

February 28, 2018

Molly MacHarris  
Program Lead, Merit-Based Incentive Payment System  
Center for Clinical Standards and Quality  
Center for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, Maryland 21244-1850  
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Dear Ms. MacHarris:

I am writing to you on behalf of members of the National Association of Social Workers (NASW), the largest and oldest professional social work organization in the United States with a membership of 120,000.

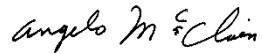
The National Association of Social Workers appreciates the discussion that occurred on February 16, 2018 regarding non-physician provider participation in the Merit-Based Incentive Payment System (MIPS) between your office and a group of non-physician provider organizations. As a follow up to that discussion, NASW would like to confirm our members' desire to participate in MIPS beginning in 2019 and to provide comment on three elements of the program to promote success for clinical social workers.

1. NASW supports maintaining the low threshold exemption for clinical social workers. However, for those meeting the low threshold exemption a voluntary reporting opportunity is desired. Clinical social workers who voluntarily report MIPS quality measures would be eligible for an incentive payment as a way to promote quality and value of services in small practices.
2. The NASW requests that the standard MIPS formula be reconsidered as the evaluation tool for clinical social workers. There are a limited number of measures related to mental and behavioral health care for clinical social workers to report and not all measures are relevant to every practice. This puts clinical social workers at a disadvantage to successfully participate in MIPS and increases the likelihood of negative penalty payments. NASW has advocated on behalf of members related to difficulties in reporting under PQRS and is concerned that similar barriers will remain in MIPS without adjustment of the standard formula.

3. NASW members have expressed concerns about participation in virtual groups. Many clinical social workers who will be participating in MIPS are in solo private practices. Establishment of virtual groups where the reporting of measures and subsequent incentive and negative penalty payments are contingent on the work of others is not desired.

Thank you for your attention to this matter. If you have any questions please feel free to contact the NASW at [naswceo@socialworkers.org](mailto:naswceo@socialworkers.org), Mirean Coleman at [mcoleman.nasw@socialworkers.org](mailto:mcoleman.nasw@socialworkers.org), or Yael Silverman at [ysilverman.nasw@socialworkers.org](mailto:ysilverman.nasw@socialworkers.org).

Sincerely,



Angelo McClain, PhD, LICSW  
Chief Executive Officer