

MIPS Value Pathways (MVP) For Radiology

There are three things a radiologist needs to know about MVPs in 2026. First, they are less work than traditional MIPS. Second, you may earn more money over traditional MIPS. Third, they are optional.

The following document will provide an overview of MIPS Value Pathways (MVP) program and an explanation as to how it applies to radiologists.

Overview:

MIPS Value Pathways are the newest reporting option to fulfill MIPS reporting requirements under the Medicare Merit-based Incentive Payment System (MIPS).

Key Features:

<u>Purpose & Design:</u> The MVP framework is intended to ease the reporting burden on clinicians and groups by aligning measures and activities across the Quality, Cost, and Improvement Activities performance categories. CMS defined MVPs as "a subset of measures and activities, established through rule making, that can be used to meet MIPS reporting requirements."

<u>Scope:</u> MVPs are composed of quality measures (including one outcome measure, or high-priority measure, if the outcome measure isn't applicable), improvement activities, and cost measures that are connected and relevant to specific specialties, conditions, or patient populations.

<u>Current Availability:</u> There are 21 MVPs available for the 2025 performance year, and 6 new MVPs proposed for 2026.

<u>Performance Requirements:</u> Like traditional MIPS, the MIPS performance threshold will remain at 75 points for the 2026 performance period to avoid negative payment adjustments.

<u>Timeline:</u> The 2026 performance year is the fourth year MVPs are available as a voluntary MIPS participation pathway. They were first introduced in 2023 as an alternative to traditional MIPS reporting.

MVPs represent CMS's effort to create more cohesive, specialty-specific reporting pathways that connect quality measures, improvement activities, and cost measures around common clinical themes, making MIPS reporting more meaningful and less burdensome for healthcare providers.

MIPS for Radiology

There will be two MVPs for radiologists, one for Diagnostic Radiology and another for Interventional Radiology. While MVPs have components for quality, cost and improvement activities, the most impactful and manageable component is quality.

Each MVP contains a specific (limited) set of quality measures. But that limitation is less constraining than its first impression. There are no new measures, and the MVP measure sets are what most radiologists will report and manage via traditional MIPS. What makes less effort and potentially more money is that MVP only evaluates your top 4 measures rather than your top 6 as in traditional MIPS.

Refer to Table 1 and 2 for a list of measures, by category, for these two MVPs.

So, here are the mechanics:

- 1. It is prudent to read through the list of quality measures in the MVP and make sure you have a good set of 4.
- 2. You can submit both MVP and Traditional MIPS, and CMS will give you the higher of the two. In fact, you can submit both Diagnostic MVPs and Interventional MVP, as long as you have at least 20 cases in at least 4 measures in each set. It is not necessary that all your providers contribute to each measure under group submission, or even that they are credentialed into either diagnostic or interventional radiology.
- 3. To calculate the implication of MVP on your MIPS overall score follow this simple exercise:
 - a. Add up the MIPS scores of your top six quality measures. Divide by 60. This gives your traditional MIPS Quality score.
 - b. If your top six (or top 4) measures are in the MVP you select, add up the MIPS scores of the top 4. Divide by 40. This gives you your MVP quality score.
 - Your IA score will be the same under both scenarios, as long as the IA measure you select is from the MVP set.

- 4. MVPs limit your selection of Improvement Activities, but you only need one. If your selected IA is in the MVP set, there is no difference to you.
- 5. MVP can save you on the cost category as well. If you have been attributed a cost score under traditional MIPS there will be one or more cost measures included. MVPs limit the cost measures allowable, so you will only be scored on the cost measure(s) included in the MVP.
- 6. You must pre-register to submit a 2026 MVP, by December 1, 2025.
- 7. If you submit both traditional MIPS and MVP, there is no downside to the MVP submission.

There are many more details to MVPs, most of which are administrative, and add almost no extra work. If you are ready to explore how MVPs can benefit your practice, our MIPS consultants are available to discuss this with you. Contact us at info@guidanceanalytics.com

Table 1- Diagnostic Radiology

Clinical Grouping	Quality Measure	Cost	Improvement Activity
General Diagnostic Radiology	Q145: Radiology: Exposure Dose Indices Reported for Procedures Using Fluoroscopy Q360: Optimizing Patient Exposure to Ionizing Radiation: Count of Potential High Dose Radiation Imaging Studies: Computed Tomography (CT) and Cardiac Nuclear Medicine Studies Q494: Excessive Radiation Dose or Inadequate Image Quality for Diagnostic Computed Tomography (CT) in Adults (Clinician Level)	MSPB_1: Medicare Spending Per Beneficiary (MSPB) Clinician	 IA_BE_6: Regularly Assess Patient Experience of Care and Follow Up on Findings (!) IA_BMH_12: Promoting Clinician Well-Being IA_CC_7: Regular training in care coordination IA_CC_8: Implementation of documentation improvements for practice/process improvements IA_CC_12: Care coordination agreements that promote improvements in patient tracking across settings IA_CC_19: Tracking of clinician's relationship to and responsibility for a patient by reporting MACRA patient relationship codes (**) IA_MVP: Practice-Wide Quality Improvement in MIPS Value Pathways IA_PSPA_1: Participation in an AHRQ-listed patient safety organization IA_PSPA_2: Participation in MOC Part IV IA_PSPA_7: Use of QCDR data for ongoing practice assessment and improvements IA_PSPA_12: Participation in private payer CPIA
Body Imaging (Thoracic/Abdominal)	Q364: Optimizing Patient Exposure to Ionizing Radiation: Appropriateness: Follow-up CT Imaging for Incidentally Detected Pulmonary Nodules According to Recommended Guidelines Q405: Appropriate Follow-up Imaging for Incidental Abdominal Lesions Q406: Appropriate Follow-up Imaging for Incidental Thyroid Nodules in Patients QMM17: Appropriate Follow-up Recommendations for Ovarian- Adnexal Lesions using the Ovarian-Adnexal Reporting and Data System (O-RADS)	N/A	
Advancing Health and Wellness	QMM18: Use of Breast Cancer Risk Score on Mammography QMM26: Screening Abdominal Aortic Aneurysm Reporting with Recommendations	MSPB_1: Medicare Spending Per Beneficiary (MSPB) Clinician	

Table 2- Interventional Raeiologuy

Interventional Radiology MVP				
Clinical Grouping	Quality Measure	Cost	Improvement Activity	
Vascular	Q420: Varicose Vein Treatment with Saphenous Ablation: Outcome Survey : Varicose Vein Treatment with Saphenous Ablation: Outcome Survey Q421: Appropriate Assessment of Retrievable Inferior Vena Cava (IVC) Filters for Removal : Appropriate Assessment of Retrievable Inferior Vena Cava (IVC) Filters for Removal Q465: Uterine Artery Embolization Technique: Documentation of Angiographic Endpoints and Interrogation of Ovarian Arteries	MSPB_1: Medicare Spending Per Beneficiary (MSPB) Clinician	 IA_BE_1: Use of certified EHR to capture patient reported outcomes IA_BE_4: Engagement of Patients through Implementation of New Patient Portal IA_BE_12: Use evidence-based decision aids to support shared decision-making (*)(!) IA_BE_26: Promote Use of Patient-Reported Outcome Tools (!) IA_BMH_12: Promoting Clinician Well-Being IA_CC_7: Regular training in care coordination IA_CC_8: Implementation of documentation improvements for practice/process improvements (!) IA_CC_9: Implementation of practices/processes for developing regular individual care plans IA_CC_15: PSH Care Coordination IA_CC_17: Patient Navigator Program IA_CC_19: Tracking of clinician's relationship to and responsibility for a patient by reporting MACRA patient relationship codes IA_EPA_2: Use of telehealth services that expand practice access IA_EPA_3: Collection and use of patient experience and satisfaction data on access (*)(!) IA_EPA_8: Provide Education Opportunities for New Clinicians 	
Dialysis-Related	RCOIR12: Tunneled Hemodialysis Catheter Clinical Success Rate RCOIR13: Percutaneous Arteriovenous Fistula for Dialysis - Clinical Success Rate RPAQIR14: Arteriovenous Graft Thrombectomy Clinical Success Rate RPAQIR15: Arteriovenous Fistulae Thrombectomy Clinical Success Rate	MSPB_1: Medicare Spending Per Beneficiary (MSPB) Clinician COST_HAC_1: Hemodialysis Access Creation		
Neurological Intervention	Q413: Door to Puncture Time for Endovascular Stroke Treatment	MSPB_1: Medicare Spending Per Beneficiary (MSPB) Clinician COST_IHCI_1: Intracranial Hemorrhage or Cerebral Infarction		
General Interventional Radiology	Q145: Radiology: Exposure Dose Indices Reported for Procedures Using Fluoroscopy	MSPB_1: Medicare Spending Per Beneficiary (MSPB) Clinician	 (**) IA_MVP: Practice-Wide Quality Improvement in MIPS Value Pathways IA_PM_17: Participation in Population Health Research IA_PSPA_1: Participation in an AHRQ-listed patient safety organization. IA_PSPA_18: Measurement and improvement at the practice and panel level IA_PSPA_25: Cost Display for Laboratory and Radiographic Orders 	
	Q374: Closing the Referral Loop: Receipt of Specialist Report	COST_HAC_1: Hemodialysis Access Creation		