

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

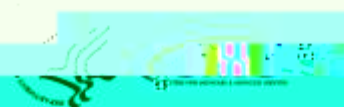
What Is the MIPS automatic extreme and uncontrollable circumstances policy?

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





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

The Cost performance category will always be weighted at 0%, even if you submit data for the other performance categories.



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 Two Performance Categories					
Quality and Promoting Interoperability	50%	50%	0%	0%	Neutral
Quality and Improvement Activities	50%	0%	50%	0%	Neutral
Promoting Interoperability and Improvement Activities	0%	50%	50%	0%	Neutral
Submit Data for Three Performance Categories					
Quality, Promoting Interoperability, and Improvement Activities	33%	33%	33%	0%	Neutral
Submit Data for All Performance Categories					
Quality, Promoting Interoperability, Improvement Activities, and Cost	25%	25%	25%	25%	Neutral

