

# Quality Payment PROGRAM



## 2025 Merit-based Incentive Payment System (MIPS) At-A-Glance Reporting Options for Small Practices

To participate in MIPS, eligible clinicians must select one of the available reporting options to fulfill the [MIPS reporting requirements](#). This document provides a high-level comparison of the 3 MIPS reporting options for MIPS eligible clinicians in small practices. Small practices are practices with 15 or fewer clinicians. For a comprehensive review of the 3 MIPS reporting options, please refer to the [2025 MIPS Reporting Options Comparison Resource on the QPP Resource Library](#).

| Highlights                     | Traditional MIPS                                                                                                                                                                                                                                                                                                                                                                                       | MIPS Value Pathways (MVPs)                                                                                                                                                                                                                                                                                                                                                                                                             | Alternative Payment Model (APM) Performance Pathway (APP)                                                                                                                                                                                                                                                                                         |
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| <b>Why choose this option?</b> | <ul style="list-style-type: none"> <li>More choice in quality measure and improvement activity selection.</li> <li><a href="#">Traditional MIPS</a> is the original reporting option for collecting and reporting data to MIPS.</li> </ul>                                                                                                                                                             | <ul style="list-style-type: none"> <li>Streamlined, cohesive sets of measures and activities.</li> <li>Each MVP includes a subset of measures and activities that are related to a given specialty or medical condition. Visit the <a href="#">Explore MVPs</a> webpage to learn about the MVPs available for reporting.</li> <li><a href="#">MVPs</a> are the future of MIPS and will be required in future years.</li> </ul>         | <ul style="list-style-type: none"> <li>The <a href="#">APP</a> reporting option is a good choice for those participating in a MIPS APM who want streamlined reporting requirements.</li> </ul>                                                                                                                                                    |
| <b>How do I report?</b>        | <ul style="list-style-type: none"> <li>Collect and submit data by uploading files and manually attesting to reporting requirements.</li> <li>Work with a third-party intermediary (e.g., Qualified Clinical Data Registry (QCDR), qualified registry) to submit data on your behalf.</li> <li>You don't need to submit any data for administrative claims-based measures and cost measures.</li> </ul> | <ul style="list-style-type: none"> <li>Advance registration is required.</li> <li>Collect and submit data by uploading files and manually attesting to reporting requirements.</li> <li>Work with a third-party intermediary (e.g., QCDR, qualified registry) that supports an MVP relevant to you or your practice.</li> <li>You don't need to submit any data for administrative claims-based measures and cost measures.</li> </ul> | <ul style="list-style-type: none"> <li>Collect and submit data by uploading files and manually attesting to reporting requirements.</li> <li>Work with a third-party intermediary (e.g., QCDR, qualified registry) to submit data on your behalf.</li> <li>You don't need to submit any data for administrative claims-based measures.</li> </ul> |
| <b>Where do I submit data?</b> | <ul style="list-style-type: none"> <li>Sign in to the <a href="#">QPP website</a>, and select Start Reporting on the main page.</li> <li>Choose your <a href="#">participation option</a> (i.e., reporting as an individual or group).</li> <li>Select Start Reporting.</li> </ul>                                                                                                                     | <ul style="list-style-type: none"> <li>Sign in to the <a href="#">QPP website</a>, and select Start Reporting on the main page.</li> <li>Choose your <a href="#">participation option</a> (i.e., reporting as an individual or group).</li> <li>Select Start Reporting next to "MIPS Value Pathways".</li> </ul>                                                                                                                       | <ul style="list-style-type: none"> <li>Sign in to the <a href="#">QPP website</a>, and select Start Reporting on the main page.</li> <li>Choose your <a href="#">participation option</a> (i.e., reporting as an individual or group).</li> <li>Select Start Reporting next to "APM Performance Pathway".</li> </ul>                              |

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|                                                                  | (You won't see other reporting options unless you've registered for an MVP or participate in a MIPS APM and can report the APP.)                                                                                                                                                                                                                                                                                                                | (You'll only have the option to submit data for the MVP you registered for during the performance year.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | (You'll only have the option to submit data for the APP if you participate in a MIPS APM.)                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Performance Category Weighting for Small Practices</b>        | <ul style="list-style-type: none"> <li>Quality = 40%</li> <li>Cost = 30%   0% APM Entities</li> <li>Improvement Activities = 30%</li> <li>Promoting Interoperability = 0% (Automatically reweighted for small practices.)</li> </ul>                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>Quality = 40%</li> <li>Cost = 30%   0% APM Entities</li> <li>Improvement Activities = 30%</li> <li>Promoting Interoperability = 0% (Automatically reweighted for small practices.)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>Quality = 75%</li> <li>Cost = Not Applicable</li> <li>Improvement Activities = 25%</li> <li>Promoting Interoperability = 0% (Automatically reweighted for small practices.)</li> </ul>                                                                                                                                                                                                                                                                                                              |
| <b>Quality Category Highlights for Small Practices</b>           | <ul style="list-style-type: none"> <li>Small Practice Bonus.</li> <li>Quality performance category will be reweighted if there are no measures available to the clinician.</li> <li>Select 6 measures or an available specialty measure set; this includes one outcome measure or high-priority measure in the absence of an applicable outcome measure.</li> <li>Automatically evaluated on 4 administrative claims-based measures.</li> </ul> | <ul style="list-style-type: none"> <li>Small Practice Bonus.</li> <li>Quality performance category won't be reweighted for lack of relevant measures for a clinician.</li> <li>Select 4 measures from a limited set of MVP specific measures; this includes one outcome measure or high-priority measure in the absence of an available outcome measure; this can include an outcomes-based administrative claims measure (automatically calculated if selected during MVP registration). If reporting Medicare Part B claims measures and fewer than 4 measures are included in the MVP, you only need to report those measures instead of the 4 required.</li> <li>Automatically evaluated on a population health measure.</li> </ul> | <ul style="list-style-type: none"> <li>Small Practice Bonus.</li> <li><a href="#">Report 3 measures required under the APP quality measure set OR report 4 measures under the APP Plus quality measure set.</a> (Medicare SSP ACOs must report the APP Plus Quality Measure set).</li> <li>Administer the <a href="#">Consumer Assessment of Healthcare Providers and Systems (CAHPS) for MIPS Survey</a> (required for APP reporting).</li> <li>Automatically evaluated on the available administrative claims-based measures.</li> </ul> |
| <b>Improvement Activities Highlights for Small Practices</b>     | <ul style="list-style-type: none"> <li>Select (from over 100 activities) and perform 1 improvement activity OR participate in a recognized or certified patient-centered medical home or comparable specialty practice.</li> <li>Group, virtual group or APM Entity reporting: 50% of the clinicians must perform the same activity for a continuous 90-day period (but don't have to perform the activity concurrently).</li> </ul>            | <ul style="list-style-type: none"> <li>Select (from the activities available within the MVP) 1 improvement activity OR participate in a recognized or certified patient-centered medical home or comparable specialty practice.</li> <li>Group, subgroup or APM Entity reporting: 50% of the clinicians must perform the same activity for a continuous 90-day period (but don't have to perform the activity concurrently).</li> </ul>                                                                                                                                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>No reporting is required.</li> <li>Automatically receive full credit.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Promoting Interoperability Highlights for Small Practices</b> | <ul style="list-style-type: none"> <li>Small practices aren't required to report data for this performance category but can choose to report the complete set of required measures and attestations to be scored on this performance category.</li> </ul>                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>Small practices aren't required to report data for this performance category but can choose to report the complete set of required measures and attestations to be scored on this performance category.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <ul style="list-style-type: none"> <li>Small practices aren't required to report data for this performance category but can choose to report the complete set of required measures and attestations to be scored on this performance category.</li> </ul>                                                                                                                                                                                                                                                                                  |
| <b>Cost Highlights for Small Practices</b>                       | <ul style="list-style-type: none"> <li>No reporting is required. You'll be scored on each of the 35 MIPS cost measures for which you meet case minimum, based on Medicare claims data.</li> <li>Reweightings are applied when the clinician or group can't be scored on any of the 35 MIPS cost measures.</li> </ul>                                                                                                                            | <ul style="list-style-type: none"> <li>No reporting is required. You'll be scored on each cost measure(s) in your selected MVP for which you meet case minimum, based on Medicare claims data.</li> <li>Reweightings are applied when the clinician or group can't be scored on any of the cost measures included in the selected MVP.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>Not applicable.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |