

Radiologists Look for MIPS Overhaul

The American College of Radiology (ACR) and Radiology Business Management Association (RBMA) are encouraging CMS to make changes to the MIPS program. The most recent change, which raised the performance threshold from 75 to 82 points in 2024, will lead to more providers not being able to reach the 82 points. These changes will in turn subject these providers who can't reach 82 points or more to a penalty.

Radiologists already struggle with the program and most are unable to earn the maximum incentive adjustment assigned to the MIPS outcomes. There are barriers with the MIPS program that include topped out quality measures for non-patient facing physicians. This has led the ACR to oppose CMS' proposal to raise the point threshold to 82 points.

The College's CEO, Dr. William Thorwarth, Jr. wrote to CMS "It is important to acknowledge that due to the declining measure availability and an increased fraction of topped out measures for some specialties, such as radiology, as well as the removal of bonus points, there is not equivalency between past and present years." He also added, "As a result, past performance is not reflective of the current challenges. We thus strongly urge CMS to use the flexibility provided in the statute to maintain the threshold until these issues are successfully addressed."

While CMS has indicated that it plans to sunset the MIPS program in favor of alternatives, no timeline has been released. The ACR has stated, "we encourage CMS to commit to not sun setting MIPS until there is an option available which is viable to all specialties."

Meanwhile, the RBMA has voiced their concern as well. They are extremely concerned about the financial impact on radiology practices. The concerns include: re-implementing cost measures for the 2022 performance period, no meaningful opportunities for radiologists to impact performance, no cost data since 2019 and no interim reporting available during the performance year that would allow physicians to gauge how they are performing.

Radiologist Richard Heller, MD, MBA has also outlined the flaws in MIPS. Dr. Heller is urging Congress to consider eliminating the program, or at minimum pausing the program until an alternative approach is developed.

Please feel free to contact your Practice Manager if you have any questions on this publication.