

Application to Use Burden/Hours from Generic PRA Clearance:  
Quality Payment Program/Merit-Based Incentive Payment System (MIPS) Surveys and  
Feedback Collections (OMB 0938-1399)

**Non-participating Small and Solo Practice Survey**

Quality Payment Program  
Centers for Medicare & Medicaid Services (CMS)

## A. Background

Clinicians and practices become eligible for payment adjustments through the Merit-based Incentive Payment System (MIPS) based on their annual Medicare billing. If clinicians individually or the practices where they work meet the MIPS Low Volume Threshold (LVT), they must report data to QPP for scoring in order to determine a payment adjustment on future billing. If a clinician or practice does not submit data, they face a 9% payment reduction to their future billing for each performance year of non-participation. Historically, small practices, which QPP policy defines as a practice with fewer than 15 clinicians, make up a disproportionate number of nonparticipants. Of those nonparticipating small practices, many include just one clinician. MIPS is a budget neutral program that provides higher billing rates for participating clinicians and practices that achieve high scores which is funded through a pool of negative payment adjustments taken from lower performing and non-participating clinicians. There is concern that the program is rewarding high performing practices that possess greater funds and resources at the expense of small practices that are already financially challenged. The goal of this survey is to better understand the reasons for nonparticipation among this targeted group in order to develop better policies and systems to bring these clinicians back into the program.

## B. Description of Information Collection

The survey will collect demographic information and a series of questions about user preference, comprehension, and satisfaction. The survey will be a combination of multi-select responses and open text fields. The survey will be created in Qualtrics, a FedRAMP approved platform, which will include logic that only displays questions to users that are relevant to their experience based on their prior responses. Respondents will be given the option to provide their name and contact information at the end of the survey if they wish to join a pool for future feedback opportunities. Providing names and contact information is not required for participation in this survey.

The survey will be distributed via email through Qualtrics linked to the QPP User Research CMS email address. The survey is designed to take fewer than 10 minutes to complete.

## C. Deviations from Generic Request

No deviations are requested.

## D. Burden Hour Deduction

We anticipate up to 1,000 responses for 2024. The total approved burden ceiling of the generic ICR for HCD User Satisfaction/Product Usage/Benchmarking Surveys is 7,500 hours. Up until now, 1,626 hours of this allotment have been approved for other surveys. We are requesting a total deduction of 83 hours from the approved burden ceiling (1000 participants x 0.0833 hours = 83 hours).

Title	Respondents	Responses	Time per response	Burden Hours
QPP Small and Solo Practice Survey	1000	1000	0.0833	83

### **E. Timeline**

QPP seeks to solicit responses Summer 2024

The following attachment is provided for this information collection:

- Non-participating Small and Solo Practices Survey Instrument