



## Quality Payment PROGRAM



### **CMS to Apply MIPS Extreme and Uncontrollable Circumstances Policy for the 2020 Performance Period in Response to COVID-19; Reopens Application**

CMS continues to offer flexibilities to provide relief to clinicians responding to the 2019 Coronavirus (COVID-19) pandemic. We are applying the [MIPS automatic extreme and uncontrollable circumstances \(EUC\) policy](#) to all MIPS eligible clinicians for the 2020 performance period. We are also **reopening** the [MIPS EUC application](#) for individual MIPS eligible clinicians, groups, virtual groups, and Alternative Payment Model (APM) Entities through March 31, 2021 at 8 p.m. ET. **Please note that applications received between now and March 31, 2021 won't override previously submitted data for individuals, groups and virtual groups.**

**This listserv will review what these flexibilities mean for:**

- Individual clinicians, groups, and virtual groups that haven't submitted data;
- Individual clinicians, groups, and virtual groups that have submitted data; and
- APM Entities.

**Individual clinicians, groups, and virtual groups that haven't submitted data.**

- **Individual MIPS eligible clinicians:** You don't need to take any additional action to qualify for the automatic EUC policy. You will be automatically identified and will receive a neutral payment adjustment for the 2022 MIPS payment year unless 1) you submit data as an individual in 2 or more performance categories, or 2) your practice reports as a group, by submitting data for one or more performance category.
- **Groups:** You don't need to take any further action if you're not able to submit data for the 2020 performance period. Group participation is optional, and your individual MIPS eligible clinicians qualify for the automatic EUC policy. They will have all 4 performance categories reweighted to 0% and receive a neutral payment adjustment for the 2022 MIPS payment year unless 1) they submit data in 2 or more performance categories as individuals, or 2) the practice reports as a group, by submitting data for one or more performance category.
- **Virtual Groups:** If you're unable to submit data for the 2020 performance period, **you must submit an EUC application for all 4 performance categories by the deadline.**

**Individual clinicians, groups, and virtual groups that have submitted data.**

- **Individual MIPS eligible clinicians that have submitted data for a single performance category (such as Medicare Part B Claims measures submitted throughout the 2020 performance period):**
  - You don't need to take any additional action to be eligible for the automatic EUC policy.
  - You'll be automatically identified and have all 4 performance categories reweighted to 0% and will receive a neutral payment adjustment for the 2022 MIPS payment year unless 1) you submit data for another performance category, or 2) your group submits data for one or more performance category.
- **Individual MIPS eligible clinicians that have submitted data as an individual for 2 or 3 performance categories:**
  - You'll receive a MIPS final score and MIPS payment adjustment for the 2022 MIPS payment year based on the data you've submitted.
  - You'll only be scored in the performance categories for which data are submitted.
  - **You can't submit an application to override previously submitted data.**
- **Groups and virtual groups that have submitted data for a single performance category:**
  - If you're not able to complete data submission for other performance categories, you can [submit an application](#) to request reweighting in all 4 performance categories.
  - **This includes small practices that were automatically scored as a group on Medicare Part B Claims measures submitted throughout the 2020 performance period.**
  - If you don't submit an application, your group will be scored in all performance categories unless you are eligible for reweighting in one or more performance categories.
  - If your application is approved and data isn't submitted for another performance category, your MIPS eligible clinicians will receive a neutral payment adjustment for the 2022 MIPS payment year.
- **Groups and virtual groups that have submitted data for 2 or 3 performance categories:**
  - Your MIPS eligible clinicians will receive a MIPS final score and MIPS payment adjustment for the 2022 MIPS payment year.
  - Your group will be scored in all performance categories unless you qualify for reweighting in one or more performance categories.
  - **You can't submit an application to override previously submitted data.**

## APM Entities

APM Entities participating in MIPS APMs can submit an [EUC application](#) with some differences from the MIPS EUC policy for individuals, groups, and virtual groups:

- APM Entities are required to request reweighting for all performance categories.
- More than 75% of the MIPS eligible clinicians in the APM Entity must be eligible for reweighting in the Promoting Interoperability performance category.
- Unlike applications for individuals, groups and virtual groups, an APM Entity's approved application for performance category weighting **will** override previously submitted data.

Please note that if an APM Entity doesn't report for the 2020 performance period (or doesn't have an approved EUC application), their MIPS eligible clinicians will receive a negative payment adjustment in the 2022 payment year.

#### **Additional Resources**

- [2020 MIPS Extreme and Uncontrollable Circumstances Application Resources](#)
- [Quality Payment Program COVID-19 Response fact sheet](#)

For more information, please see the [Quality Payment Program COVID-19 Response webpages](#) of the QPP website. You can contact the Quality Payment program at 1-866-288-8292 (TRS: 711), Monday through Friday, 8:00 AM-8:00 PM ET or by e-mail at: [QPP@cms.hhs.gov](mailto:QPP@cms.hhs.gov).

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