

Merit-based Incentive Payment System (MIPS)

2025 Opt-in and Voluntary
Reporting Election Guide



Table of Contents

<u>How To Use This Guide</u>	<u>3</u>
<u>Overview</u>	<u>5</u>
<u>Sign in to the QPP Website to Complete Your Election</u>	<u>13</u>
<u>Election Process</u>	<u>17</u>
<u>Practice Representatives: Election Process</u>	<u>19</u>
<u>Eligibility & Reporting Homepage</u>	<u>25</u>
<u>QCDRs and Qualified Registries: Election Process</u>	<u>27</u>
<u>Help, Resources, and Version History</u>	<u>34</u>

Already know what MIPS is? Skip ahead by clicking the links in the Table of Contents.

Purpose:

This guide will cover the general information about opt-in elections, as well as the election process on the QPP website for practice representatives (staff, clinicians, solo practitioners) and Qualified Clinical Data Registries (QCDRs)/Qualified Registries. Both practice representatives and QCDRs/registries can submit opt-in elections on behalf of a group and individual clinicians, but the workflow differs.

How to Use this Guide

How to Use This Guide

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

Opt-In Eligible Clinicians and Groups

A clinician or group that is otherwise eligible for MIPS and exceeds 1 or 2, but not all 3 low-volume threshold criteria, is considered “opt-in eligible.”

If you’re opt-in eligible, you can:

- **Do nothing.** You don’t exceed the low-volume threshold and aren’t required to participate in MIPS.
- **Elect to opt-in.** If you choose to opt-in, you’ll submit data, receive performance feedback, and receive a MIPS payment adjustment in 2027.
 - You can opt-in to report [traditional MIPS](#) or the [APM Performance Pathway \(APP\)](#).
 - You **can’t** opt-in to report a [MIPS Value Pathway \(MVP\)](#).
- **Elect to voluntarily report.** If you don’t want to receive a MIPS payment adjustment in 2027, but want to participate in MIPS, you can voluntarily report data and receive limited performance feedback on the data you report.
 - You can voluntarily report [traditional MIPS](#).
 - You **can’t** voluntarily report a [MIPS Value Pathway \(MVP\)](#) or the [APM Performance Pathway \(APP\)](#).

Note:

APM Entities can’t opt-in to MIPS. However, opt-in eligible clinicians and groups who are also MIPS APM Participants can opt-in to participate in traditional MIPS and/or the APM Performance Pathway (APP) at the individual or group level.

Don’t Want to Submit Data?

Opt-in eligible clinicians, groups, and APM entities that don’t want to submit data **DON’T** have to make an election.



OVERVIEW

Opt-In Eligible Clinicians and Groups (Continued)

A clinician or group that is otherwise eligible for MIPS and exceeds 1 or 2, but not all 3 low-volume threshold criteria, is considered “opt-in eligible.”

If you’re opt-in eligible,

- You must submit and confirm an election to opt-in or voluntarily report for your opt-in eligible clinicians and groups before their data can be submitted.
- Once an election is made to opt-in or voluntarily report, **the decision is final and can’t be reversed.**

Virtual Groups: If a group is part of a virtual group and exceeds 1 or 2, but not all 3 low-volume threshold criteria (and is otherwise eligible to participate in a virtual group), the group is considered “opt-in eligible” and will be able to participate in MIPS as part of a virtual group. A virtual group election that includes the listing of such group confirms such group’s election to opt-in and participate in MIPS as part of a virtual group.

Note:

APM Entities aren’t evaluated for the low-volume threshold. However, opt-in eligible clinicians and groups who are also MIPS APM Participants can opt-in to participate in traditional MIPS and/or the APM Performance Pathway (APP) at the individual or group level.

Don’t Want to Submit Data?

Opt-in eligible clinicians, groups, and APM entities that don’t want to submit data **DON’T** have to make an election.



Important Dates and Deadlines: Opt-in and Voluntary Reporting Elections

December 2025

- Updated MIPS eligibility determinations for the 2025 performance period is released; Data is reconciled from the two 12-month segments of the [MIPS Determination Period](#).
- **HOW DO I KNOW IF I'M ELIGIBLE?**
 - Check your final MIPS eligibility status for the 2025 performance period using the [QPP Participation Look Up Tool](#).

March 31, 2026

- 2025 opt-in and voluntary reporting election period and data submission period ends on March 31, 2026.
- **WHEN DO I NEED TO ELECT TO OPT-IN OR REPORT VOLUNTARILY BY?**
 - If you're opt-in eligible and want to submit data, you must complete your opt-in or voluntary reporting election and submit your data by **March 31, 2026**.

January 2, 2026

- 2025 opt-in and voluntary reporting election period and data submission period opens January 2, 2026.
- **HOW DO I ELECT TO OPT-IN OR REPORT VOLUNTARILY?**
 - Sign into the [QPP website](#) to complete the opt-in or voluntary reporting election in order to submit data.
 - If you're working with a QCDR or Qualified Registry, they can also complete this election on your behalf before submitting your data.



Opt-In Eligible Individuals and Groups

INDIVIDUAL CLINICIANS	GROUPS
Opt-in eligible clinicians will see the following status on the QPP Participation Look Up Tool. MIPS Eligibility: INDIVIDUAL Opt-in Option: Opt-in-eligible as individual	Opt-in eligible groups will see the following status on the QPP Participation Look Up Tool. MIPS Eligibility: GROUP Opt-in Option: Opt-in eligible as group
If you're opt-in eligible as an individual, you can: • Make an individual election to opt-in or voluntarily report to traditional MIPS so you can submit data as an individual; • Individual clinicians in a MIPS APM: Make an election to opt-in to report the APP as an individual (you can't voluntarily report the APP) • Do nothing (you're not required to participate in MIPS as an individual or make an election).	If you're opt-in eligible as a group, you can: • Make a group election to opt-in or voluntarily report to traditional MIPS so you can submit data as group; • Groups w/ clinicians in a MIPS APM: Make an election to opt-in to report the APP as a group. The final score earned by the group through the APP would be applied only to those MIPS eligible clinicians who appear on a MIPS APM's Participation List or Affiliated Practitioner List on one or more snapshot dates. • Do nothing (you're not required to participate in MIPS as a group or make an election).



Opting-In vs. Voluntary Reporting

If you're opt-in eligible for the 2025 performance period **and** want to submit MIPS data, you need to choose whether to **opt-in** or **voluntarily report**.

IF YOU ELECT TO OPT IN:	IF YOU ELECT TO VOLUNTARY REPORT:
✓ Participants in a MIPS APM can choose whether to report the APP or traditional MIPS. ✗ You can't opt-in to report an MVP.	✓ Participants in a MIPS APM can voluntarily report via traditional MIPS. ✗ You can't voluntarily report the APP or an MVP.
✓ You will receive a MIPS payment adjustment (positive, negative, or neutral).	✓ You won't receive a payment adjustment.
✓ You'll receive performance feedback.	✓ You'll receive limited performance feedback ✗ You won't receive feedback on cost measures or claims quality measures.
✓ Your data will be included in measure benchmark calculations.	✗ Your data won't be included in measure benchmark calculations.
✓ Your data will be made available for public reporting in the Doctors & Clinicians section of Medicare Care Compare.	✓ Your data will be made available for public reporting in the Doctors & Clinicians section of Medicare Care Compare. Voluntary reporters can choose to opt-out of having their data publicly reported during the Care Compare Preview period (expected in Spring 2026).

While unlikely, it's possible that both a practice and a clinician are opt-in eligible. If the practice elects to opt-in as a group and the clinician elects to opt-in as an individual, the clinician would be assigned the higher of the two final scores and associated payment adjustment.



Opting-in as a Group

- If you opt-in to traditional MIPS as a group, all MIPS eligible clinicians in the practice will receive a payment adjustment based on the group's performance.
- If a group opts-in to the APP, the final APP score earned by the group only applies to clinicians who appear on a MIPS APM's Participation List or Affiliated Practitioner List on one or more snapshot dates.
- Clinicians in the group that opted-in to the APP who are not MIPS APM participants will not receive a payment adjustment based on their group's APP performance; these clinicians will receive a traditional MIPS score. Final payment adjustment will be based on the highest available score or virtual group participation, if applicable.



What Do I Need to do to Prepare for This Election Process?

To complete the election to opt-in or report voluntarily, you need to:



Verify Your MIPS Eligibility for the 2025 performance period.

- Check your final MIPS eligibility using the [QPP Participation Look Up Tool](#).



Confirm and Communicate Your Decision to Opt-in or Voluntarily Report.

- If you're working with a QCDR or Qualified Registry, make sure to communicate whether you want to opt-in or voluntarily report traditional MIPS, or opt-in to report the APP.



Have a HARP Account and QPP Role to complete the election.

- Review the [QPP Access User Guide \(ZIP, 5MB\)](#) for information about creating an account and requesting a QPP role.

Submitting Opt-in and Voluntary Reporting Elections via Application Programming Interface (API)

Authorized QCDR and Qualified Registry representatives can submit opt-in and voluntary reporting elections on behalf of their opt-in eligible clients via the [QPP API](#).

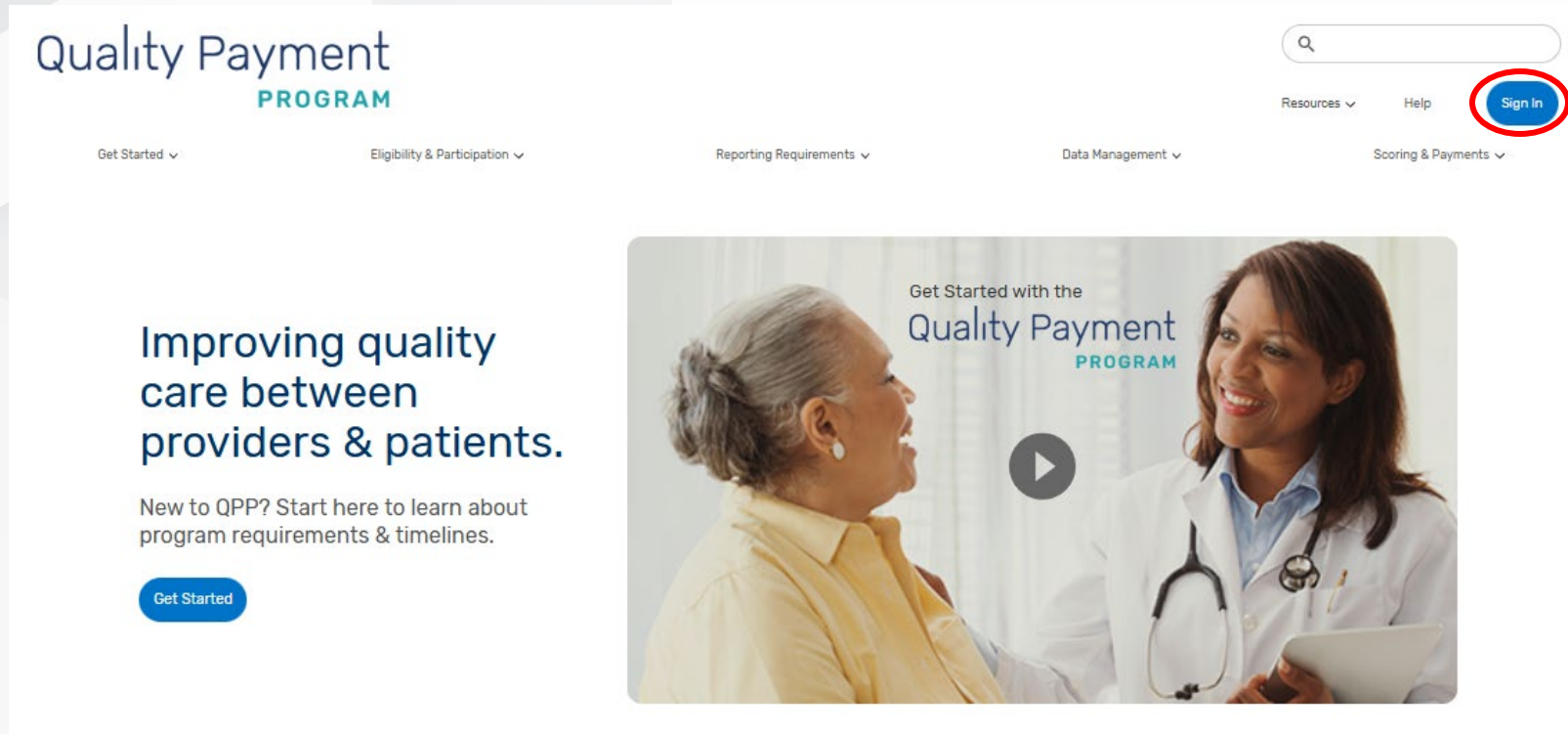
- Elections can be made during the submission period (January 2, 2026, through March 31, 2026).
- [Eligibility API documentation](#) contains instructions on how to submit opt-in and voluntary reporting elections.
- Elections must be made before you can use the [Submissions API](#) to submit data on behalf of opt-in eligible clients.



Sign in to the QPP
Website to Complete
Your Election

Navigate to the QPP Website

- All users will navigate to the [QPP website](#) and click **Sign In** found in the upper right corner of the page to sign in to your QPP Account to complete your election to opt in or voluntarily report.



Disclaimer: This guide captures images of the process for opting-in or voluntarily reporting. The information captured in the screenshots may not be the exact language, workflow, or design that is finalized in the system.

Sign in to your QPP Account

Enter your **User ID** and **Password**. Then click **“Sign in.”**
Click **“Yes, I agree”** to the Statement of Truth prompt.

Click **Register for QPP** to establish your sign in credentials through the HCQIS Access Roles and Profile (HARP) system. To access HARP, click **Register with HARP**.

Review the [QPP Access Guide \(ZIP, 5MB\)](#) for information on the registration process.

Sign in to QPP

User ID

Password

[Show password](#)

Forgot user ID or password

If you are a representative of a Shared Savings Program ACO and can access the ACO Management System (ACO-MS), then you can sign in to QPP using the same User ID and Password.

Sign in >

OR

Register for QPP

Sign in to QPP

User ID

Password

[Show password](#)

Forgot user ID or password

If you are a representative of a Shared Savings Program ACO and can access the ACO Management System (ACO-MS), then you can sign in to QPP using the same User ID and Password.

Sign in >

OR

Register for QPP



Navigate to Eligibility & Reporting

After you successfully sign in, click the **Eligibility & Reporting** tab found on the left side navigation bar or click **Start Reporting** on the right side of the page.

The screenshot displays the QPP website interface. On the left is a dark blue navigation bar with four items: 'Account Home' (house icon), 'Registration' (pencil icon), 'Eligibility & Reporting' (calendar icon, highlighted with a red border), and 'Performance Feedback' (star icon). The main content area has a light gray background. A white announcement box contains a calendar icon, the text 'Performance Year (PY) 2025 Submission Reporting Window is Now Open', and a subtext 'You are now able to start your reporting for the PY 2025 submission year.' To the right of this box is a blue button with the text 'Start reporting', which is also highlighted with a red border.

Election Process

Election Process Workflows

Both practice representatives and QCDRs/registries can submit opt-in elections on behalf of a group and individual clinicians, but the workflow differs:

- [Practice Representatives](#) (i.e., Staff, Clinicians, Solo Practitioners)
- [QCDRs and Qualified Registries](#)



Practice Representatives: Election Process

Step 1: Select the Practices Tab

Click on the **Practices tab** and review the practices you are connected to. If you don't see a practice, please refer to the [QPP Access Guide \(ZIP, 5MB\)](#) for information on connecting to an organization.

The screenshot displays the Quality Payment Program interface. On the left is a dark blue sidebar with navigation links: Account Home, Registration, Eligibility & Reporting (highlighted), Performance Feedback, APM Incentive Payments, Doctors & Clinicians Preview, Exceptions Application, Targeted Review, Reports, Manage Access, and Help and Support. The main content area has tabs for Registries, APM Entities, and Practices (highlighted with a red box). Below the tabs is a search bar labeled 'Search by practice name' and a status 'Showing 1 - 7 of 7 Practices | Download'. The main content area shows details for 'Bönisch UG', including TIN: #000000939, address, and status 'MIPS ELIGIBLE'. On the right are three blue buttons: 'Report as Group', 'Report as Subgroup', and 'Report as Individuals'. Below the practice details is a section for 'Exceeds Low Volume Threshold: Yes' with various metrics. At the bottom right is a link 'View practice details & clinician eligibility >'. Below the screenshot is a horizontal timeline with five steps: 'Select the Practices Tab' (circled), 'Report as a Group or Individual Clinician', 'Group Reporting Options', 'Confirm Selection', and 'Start Reporting'.



Step 2: Report as a Group or Individual Clinician

Select **Report as Group** (or **Report as Individuals**) to the right of the practice's eligibility summary to begin the election process.

- This guide uses a group election example.
- If you select **Report as Individuals** a list of clinicians associated with the practice will populate. Select **Report as Individual** to the right of an opt-in eligible clinician's name to make an election for that clinician.

ITTestOrg-19
TIN: #000043619 | 690 Thomas Branch Suite 1943, Port Jamesmouth, RI 02882

⊗ MIPS EXEMPT [Opt-in eligible](#)

Exceeds Low Volume Threshold: No
Medicare Patients at this practice: 934,981
Allowed Charges at this practice: \$938,684.00
Covered Services at this practice: 351,070
Special Statuses, Exceptions and Other Reporting Factors: None

[View practice details & clinician eligibility >](#)

Reminder: If your practice is participating as a group, you don't need to make an election for individual clinicians unless they are also submitting individual data.



Step 3: Group Reporting Options

Reporting options for the group (or individual clinician) will populate with descriptions of each election option.

Select either **Opt-In** or **Report Voluntarily** to proceed with the election process.

- Select **Opt-In** if you're electing for the practice to receive a MIPS final score based on a group submission and for all MIPS eligible clinicians to receive a payment adjustment.

OR

- Select **Report Voluntarily** if you're electing for the practice to receive a MIPS final score based on a group submission, but no payment adjustment for the MIPS eligible clinicians.
 - **NOTE:** You can't voluntarily report the APP or MVP.

Change Your Mind? If you change your mind, you also can **cancel** and go back to the main Eligibility & Reporting page.

Select the Practices Tab

Report as a Group or
Individual Clinician

Group Reporting
Options

Confirm Selection

Start Reporting

Group Reporting Options



To participate in MIPS, you must decide whether you will **opt-in** or **report voluntarily** before any data can be submitted.

ITTestOrg-19

TIN: 000043019

MIPS EXEMPT

Elect to Opt-In

By electing to Opt-In, you become MIPS eligible. You will receive a MIPS final score and a payment adjustment in 2027.

Opt-In

Choose to Report Voluntarily

By voluntarily reporting MIPS data, you will receive performance feedback for informational purposes only. You will not receive a payment adjustment in 2027. Voluntary reporting through the APM Performance Pathway (APP) isn't permitted.

Report Voluntarily

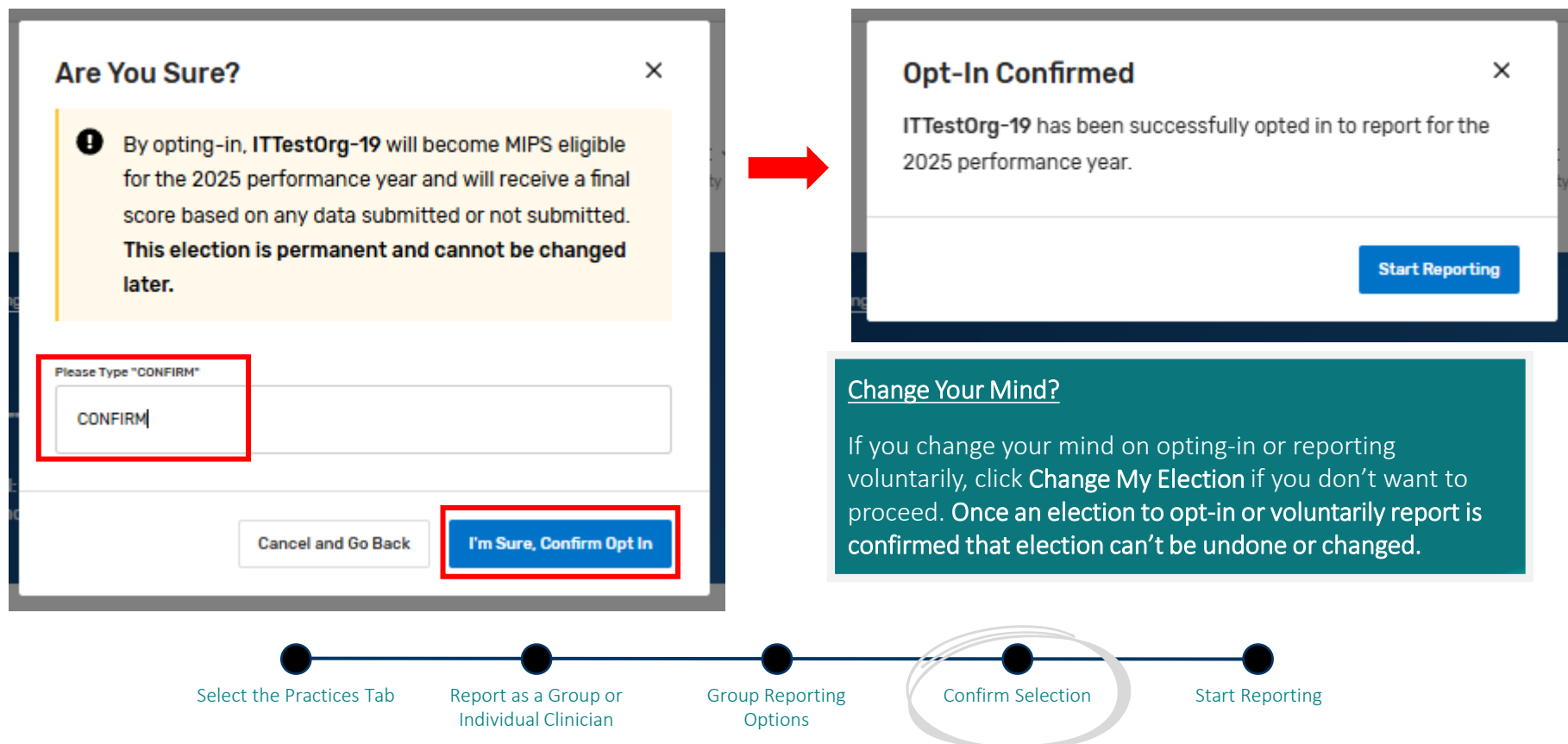
Cancel and Go Back



Step 4: Confirm Selection

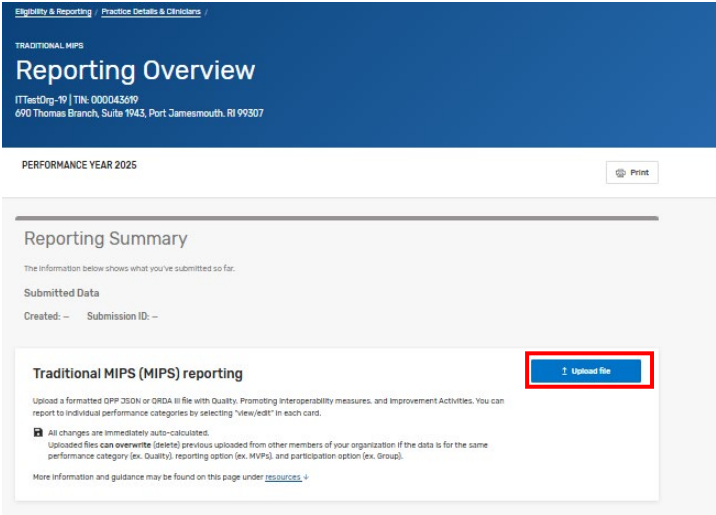
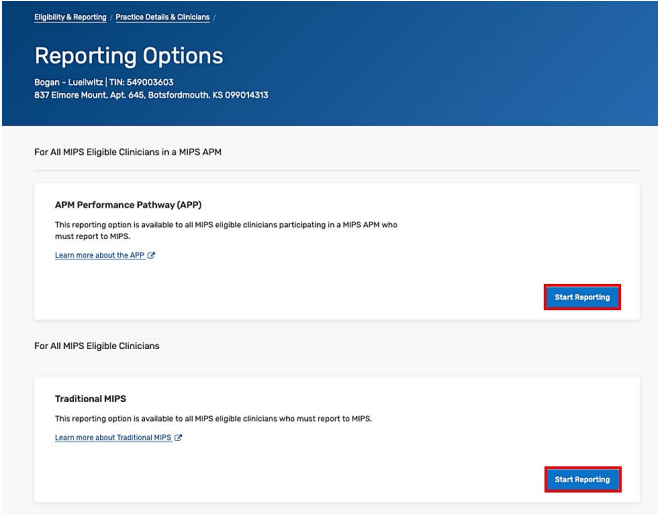
Verify your election by typing “CONFIRM” in the text field and clicking **I’m Sure, Confirm Opt In or I’m Sure, Report Voluntarily**.

Next, you will receive a message confirming your election and the option to **Start Reporting**.



Step 5: Start Reporting

Reminder: The submission period is January 2, 2026, to March 31, 2026.

REPORTING OVERVIEW	REPORTING OPTIONS (MIPS APM PARTICIPANTS ONLY)
Once you confirm your election, you'll be brought to the Reporting Overview page, where you can begin submitting data.	If you elected to opt-in, you'll be brought to the Reporting Options page where you'll be required to indicate if you're reporting traditional MIPS or the APP. As a reminder you can't voluntarily report the APP.
	

Select the Practices Tab

Report as a Group or Individual Clinician

Group Reporting Options

Confirm Selection

Start Reporting



Eligibility & Reporting Homepage

Participation Update on Eligibility & Reporting Homepage

After completing an election to opt-in at the **group level**, you'll see an **updated eligibility status** on the **Eligibility & Reporting** page.

ITTestOrg-19
TIN: #000043019 | 090 Thomas Branch Suite 1943, Port Jamesmouth, RI 02882

MIPS ELIGIBLE VIA OPT-IN

Exceeds Low Volume Threshold: No
Medicare Patients at this practice: 934,981
Allowed Charges at this practice: \$938,084.00
Covered Services at this practice: 351,070
Special Statuses, Exceptions and Other Reporting Factors: None

[View practice details & clinician eligibility >](#)

[Report as Group](#)
[Report as Individuals](#)

If you completed an opt-in election at the **individual level**, you'll see their **updated eligibility status** on the **Practice Details & Clinicians** page.

Karla Vičková at Bönisch UG
NPI: #1265831036 | Nurse Practitioner

MIPS Eligibility: **INDIVIDUAL VIA OPT-IN** **GROUP**

REPORTING REQUIREMENTS

This clinician is not required to report because they do not exceed the individual low-volume threshold. Because they exceed one or two elements of the low-volume threshold, however, they can opt-in to report as an individual. In either case, because the practice exceeds the low-volume threshold, if the practice reports as a group, the clinician's data will be included.

[View complete eligibility details](#)

[Report as individual](#)



QCDRs and Qualified Registries: Election Process

Step 1: Select the Registries Tab

Click on the **Registries** tab and review the qualified registries and/or QCDRs you are connected to. If you don't see a registry or QCDR that you should be connected with, please refer to the [QPP Access Guide \(ZIP, 5MB\)](#) for information on connecting to an organization.

The screenshot shows the Quality Payment Program interface. On the left is a dark blue sidebar with a list of navigation items: Account Home, Registration, Eligibility & Reporting (highlighted in red), Performance Feedback, APM Incentive Payments, Doctors & Clinicians Preview, Exceptions Application, Targeted Review, Reports, Manage Access, and Help and Support. The main content area has three tabs: Registries (highlighted with a red box), APM Entities, and Practices. Below the tabs is a search bar labeled 'Search' with the placeholder text 'Search by registry name' and a magnifying glass icon. Below the search bar, it says 'Showing 1 - 1 of 1 Registries'. A card displays 'Decision Population Health - QR' with 'TIN: 000616120' and a blue 'Start Reporting' button.



Step 2: Click Upload File(s)

Click **Upload File(s)** and upload a JavaScript Object Notation (QPP JSON) or Quality Reporting Document Architecture Extensible Markup Language (QRDA XML) file(s) that contain all or single category data for your clients.

The screenshot shows the 'Registry Submission Details' page for 'Decision Population Health-QR'. At the top, there is a breadcrumb 'Eligibility & Reporting /'. Below the title, there is a dropdown menu for 'Performance Year 2025' and a 'Print' button. The main section is titled 'Start Reporting' and contains instructions: 'Start by uploading a JSON that contains all or single category data. If you submit data using the submission API you will see the submissions on this page.' and a link to 'View Registry Instructions'. A blue button labeled '↑ Upload File(s)' is highlighted with a red rectangle. Below this is a button labeled 'ACCESS API TOKEN'. At the bottom, a horizontal timeline shows six steps: 'Select the Registries Tab', 'Click Upload File(s)' (circled in grey), 'Upload Data', 'Election Selection for Eligible Participants', 'Confirm Election Selection for Eligible Participants', and 'View Submission'.

Eligibility & Reporting /

Registry Submission Details

Decision Population Health-QR

Performance Year 2025 ▼

Print

Start Reporting

Start by uploading a JSON that contains all or single category data. If you submit data using the submission API you will see the submissions on this page.
[View Registry Instructions](#)

↑ Upload File(s)

ACCESS API TOKEN

Select the Registries Tab

Click Upload File(s)

Upload Data

Election Selection for Eligible Participants

Confirm Election Selection for Eligible Participants

View Submission



Step 3: Upload Data

Upload File

DRAG & DROP

Upload Data

Your JSON or QRDA III file here, or [browse](#).

File(s) to upload (9)

drClark.json	
drConners.json	
drDoom.json	
drOtto.json	
drParker.json	

[Cancel](#) [Upload File](#)

Accepted files to upload

This upload tool accepts properly formatted **JSON** and **QRDA III** files. Any files submitted are received and calculated immediately.

[Learn more](#)

After selecting Upload File(s), an **Upload Data** modal will populate. Upload your JSON or QRDA III file(s) via **drag and drop** or **browse** and attach file(s).

Select the Registries
Tab

Click Upload File(s)

Upload Data

Election Selection for
Eligible Participants

Confirm Election
Selection for Eligible
Participants

View Submission



Step 4: Election Selection for Eligible Participants

You'll see a list of all the opt-in eligible groups and clinicians included in the submission.

- **Individual clinicians** are identified by Taxpayer Identification Number and National Provider Identifier combination (TIN/NPI).
- **Groups** are identified by TIN.

You'll need to make an election for each TIN and TIN/NPI:

- **No Decision:** you don't want to continue with data upload for this participant (they will remain exempt unless an election is made later).
- **Report Voluntarily:** the clinician or group will not receive a payment adjustment based on data submitted.
- **Opt-In:** the clinician or group will receive a payment adjustment based on data submitted.

Once you complete your selection, click **Submit Elections**.

	Participant	No Decision	Report Voluntarily	Opt-in
TIN	000754342	☐	☒	☐
TIN	999159305	☐	☐	☒
TIN	000043560	☐	☐	☒
TIN	000010101	☐	☒	☐

Opt-In Eligible Participants

Participant Elections

No Decision 0
The clinician or group will not be uploaded and will remain MIPS Exempt.

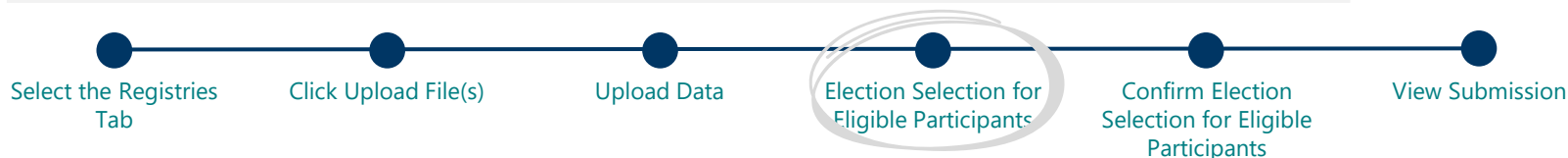
Report Voluntarily 2
The clinician or group will receive performance feedback but will not receive a payment adjustment in 2024. Voluntary reporting through the APM Performance Pathway (APP) isn't permitted

Opt-In 2
The clinician or group will receive performance feedback and a MIPS payment adjustment in 2024.

Submit Selections

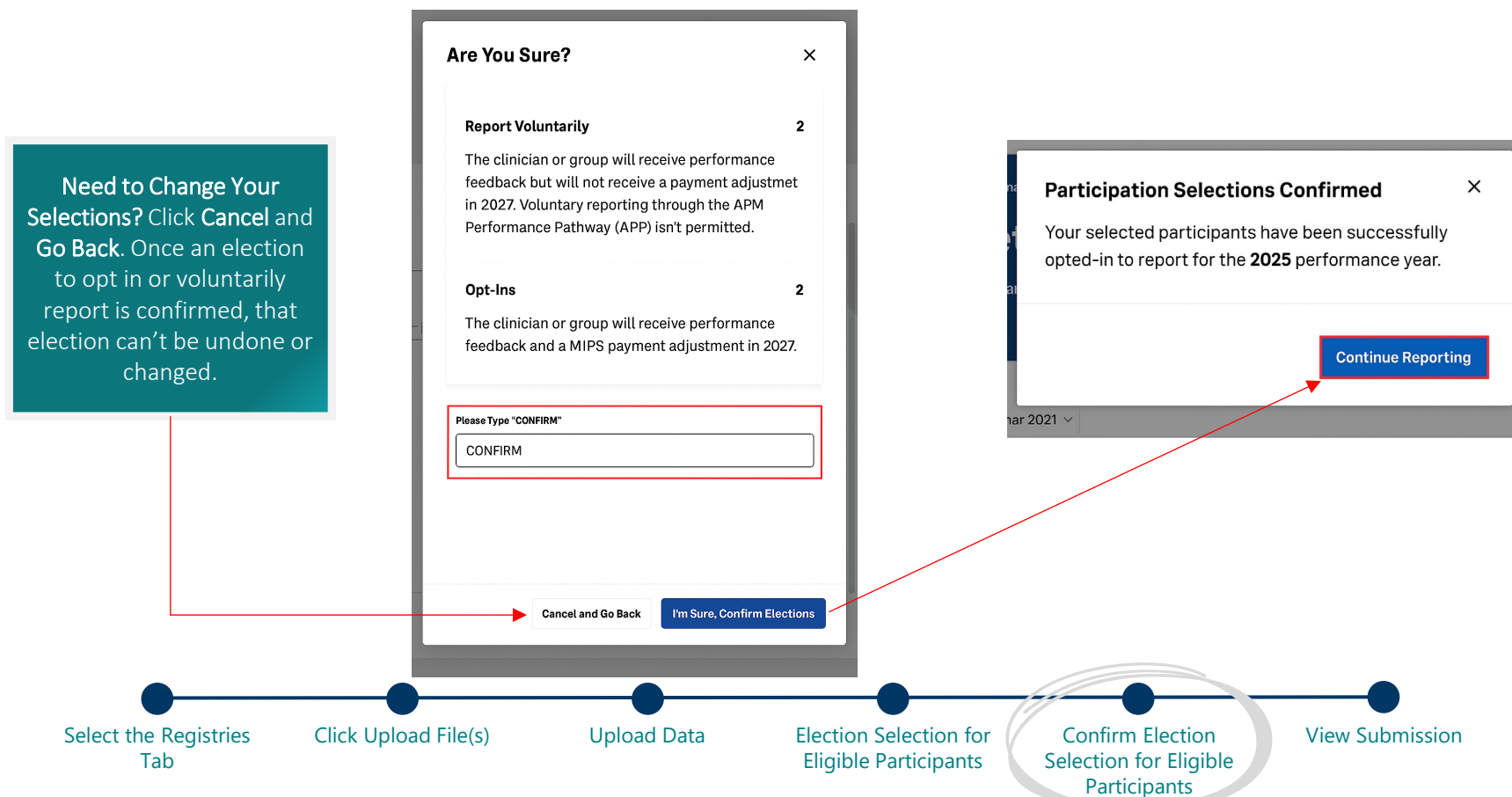
Cancel File Upload

Change Your Mind? You can click Cancel File Upload, which will cancel the entire upload (including data for those who are already MIPS eligible). Once an election to opt-in or voluntarily report is confirmed that election can't be undone or changed.



Step 5: Confirm Election Selection for Eligible Participants

Next, you will be asked to verify your selection for eligible participants. When prompted to confirm your selection, type **CONFIRM** and click **I'm Sure, Confirm Elections**. Then, you will receive a **confirmation message** and option to **Continue Reporting** after you click, **I'm Sure, Confirm Elections**.



Step 6: View Submission

After you click **Continue Reporting**, you'll receive confirmation that your file was successfully uploaded and can continue to view your submission data by clicking **View Submission** and will be brought to the **Registry Submission Details** page.

Upload File

☒ **Upload Successful**
Your files were successfully uploaded. You can now review your submitted data on the Overview and Category Details pages.

File(s) uploaded (1)

☒ starLabs.json

Uploading this file will **overwrite the submission data you've submitted**.
A maximum of 50 files can be processed in a single upload request.
Measure data that you've left blank will not be updated.

[Do you have an issue uploading your file?](#)
If you are having any issues uploading your files:
Need help? Contact Us.
qpp@cms.hhs.gov
1-866-288-8292

[Upload More](#) **View Submission**

If your file wasn't **successfully uploaded**, contact the [QPP Service Center](#).



Help and Version History

Where Can You Go for Help?

Contact the Quality Payment Program (QPP) Service Center by emailing QPP@cms.hhs.gov, creating a [QPP Service Center ticket](#), or calling 1-866-288-8292 (Monday through Friday, 8 a.m. - 8 p.m. ET). Please consider calling during non-peak hours, before 10 a.m. and after 2 p.m. ET.

- People who are hearing impaired 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](#).



Version History

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

DATE	DESCRIPTION
12/19/2025	Original Version.

