

COVID-19 RISK ALERT

June 29, 2020



How has COVID-19 Impacted MIPS?

There is no doubt that COVID-19 has impacted every aspect of life, including many providers' ability to fully participate in the Merit-based Incentive Payment System (MIPS). While the Centers for Medicare & Medicaid Services (CMS) has not removed the participation requirements for MIPS, on June 24, 2020, CMS announced that qualifying clinicians or groups significantly impacted by COVID-19 may submit an Extreme and Uncontrollable Circumstances Application to reweight one or all of the MIPS performance categories due to the COVID-19 public health emergency.

Extreme and Uncontrollable Circumstances Exception Application

The [Extreme and Uncontrollable Circumstances Exception Policy](#) is not new to MIPS and for the 2020 performance year, CMS will be using this policy to allow clinicians, groups and virtual groups to submit an application requesting reweighting of one or more MIPS performance categories due to the current COVID-19 public health emergency (PHE).

One change is that unlike prior years, where applying for the Extreme and Uncontrollable Circumstance was done through the Quality Payment Program (QPP) portal (www.qpp.cms.gov), for the 2020 performance year, a HCQIS Access Roles and Profile (HARP) account is needed to complete and submit an exception application. For more information on HARP accounts, please refer to the [Register for a HARP Account](#) document in the [QPP Access User Guide](#).

The 2020 Extreme and Uncontrollable Circumstances Application is open through December 31, 2020 at 8 pm EST.

Applications are reviewed on a case-by-case basis, and if approved, the performance categories included in the application are weighted at 0% and will not contribute to the final score. While you are not required to submit documentation with your application, CMS encourages qualifying clinicians, groups and virtual groups to retain documentation of their circumstances supporting their application for their own records in the event they are selected by CMS for data validation or audit.

Clinicians can still submit data for the MIPS performance categories selected for reweighting in the application.

Data submission overrides the performance category reweighting approved through an application on a category-by-category basis.

- For example: a MIPS eligible clinician, can submit an application to have all four performance categories reweighted, but later determine they are able to collect and submit data for the Improvement Activities and Promoting Interoperability performance categories. S/He will receive a MIPS final score based on the data submitted; the Improvement Activities performance category will be weighted to 15% and Promoting Interoperability performance category will be weighted to 85% of the final score. The Quality performance category will retain a 0% weight because no Quality data was submitted, and the Cost performance category will retain a 0% weight because there are no data submission requirements associated with the Cost performance category.

A qualifying clinician, group or virtual group must be scored on at least two performance categories to earn a MIPS final score greater than the performance threshold. If data is submitted for fewer than two performance categories, clinician, group or virtual group will receive a neutral payment adjustment in 2022.

When evaluating applications, CMS will consider the length of time qualifying clinicians, groups and virtual groups were impacted. For example, the performance period for an improvement activity is a continuous 90-day period (or as specified in the activity description) whereas the performance period for the Quality performance category is 12 months, so an issue lasting 3 months may have more impact on the availability of measures for the Quality performance category than your ability to perform and attest to improvement activities.

For More Information

- Visit the [QPP COVID-19 Response webpage](#) or review the [COVID-19 Fact Sheet](#) to learn more about changes to the Quality Payment Program in response to the COVID-19 pandemic.
- Review the [2020 Exception Applications Fact Sheet](#) and [QPP Exception Applications webpage](#) for more information about submitting an Extreme & Uncontrollable Circumstances Application.

Questions?

As always, Conventus members can call our Practice Resource Department at (877)-444-0484 ext.7466 to speak with a member of our team for assistance with understanding their 2020 MIPS requirements as well as assistance in submitting an Extreme and Uncontrollable Circumstances Application.