

Quality Payment Program – COVID-19 Response

[Updated 6/11/2020](#)

The Centers for Medicare & Medicaid Services (CMS) is implementing multiple flexibilities for the Quality Payment Program (QPP) in response to the 2019 Novel Coronavirus (COVID-19) pandemic. Specifically, we've:

- [Extended the 2019 MIPS data submission deadline](#);
- Identified the COVID-19 pandemic as a triggering event for the [MIPS Automatic Extreme and Uncontrollable Circumstances \(E&UC\) policy](#) for the 2019 performance period. This policy only applies to individual MIPS eligible clinicians;
- Re-opened the 2019 [Extreme and Uncontrollable Circumstances \(E&UC\) application](#) to individuals, groups and virtual groups, including those who have already submitted data;
- Added a new high-weighted improvement activity (IA) to the [2020 Improvement Activities Inventory](#) that promotes participation in COVID-19 clinical trials and reporting COVID-19 related care data to a clinical data repository or clinical data registry for the duration of their study;
- Delayed the implementation of the [Qualified Clinical Data Registry \(QCDR\)](#) measure testing and data collection policies by 1 year;
- Extended the [2020 Call for Quality Measures](#); and
- Extended the deadline for submission of the [Data Validation Execution Reports \(DVER\)](#).

COVID-19 Response At-a-Glance

Relief Effort	How Does It Work?	Who Is it Available to?
Extended Submission Window	You (or a third party) could submit data on qpp.cms.gov until April 30, 2020 at 8pm ET.	Individuals, Groups and Virtual Groups
Automatic E&UC Policy	<p>Clinicians who don't submit data will automatically receive a neutral payment adjustment in 2021.</p> <p>MIPS performance categories are weighted at 0% for the 2019 performance year for individual clinicians.</p> <p>Data submission by individual clinicians voids the 0% performance category weight on a category-by-category basis.</p> <p>Appendix A outlines performance category weights and payment adjustment implications based on data submission by individual clinicians.</p>	<p>Individual MIPS eligible clinicians</p> <p><u>The automatic policy does not apply to groups or virtual groups.</u></p> <ul style="list-style-type: none"> • Groups will be scored in all performance categories once data has been submitted unless they submit an application to void previously submitted data. • Clinicians in a virtual group will receive a final score and payment adjustment regardless of data submission unless the virtual group submits an application.

[Updated 6/11/2020](#)



Relief Effort	How Does It Work?	Who Is it Available to?
<u>COVID-19 E&UC Application</u>	You (or a third party) could <u>complete an application</u> until April 30, 2020 at 8pm ET. Approved applications will reweight performance categories to 0% and <u>void any previously submitted data</u> .	Individuals, Groups and Virtual Groups There is no need to complete an application as an individual if you haven't submitted data or have submitted data for one performance category as an individual.
<u>COVID-19 Clinical Trials Improvement Activity</u>	To receive credit for the new <i>COVID-19 clinical trials</i> improvement activity in 2020, clinicians must attest that they have participated: 1) in a COVID clinical trial and the data has been entered into a data platform for that study; or 2) in the care of COVID patients and submitted clinical COVID patient data to a clinical data registry for purposes of future study.	Individual, Groups and Virtual Groups
<u>QCDR measure testing and data collection</u>	Delayed the implementation of the Qualified Clinical Data Registry (QCDR) measure testing and data collection approval criteria by 1 year.	Qualified Clinical Data Registries (QCDRs)
<u>Extended 2020 Call for Quality Measures</u>	You can submit quality measures for consideration in future performance years through June 30, 2020.	Measure stewards and stakeholders
<u>Extended Deadline for Submission of DVER</u>	CMS approved third party intermediaries can submit their data validation execution reports for the 2019 performance year through June 30, 2020.	Qualified Clinical Data Registries (QCDRs) and Qualified Registries

Extension to the 2019 Data Submission Deadline

We extended the 2019 Merit-based Incentive Payment System (MIPS) data submission deadline by 30 days from March 31 to **April 30, 2020**.

[Updated 6/11/2020](#)

MIPS Automatic Extreme and Uncontrollable Circumstance Policy

CMS determined that the MIPS automatic extreme and uncontrollable circumstances policy applies to all individual MIPS eligible clinicians for the 2019 performance period.

MIPS eligible clinicians reporting as individuals will only be scored on performance categories for which data was submitted. All other performance categories will be reweighted to 0% of their final score. (See [Appendix A](#))

- MIPS eligible clinicians who didn't submit 2019 MIPS data by the April 30, 2020 extended deadline will automatically receive a neutral payment adjustment.
- MIPS eligible clinicians reporting as individuals who submitted 2019 MIPS data for one performance category by the April 30, 2020 extended deadline will automatically receive a neutral payment adjustment.
- MIPS eligible clinicians reporting as individuals who have submitted 2019 MIPS data for two or three performance categories by the April 30, 2020 extended deadline will receive a final score based on the performance categories for which data was submitted and may earn a negative, neutral or positive payment adjustment. (See [Appendix A](#))

An approved COVID-19 [extreme and uncontrollable circumstances application](#) will void previously submitted data.

All individually eligible clinicians will see the following indicator on the [QPP Participation Status Tool](#)

HARDSHIP EXCEPTION

Yes

Extreme and uncontrollable circumstances

Medicare Shared Savings Program and Other MIPS Alternative Payment Models

For MIPS eligible clinicians participating in Medicare Shared Savings Program Accountable Care Organizations (ACOs) or in APM entities participating in other MIPS Alternative Payment Models (APMs), the APM quality score reflects any changes made under the terms of each MIPS APM's respective extreme and uncontrollable circumstances policy; the Cost performance category is always weighted at 0% of the MIPS final score for MIPS APM participants; and the Promoting Interoperability performance category is reweighted to 0% of the MIPS final score if no data is submitted. As a result, MIPS APM participants that do not submit quality data would only have a score in one performance category (improvement activities), and thus they would receive a neutral payment adjustment for the 2021 MIPS payment year.

[Updated 6/11/2020](#)

What if I Submitted Data as Individual for the 2019 Performance Year?

Any data you submitted as an individual will override reweighting of that performance category under the automatic extreme and uncontrollable circumstances policy.

MIPS eligible clinicians who submitted data as individuals by April 30, 2020 for two (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.

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

See [Appendix A](#) for more information about individual data submission and performance category weights.

What if Our Practice Submitted 2019 Performance Year Data as a Group?

The automatic extreme and uncontrollable circumstances policy does not apply to group participation. If you are a MIPS eligible clinician in a practice that submitted data as a group, 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 data submitted. Groups that were not able to complete their data submission for the 2019 performance year were able to submit an [extreme and uncontrollable circumstances application](#) to void previously submitted data.

If your group did not submit any data by April 30, 2020 and you did not submit any data as an individual you will receive a neutral payment adjustment for the 2021 MIPS payment year.

What if We're Participating in MIPS as a Virtual Group?

The automatic extreme and uncontrollable circumstances policy does not apply to virtual groups. Virtual groups who were unable to submit data by April 30, 2020 were able to submit an [extreme and uncontrollable circumstances application](#).

Extreme and Uncontrollable Circumstances Application

We re-opened the [2019 extreme and uncontrollable circumstances application](#) to allow clinicians, groups and virtual groups to request reweighting of the MIPS performance categories to 0%.

Extreme and uncontrollable circumstance applications citing COVID-19 could be submitted between April 3 and April 30, 2020, and if approved by CMS, the application voids any previously submitted data for the performance categories you selected in your application. These performance categories are weighted at 0% and will not contribute to your final score. Updates to scoring from approved applications should be currently reflected in your preliminary performance feedback available. (Final performance feedback will be available in July 2020.).

[Updated 6/11/2020](#)

New COVID-19 Clinical Trials Improvement Activity

We've added the new high-weighted *COVID 19 clinical trials* (IA_ERP_3) improvement activity for the 2020 performance period to provide an opportunity for clinicians to receive credit in MIPS for the important work they are doing across the country.

There are two ways MIPS eligible clinicians or groups can receive credit for this new improvement activity:

- A clinician may participate in a COVID clinical trial and have those data entered into a data platform for that study; or
- A clinician participating in the care of COVID-19 patients may submit clinical COVID-19 patient data to a clinical data registry for purposes of future study.

Clinicians could also pair the new *COVID-19 clinical trials* activity with the existing *Participation in a 60- day or greater effort to support domestic or international humanitarian needs* (IA_ERP_2) activity for full credit for the Improvement Activities performance category.

We intend for this improvement activity to be applicable to MIPS eligible clinicians that are reporting their COVID-19 related patient data to a clinical data repository, such as Oracle's [COVID-19 Therapeutic Learning System](#) and clinicians participating in clinical trials such as the [COVID-19 clinical trials](#) being conducted by the National Institutes of Health (NIH). Oracle has developed and donated a system to the U.S. government that allows clinicians and patients at no cost to record the effectiveness of promising COVID-19 drug therapies. (You can also refer to the [2020 MIPS Data Validation Criteria](#) for additional examples of clinical data repositories and clinical trials.)

The new improvement activity provides flexibility in the type of clinical trial, which could include designs ranging from the traditional double-blinded placebo-controlled trial to an adaptive design, or pragmatic design that flexes to workflow and clinical practice context. The goal is to support innovation and improve the collection of COVID-19 related data that clinicians have available to them and develop best practices that can drive improvements in patient care as clinicians monitor and manage the spread of COVID-19 in their practices. Encouraging clinicians to use an open source data collection tool will bring the results of their research to the forefront of healthcare much faster, leading to improvements in care delivery and most importantly the health of COVID-19 patients.

QCDR Approval Criteria: Measure Testing and Data Collection Delay

The Qualified Clinical Data Registry (QCDR) measure approval criteria necessitates QCDRs collecting data from clinicians in order to assess the measure before including it in the QCDR's self-nomination application. We anticipate that QCDRs may be unable to collect, and clinicians unable to submit, data on QCDR measures due to prioritizing the care of COVID-19 patients. Therefore, we are delaying implementation of the QCDR measure testing and data collection policies by 1 year, from the 2021 performance period to the 2022 performance period.

Extended Deadline: 2020 Call for Quality Measures

The [2020 Annual Call for Quality Measures](#) submission period has been extended through June 30, 2020. If complete test data is not available by June 30, 2020 or if new data is collected thereafter, measure stewards are asked to submit the data no later than Friday, September 4, 2020.

We are also implementing a new submission process to accommodate the unique circumstances of this Pre-Rulemaking cycle. For the 2020 submission period, stakeholders can submit candidate quality measure specifications and all supporting data files for CMS review by completing the Measures Under Consideration (MUC) template available on the [CMS Pre-Rulemaking website](#) and emailing it to prerulemaking@battelle.org.

For more information, please refer to the 2020 Call of Quality Measures Fact Sheet in the [2020 Call for Measures and Activities](#) zip file.

Extended Deadline: 2019 Data Validation Execution Report

The deadline for Qualified Clinical Data Registries (QCDRs) and Qualified Registries to submit their [DVER](#) has been extended to 5 pm ET on June 30, 2020. Late, incomplete, and/or absent DVER submissions may not be accepted and may lead to termination as a third-party intermediary in future program years. Rejected DVER submissions may lead to remedial action or termination as a third-party intermediary in future program years.

Frequently Asked Questions

What does the COVID-19 pandemic 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.

How will the neutral payment adjustment assigned to all MIPS eligible clinicians who do not submit data affect the 2021 payment adjustment for those who do submit data?

The MIPS automatic extreme and uncontrollable policy does not affect the Quality Payment Program's budget neutrality requirement. MIPS payment adjustments are required by law to be budget neutral. Generally stated, this means that the projected negative payment adjustments must be balanced by the projected positive payment adjustments. We understand that a lower than expected positive payment adjustment may be disappointing to those of you who were able to submit your data early, however it's critical that we support every clinician's ability to focus on caring for patients impacted by the COVID-19 pandemic.

Who did not need to submit an application for reweighting?

- MIPS eligible clinicians who did not submit any data or submitted individual data for only one performance category. These clinicians will automatically receive a neutral payment adjustment unless their practice is participating as a virtual group or submits data as a group.
- MIPS eligible clinicians who want to be scored on the data they have submitted as individuals in two or more performance categories. Under the automatic policy, clinicians will only be scored as individuals on the performance categories for which they submitted individual data.
- Groups that have submitted data and want to be scored in all applicable performance categories. Groups don't qualify for the automatic policy and will be scored on all applicable performance categories unless they submit an application.

When will 2019 MIPS performance feedback be updated to reflect performance category reweighting due to the automatic extreme and uncontrollable circumstances policy or an approved extreme and uncontrollable circumstances exception application?

Your preliminary 2019 MIPS performance feedback should now reflect performance category reweighting due to either the automatic extreme and uncontrollable circumstances policy or an approved extreme and uncontrollable circumstances exception application due to COVID-19.
(continued on next page)

- **Automatic policy:** Performance feedback will display a score of “N/A” for all performance categories for which an individual clinician did not submit data. Individual clinicians who didn’t submit any data will see a message that they qualify for the automatic extreme and uncontrollable circumstances policy.
- **Approved application:** Performance feedback will display a score of “N/A” for all performance categories that were included in the application.

Your performance feedback will still include any data that you submitted, even if the performance category was reweighted (This includes feedback on cost measures, provided that some data was submitted in another performance category.).

Your final score and payment adjustment information will be available in July 2020.

Where Can I Learn More?

- [Quality Payment Program](#)
- [2019 PFS Final Rule](#)
- [CMS’s Current Emergencies](#)
- [Medicare IFC: Revisions in Response to the COVID-19 Public Health Emergency \(CMS-1744-IFC\)](#)
- [Medicare and Medicaid IFC: Additional Policy and Regulatory Revisions in Response to the COVID-19 Public Health Emergency \(CMS-5531 IFC\)](#)

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.

Version History

Date	Change Description
6/11/2020	<ul style="list-style-type: none"> • Clarified language on p. 2 about the new COVID-19 clinical trials • Removed language on p. 5 about the new COVID-19 clinical trials improvement activity based on stakeholder feedback. (The language implied that participation in a QCDR was required for this activity, which is not the case.)
5/29/2020	<ul style="list-style-type: none"> • Added clarifying information about the new <i>COVID-19 clinical trials</i> (IA_ERP_3) improvement activity. • Added information about the extension for the submission of the DVER report. • Added information about the extension of the 2020 Annual Call for Quality Measures. • Added information about 2019 MIPS performance category reweighting in preliminary performance feedback due to the automatic extreme and

[Updated 6/11/2020](#)

Date	Change Description
	uncontrollable circumstances policy or an approved extreme and uncontrollable circumstances exception application. <ul style="list-style-type: none"> • Added Appendix B as an archive of FAQs related to the multiple flexibilities implemented for the Quality Payment Program.
4/29/2020	Added information about QCDR measure testing and data collection delay.
4/20/2020	Added information about the new <i>COVID-19 clinical trials</i> (IA_ERP_3) improvement activity.
4/14/2020	We made a number of revisions based on customer feedback to help clarify our policies, including: <ul style="list-style-type: none"> • Added a new “at-a-glance” section • Added information about the extreme and uncontrollable indicator on the QPP Participation Status lookup tool • Consolidated and reorganized information to remove duplicative questions • Removed targeted review question (will be addressed in a future resource).
4/3/2020	<ul style="list-style-type: none"> • Added information about extreme and uncontrollable circumstances application reopening as an option • Added information about implications for facility-based clinicians • Revised the question about Part B claims reporting to indicate that groups should submit an application • Revised language to clarify that the automatic extreme and uncontrollable policy does not apply to group participation
3/27/2020	Original posting

Appendix A: Automatic Policy

Performance Category Weights and Payment Adjustment based on Individual Data Submission

The table below illustrates the 2019 performance category reweighting policies that CMS will apply to clinicians under the MIPS automatic extreme and uncontrollable circumstances policy, including those that submit MIPS data as individuals.¹

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

¹ See 42 C.F.R. §414.1380

[Updated 6/11/2020](#)

Appendix B

We updated the main body of the fact sheet to reflect that the submission period and extreme and uncontrollable circumstances application are now closed. We created this appendix to maintain a record of the information provided about the application when it was open.

PY2019 Extreme and Uncontrollable Circumstances Application

We re-opened the [2019 extreme and uncontrollable circumstances application](#) to allow clinicians, groups and virtual groups to request reweighting of the MIPS performance categories to 0%.

The application is available for:

- [Individual clinicians](#) who started, but are unable to complete, their data submission;
- [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 submission; and
- [Virtual groups](#) that are unable to start or complete their data submission.

Applications can also 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, 8:00 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.


Applications for Individual Clinicians

Our practice is participating in MIPS as individuals. Under what circumstances would we need to complete an application for one of our clinicians?

The extreme and uncontrollable circumstances application is an option to reweight performance categories to 0% for any MIPS eligible clinician who:

- Has partial data submitted for two (2) or more performance categories; AND
- Will not be able to complete their data submission by April 30, 2020; AND
- Currently has a preliminary score below 30 points.

[Updated 6/11/2020](#)



Individual MIPS eligible clinicians who meet these criteria and don't complete an extreme and uncontrollable circumstances application could be subject to a negative payment adjustment in the 2021 payment year.

Reminder: Individual MIPS eligible clinicians who have not submitted 2019 performance year data or have only submitted data for one performance category will earn a final score equal to the performance threshold and a neutral payment adjustment.

Some of the clinicians in our practice are facility-based and eligible for facility-based measurement in 2019. Do we need to complete an application on their behalf to reweight their performance categories to 0%?

You will not need to complete an application for facility-based MIPS eligible clinicians who have not submitted any data to MIPS or who have submitted data for one performance category. We will not apply facility-based measurement to these clinicians.

We will apply facility-based measurement to facility-based MIPS eligible clinicians who have submitted data to MIPS for two or more performance categories. (Cost will not be scored.) You would need to complete an extreme and uncontrollable circumstances application for their clinicians to reweight all four performance categories to 0%.

Applications for Groups

Our practice was planning to participate in MIPS as a group, but we haven't submitted any data yet. Do we need to complete an extreme and uncontrollable circumstances application for our group?

No. There is no requirement to participate and submit data as a group. Your individually eligible clinicians are covered by the MIPS automatic extreme and uncontrollable circumstances policy. They will receive a neutral payment adjustment unless they've submitted individual data on two (2) or more performance categories.

Our small practice was automatically scored as a group for the Quality performance category because our clinicians reported Medicare Part B claims measures. Can we complete an extreme and uncontrollable circumstances application for our group?

Yes. Small practices were automatically scored as a group in the Quality performance category when their clinicians reported Part B claims measures. If your small practice has a Quality score and is not able, or did not intend, to submit group data for additional performance categories, you should submit an extreme and uncontrollable circumstances application on behalf of the group to reweight all four performance categories to 0%.

Our practice has already submitted some 2019 performance year data as a group. Do we need to complete an extreme and uncontrollable circumstances application?

The extreme and uncontrollable circumstances application is an option to reweight performance categories for any group that:

- Will not be able to complete their data submission by April 30, 2020; AND
- Currently has a preliminary score below 30 points.

MIPS eligible clinicians in a group that meets these criteria and doesn't complete an extreme and uncontrollable circumstances application will be scored in all performance categories and could be subject to a negative payment adjustment.

If you complete an extreme and uncontrollable circumstance application on behalf of the group, this will not override data submitted by the individual MIPS eligible clinicians in the practice.

Our practice is facility-based at the group level and eligible for facility-based measurement in 2019. Do we need to complete an extreme and uncontrollable circumstances application on behalf of the group to reweight all four performance categories to 0%?

To receive facility-based scoring in the MIPS Quality and Cost performance categories, the group must submit Improvement Activities and/or Promoting Interoperability data.

If your practice hasn't submitted any group-level data in either the Improvement Activities and/or the Promoting Interoperability performance categories, you do not need to complete an application. There is no requirement to participate and submit data as a group. Your individually eligible clinicians will receive a neutral payment adjustment unless they've submitted individual data on two (2) or more performance categories.

If your practice has submitted any group-level data in either of the Improvement Activities and/or the Promoting Interoperability performance categories, you would need to complete an application to reweight all four performance categories to 0%.

Applications for Virtual Groups

We are participating in MIPS as a virtual group and will not be able to start/complete our data submission by April 30th. Do we need to submit an extreme and uncontrollable circumstances application?

Yes. The MIPS eligible clinicians in a virtual group will receive a final score and payment adjustment based on the data submitted – or not submitted – by the virtual group. If you are not able to submit data because of the COVID-19 pandemic, you must submit an application to reweight all four performance categories on behalf of the virtual group.

Frequently Asked Questions

Should we delete previously submitted 2019 performance year data if we won't be able to complete reporting, to get the neutral payment adjustment?

No, but you can submit an extreme and uncontrollable circumstances application for COVID-19 relief until April 30th if you are unable to complete your data submission. If your application is approved, it will override previously submitted data.

There's a statement in the certification statement of the application that indicates data submission voids reweighting. I thought the application would void the data I've submitted. Which is right?

COVID-19 applications submitted between April 3 and April 30, 2020 will void previously submitted data. We wanted to make the application available as soon as possible, so we were not able to update verbiage within the application to align with our policy for this circumstance.

We were approved for performance category reweighting due to extreme and uncontrollable circumstances that occurred during 2019. Can we update our application to cover all MIPS performance categories?

If you were previously approved to have one or two MIPS performance categories reweighted and are now unable to submit data for any MIPS performance category due to the COVID-19 pandemic, please contact the Quality Payment Program. One of our representatives will be able to assist you with updating your existing application. Please note that our systems will not let you submit another application for the same TIN (group), TIN/NPI (individual), or virtual group ID.