

Understand 2019 Payments for MIPS 2017 Performance Year-Providers Changing/Changed Practices

September 05, 2018

With 2018 being in its last half, questions are coming up about MIPS payment adjustments in 2019 based on the 2017 performance year. One topic of interest is what happens if a clinician moved from one practice to another. Here is an answer, straight from the [CMS Fact Sheet](#) on 2019 MIPS payment adjustments based on 2017 scores.

Know What Happens When There's a New TIN

The scenario the Fact Sheet provides is that a doctor (Dr. Delta) received a 2017 MIPS final score assigned to the **TIN (Taxpayer Identification Number)** of the practice she billed under at the time. Dr. Delta changed practices, which means that in 2019 she will be billing under a different practice's TIN (not the TIN she billed under in 2017).

The Fact Sheet indicates that, because Dr. Delta does not have a 2017 MIPS final score tied to her 2019 TIN/NPI combination, CMS will assign the 2017 MIPS final score associated with her NPI to the doctor and will adjust Medicare payments to her new 2019 TIN/NPI combination based on that score. So, in short, the payment adjustments follow the provider.

Watch out: In some cases, providers bill under TINs of multiple practices. If Dr. Delta had several MIPS 2017 final scores connected to her NPI because she had one score per TIN/practice from 2017, then CMS would assign the highest score to Dr. Delta for MIPS payment year 2019.

Tip: The information above applies in cases where a TIN is new because of a change of practice or because the provider established a new TIN.

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Two Quick Tips on TINs and 2017

The previous section referred to situations where providers bill under multiple group TINs. Even if the TIN/NPI didn't change, you may wonder how CMS will handle payment adjustments in that situation. Per the Fact Sheet, Medicare will adjust the payment for each 2019 covered Part B service based on the final 2017 score for the relevant TIN/NPI combination.

And as one final tip, providers who joined a practice late in 2017 may be asking how that affects their 2019 payments. According to the Fact Sheet, an individual clinician who started billing to a group's TIN between Sept. 1, 2017, and Dec. 31, 2017, will get a neutral payment adjustment in 2019 for that TIN.