

Quality Payment Program – COVID-19 Response

The Centers for Medicare & Medicaid Services (CMS) has extended the 2019 Merit-based Incentive Payment System (MIPS) data submission deadline from March 31 by 30 days to **April 30, 2020** to provide relief to clinicians responding to the 2019 Novel Coronavirus (COVID-19) pandemic. In addition, the MIPS automatic extreme and uncontrollable circumstances policy will apply to MIPS eligible clinicians who do not submit their MIPS data by the April 30, 2020 deadline.

Frequently Asked Questions

What Is the MIPS automatic extreme and uncontrollable circumstances policy?

Beginning with the 2017 performance period,¹ we established an automatic extreme and uncontrollable circumstances policy in MIPS for clinicians affected by natural disasters and emergencies. Clinicians affected by these extreme and uncontrollable circumstances may have their performance categories reweighted and potentially receive a neutral payment adjustment.

What does the MIPS automatic extreme and uncontrollable circumstances policy for COVID-19 mean for me in the 2019 performance period?

CMS has determined that the MIPS automatic extreme and uncontrollable circumstances policy will apply to MIPS eligible clinicians who do not submit their 2019 MIPS data **by the April 30, 2020 extended deadline**.

If you are a MIPS eligible clinician and do not submit any MIPS data by April 30, 2020, you won't need to take any additional action to qualify for the automatic extreme and uncontrollable circumstances policy. You will be automatically identified and will receive a neutral payment adjustment for the 2021 MIPS payment year.

If no MIPS eligible clinicians in an Alternative Payment Model (APM) Entity submit data for the Promoting Interoperability or Quality performance categories due to extreme and uncontrollable circumstances, the Cost performance category will be weighted at zero percent as usual and the Improvement Activities performance category will be scored as usual, but the APM Entity will be eligible to have the Promoting Interoperability and Quality performance categories reweighted to zero percent in accordance with §§ 414.1370 and 414.1375. If only one performance category (Improvement Activities) is scored, this would result in a neutral MIPS payment adjustment for MIPS eligible clinicians in the APM Entity.

Note: Many MIPS eligible clinicians who submitted data in previous years received high scores in MIPS. MIPS eligible clinicians who submit data by April 30, 2020 on 2 or more performance categories will be scored on those categories and receive a 2021 MIPS payment adjustment based on their 2019 MIPS final score.

¹ § 82 FR 53895 through 53900

How does this affect my 2019 final score and 2021 payment adjustment?

You will automatically receive a final score equal to the performance threshold, which will result in a neutral payment adjustment (neither a positive nor a negative adjustment) on covered professional services furnished in the 2021 MIPS payment year **unless**:

- You submit data as an individual for 2 or more MIPS performance categories (Quality, Improvement Activities, and/or Promoting Interoperability); or
- You are part of a group that submits data on behalf of its clinicians.

For a more detailed explanation of how your performance categories will be reweighted, please see [Appendix A](#).

Under the automatic extreme and uncontrollable circumstances policy, **the Cost performance category will always be weighted at 0%**, even if you submit data for the other performance categories.

What if our practice submitted data as a group?

If you are in a group that submits data on behalf of its clinicians, we will score the group in all performance categories according to existing MIPS scoring policies. You will receive a final score and payment adjustment based on the group's reporting. The Cost performance category will always be weighted at 0%, even if you submit data for the other performance categories. If your group does not submit any data by April 30, 2020 and you do not submit any data as an individual, you will receive a neutral payment adjustment for the 2021 MIPS payment year.

What does this mean for the 2020 performance period?

At this time, CMS hasn't issued guidance about the potential impact COVID-19 may have on participation in the Quality Payment Program for the 2020 performance period. We continue to monitor the developing COVID-19 event and will update our guidance accordingly.

What should I do if I am eligible for the automatic extreme and uncontrollable circumstances policy, but my performance feedback does not reflect the correct reweighting?

If you believe that you qualified for the automatic extreme and uncontrollable circumstances policy but you do not see it reflected in your performance feedback for the 2019 performance period, you should submit a [targeted review](#) request during the 60 days following the release of the 2021 payment adjustment so that CMS can review your eligibility for this policy. 2019 final performance feedback is expected to be available summer 2020.

What happens if I am a MIPS eligible clinician covered by the automatic extreme and uncontrollable policy but still submit 2019 data?

That depends on how many performance categories you submit data for.

- If you submit data for 1 performance category (or no data at all), you will receive a final score equal to the performance threshold and receive a neutral payment adjustment.
- If you submit data for 2 or 3 performance categories (Quality, Improvement Activities, and/or Promoting Interoperability), you will be scored on the performance categories for which you submitted data. Your payment adjustment will be determined by your final score.
- You will **not** be scored on the Cost performance category under the automatic extreme and uncontrollable circumstances policy.

What happens if I've submitted Medicare Part B claims during the performance year?

If you're in a small practice and report quality measures through Medicare Part B claims, your Medicare Part B claims measures will only contribute to your final score if you also submit data for the Promoting Interoperability and/or the Improvement Activities performance categories. If you don't submit data for the Promoting Interoperability and/or Improvement Activities performance categories, you would not be scored on at least 2 categories and would receive a score equal to the performance threshold, resulting in a neutral payment adjustment.

Where Can I Learn More?

- [Quality Payment Program Website](#)
- [2019 PFS Final Rule](#)
- [CMS's Current Emergencies Webpage](#)

You can subscribe to the [QPP listserv](#) and you can also contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8:00 a.m. - 8:00 p.m. Eastern Time or by email at: QPP@cms.hhs.gov. Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.

Appendix A

The table below illustrates the 2019 performance category reweighting policies that CMS will apply for clinicians who qualify for the MIPS automatic extreme and uncontrollable circumstances policy but submit MIPS data as individuals or are part of a group that submits data on their behalf.²

MIPS eligible clinicians who are automatically identified will have all 4 performance categories weighted at 0% and will receive a MIPS final score equal to the performance threshold, resulting in a neutral payment adjustment for the 2021 MIPS payment year. However, if automatically identified MIPS eligible clinicians submit data on 2 or more MIPS performance categories (Quality, Improvement Activities, and/or Promoting Interoperability) as an individual or they are part of a group or virtual group that submits data on behalf of its clinicians, they will be scored on those performance categories and receive a 2021 MIPS payment adjustment based on their 2019 MIPS final score.

Data Submitted	Quality Category Weight	Promoting Interoperability Category Weight	Improvement Activities Category Weight	Cost Category Weight	Payment Adjustment
No data	0%	0%	0%	0%	Neutral
Submit Data for One Performance Category					
Quality Only	100%	0%	0%	0%	Neutral
Promoting Interoperability Only	0%	100%	0%	0%	Neutral
Improvement Activities Only	0%	0%	100%	0%	Neutral
Submit Data for 2 Performance Categories					
Quality and Promoting Interoperability	75%	25%	0%	0%	Positive, Negative, or Neutral
Quality and Improvement Activities	85%	0%	15%	0%	Positive, Negative, or Neutral
Improvement Activities and Promoting Interoperability	0%	50%	50%	0%	Positive, Negative, or Neutral
Submit Data for 3 Performance Categories					
Quality and Improvement Activities and Promoting Interoperability	60%	25%	15%	0%	Positive, Negative, or Neutral

² See 42 C.F.R. §414.1380