

PUBLICATION

Will Physicians Accept CMS's Offer to "Pick Your Pace"? [Ober|Kaler]

2016

The Acting CMS Administrator, Andy Slavitt, announced that CMS would propose new options for physician participation in the Quality Payment Program (QPP) under the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA). These new options, coined as "Pick Your Pace" in The CMS Blog, respond to feedback and criticism provided by physicians and other clinicians. Physicians and other clinicians should expect some changes to their participation options for the QPP final rule, **which CMS plans to publish prior to November 1, 2016.**

Assuming that Pick Your Pace remains unchanged, physicians will be able to choose simpler options instead of 100% participation in the QPP. These options include:

1. Test participation by submitting some data to the QPP, including data from after January 1, 2017;
2. Participate in QPP for part of the 2017 calendar year;
3. Participate in QPP for the entire 2017 calendar year; or
4. Participate in an Advanced Alternative Payment Model in 2017.

Ober|Kaler's Comments

CMS has tempered its position towards participation in the QPP. As originally introduced in the QPP proposed rule, CMS required the 100% participation of physicians and other clinicians in the QPP under either the Merit-Based Incentive Payment System or the Advanced Alternative Payment Model, as further discussed in our previous [article](#) on the proposed rule.