



Quality Payment PROGRAM



CMS Reopens the MIPS Extreme and Uncontrollable Circumstances Application for the 2021 MIPS Performance Year in Response to COVID-19

CMS continues to offer flexibilities to provide relief to clinicians responding to the 2019 Coronavirus (COVID-19) public health emergency (PHE). We applied the Merit-based Incentive Payment System (MIPS) automatic extreme and uncontrollable circumstances (EUC) policy to all individual MIPS eligible clinicians for the 2021 performance period.

Now we've also **reopened** the [MIPS EUC application](#) for groups, virtual groups, and Alternative Payment Model (APM) Entities through March 31, 2022, at 8 p.m. ET. (Because of the automatic EUC policy, you don't need to submit an application for individual clinicians.) **Please note that applications received between now and March 31, 2022, won't override previously submitted data for groups and virtual groups.**

MIPS EUC applications citing COVID-19 as the triggering event can be submitted until Thursday, March 31, 2022, at 8 p.m. ET.

This listserv will review what the MIPS EUC application extension means for:

- Groups and virtual groups that haven't submitted data.
- Groups and virtual groups that have submitted data.
- APM Entities.

Groups and virtual groups that haven't submitted data:

- **Groups:** You don't need to take any further action if you're unable to submit data for the 2021 performance period. Group participation is optional, and your individual MIPS eligible clinicians qualify for the MIPS automatic EUC policy. They'll have all 4 performance categories reweighted to 0% and receive a neutral payment adjustment for the 2023 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 2021 performance period, **you must submit a MIPS EUC application for all 4 performance categories by the March 31, 2022, deadline.**

Groups and virtual groups that have submitted data.

- **Groups and virtual groups that have submitted data for a single performance category:**
 - If you're unable to complete data submission for other performance categories, you can [submit a MIPS EUC application](#) to request reweighting in the remaining 3 performance categories.
 - **This includes small practices that were automatically scored as a group on Medicare Part B claims measures submitted throughout the 2021 performance period.**
 - If you don't [submit a MIPS EUC application](#), your group will be scored in all performance categories unless you're eligible for reweighting in one or more performance categories.
 - If your application is approved and no additional data is submitted at the group level (or available for scoring, such as the automatic improvement activities credit awarded to groups with clinicians participating in an APM), your MIPS eligible clinicians will receive a neutral payment adjustment for the 2023 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 2023 MIPS payment year.
 - **You can't submit an application to override previously submitted data** but you can submit an application to request reweighting of performance categories for which you haven't submitted data.

APM Entities (includes Shared Savings Program Accountable Care Organizations (ACOs))

Official representatives of APM Entities participating in MIPS, including Shared Savings Program ACOs, can submit a [MIPS EUC application](#) on behalf of all MIPS eligible clinicians in the APM Entity for the 2021 performance year. If approved, all of the MIPS eligible clinicians in the APM Entity will receive a neutral MIPS payment adjustment in the 2023 MIPS payment year. (Applications must be submitted by an official representative of the APM Entity, and not by a participant in the APM.)

There are some differences from our existing 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 MIPS EUC applications for individuals, groups and virtual groups, an APM Entity's approved application for performance category weighting **will** override previously submitted data.

Additional Resources

- [Quality Payment Program COVID-19 Response Fact Sheet \(PDF\)](#)
- [2021 MIPS Extreme and Uncontrollable Circumstances Exception Application Guide](#)

- [2021 Data Submission FAQs](#)

For more information, please see the [Quality Payment Program COVID-19 Response webpage](#) of the QPP website. You can contact the Quality Payment program at 1-866-288-8292, Monday through Friday, 8 a.m. - 8 p.m. ET or by e-mail at: QPP@cms.hhs.gov. To receive assistance more quickly, please consider calling during non-peak hours— before 10 a.m. and after 2 p.m. ET. Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.

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