

## All-Payer Clinician Initiated Submission Form CY 2020 Final versus CY 2021 Proposed

**Burden impact:** The changes to this form reflect proposals in the CY2021 Physician Fee Schedule (PFS) Proposed Rule for the Quality Payment Program. There are no impacts to burden as a result of these changes.

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**Change #1:**

**Location:** Page 1, Line 39

**Reason for Change:**

Alignment with current year.

**CY 2020 Final Rule text:**

2019

**CY 2021 Proposed Rule text:**

2020

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**Change #2:**

**Location:** Page 1, Line 42

**Reason for Change:**

Alignment with current year.

**CY 2020 Final Rule text:**

December 1, 2019 for the 2019

**CY 2021 Proposed Rule text:**

December 1, 2020 for the 2020

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**Change #3:**

**Location:** Page 2, Line 9

**Reason for Change:**

Alignment with current year.

**CY 2020 Final Rule text:**

2018 for the 2019

**CY 2021 Proposed Rule text:**

2019 for the 2020

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**Change #4:**

**Location:** Page 3, Line 8

**Reason for Change:**

Edited for clarity

**CY 2020 Final Rule text:**

Additional information regarding electronic Form access and submission process will be available following publication of the 2018 Quality Payment Program Final Rule.

In addition to APM Entities and Eligible Clinicians, we allow those authorized to report on behalf of APM Entities or Eligible Clinicians to complete this Form.

**CY 2021 Proposed Rule text:**

We allow those authorized to report on behalf of APM Entities or Eligible Clinicians to complete this Form.

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**Change #5:**

**Location:** Page 9, Line 6

**Reason for Change:**

Alignment with current year and proposed changes.

**CY 2020 Final Rule text:**

For performance year 2020, is the total amount that your participating entity potentially owes or foregoes under the payment arrangement at least 4 percent of the average estimated total revenue of all the participating providers or other entities under the payer? [Y/N]

If yes, please describe how the amount that an APM entity owes or foregoes is calculated. [Text Box]

**CY 2021 Proposed Rule text:**

For performance year 2021 and later, is the total amount that your participating entity potentially owes or foregoes under the payment arrangement at least at least 5 percent of the average estimated total revenue of the participating providers or other entities under the payer in 2021? [Y/N]

If yes, please describe how the amount that an APM entity owes or foregoes is calculated. [Text Box]

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**Change #6:**

**Location:** Page 9, Line 11

**Reason for Change:**

Edited for clarity.

**CY 2020 Final Rule text:**

2

**CY 2021 Proposed Rule text:**

1

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**Change #7:**

**Location:** Page 9, Line 19

**Reason for Change:**

Edited for clarity.

**CY 2020 Final Rule text:**

3

**CY 2021 Proposed Rule text:**

2