



Updated April 3, 2020

CMS Regulatory Relief Under MIPS Due to COVID-19

By Jarrod Fowler, MHA
FMA Director of Health Care Policy & Innovation

The guidance provided below pertains to the 2019 CY MIPS program.

In addition to the guidance concerning the 2019 CY MIPS program provided below, CMS has stated that it is evaluating its options for providing relief around the participation and data submissions requirements for the 2020 CY MIPS program. We will continue to provide updates as new information becomes available.

2019 MIPS Submission Deadline Extended: Submit 2019 Data by April 30, 2020

The 2019 Merit-based Incentive Payment System (MIPS) data submission deadline will be extended by 30 days to April 30, 2020. If you have already submitted MIPS data or if you submit MIPS data by April 30, 2020, you will be scored and receive a MIPS payment adjustment based on the data you submit. Many MIPS eligible clinicians have performed very well in the

MIPS program in previous years. If you need to revise any data that has already been submitted you can still make changes by logging into qpp.cms.gov by the new deadline.

2019 MIPS Automatic Extreme and Uncontrollable Circumstances Policy Update

MIPS eligible clinicians who have not submitted any MIPS data by April 30, 2020 do not need to take any additional action to qualify for the automatic extreme and uncontrollable circumstances policy. These clinicians will be automatically identified and receive a neutral payment adjustment for the 2021 MIPS payment year. All four MIPS performance categories for these clinicians will be weighted at zero percent, resulting in a score equal to the performance threshold, and a neutral MIPS payment adjustment for the 2021 MIPS payment year. However, if a MIPS eligible clinician submits data on two or more MIPS performance categories, they will be scored and receive a 2021 MIPS payment adjustment based on their 2019 MIPS final score.

CMS will continue monitoring the developing COVID-19 sit-

uation and assess options to bring additional relief to clinicians and their staff so they can focus on caring for patients.

What if I already submitted data and want to take advantage of this flexibility?

CMS is re-opening the 2019 extreme and uncontrollable circumstances application to allow clinicians, groups and virtual groups to request reweighting of the MIPS performance categories to 0 percent. An extreme and uncontrollable circumstance application submitted between April 3 and April 30, 2020 citing COVID-19, and approved by CMS, will override any previous data submission. (Please disregard any statements within the application or system notifications about data submission voiding the reweighting approved by the application. That is our general policy for these applications but does not apply in this circumstance.)

The application is available for:

- Individual clinicians who started, but are unable to complete, their data submissions;
- Small practices that were automatically scored as a group on Medicare Part B claims quality measures;
- Groups that started, but are unable to complete, their data submissions; and
- Virtual groups that are unable to start or complete their data submissions.

Applications can be submitted by a third party with permission from the clinician or practice. The application is accessible [here](#). When completing the application:

- **Select individual, group or virtual group as appropriate to your level of participation;**
- **Select 1/1/2020 and 4/30/2020 as your start and end dates;**
- **Indicate that you are unable to complete data submission due to the COVID-19 pandemic; and**
- **Select all 4 performance categories for reweighting to receive a neutral payment adjustment.**

If you have questions about a previously approved application submitted before December 31, 2019, please contact the **Quality Payment Program** at 1-866-288-8292, Monday through Friday, 8 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. [Access the application here.](#)

For More Information

Please reference the 2019 QPP Data Submission User Guide. CMS also has up to date information about its programs and response to COVID-19 on the Current Emergencies page.

For Quality Payment Program questions you can contact 1-866-288-8292, Monday through Friday, 8:00 AM-8:00 PM ET or by e-mail at: QPP@cms.hhs.gov.

