Small Practices page](#) of the Quality Payment Program website where you can **sign up for the monthly QPP Small Practices Newsletter** and find resources and information relevant for small practices.



## Version History

If we need to update this document, changes will be identified here.

| DATE       | DESCRIPTION                       |
|------------|-----------------------------------|
| 08/21/2024 | Updated call-out box on slide 10. |
| 06/27/2024 | Original Posting.                 |