

2020 MIPS Extreme and Uncontrollable Circumstances Exception Application Fact Sheet

[Updated 12/17/2020](#)

We understand that there may be circumstances out of your control that make it difficult for you to meet program requirements. To reduce this burden, we provide an opportunity for qualifying clinicians, groups, virtual groups and (as proposed) Alternative Payment Model (APM) Entities to apply for performance category reweighting for the Merit-based Incentive Payment System (MIPS).

In certain circumstances, MIPS performance category reweighting may be applied automatically.

- **Extreme and Uncontrollable Circumstances Exception Application**

This application allows you to request reweighting for any or all MIPS performance categories if you encounter an extreme and uncontrollable circumstance or public health emergency, such as COVID-19, that is outside of your control.

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New for the 2020 performance year: You must have a HCQIS Access Roles and Profile (HARP) account to complete and submit an exception application on behalf of yourself, or another MIPS eligible clinician, group or virtual group. For more information on HARP accounts, please refer to the **Register for a HARP Account** document in the [QPP Access User Guide](#).

Note: We have extended the deadline to submit a COVID-19 related extreme & uncontrollable circumstances application to February 1, 2021.



MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

What	<p>MIPS Extreme and Uncontrollable Circumstances Exception Application allow you to request one or more performance categories be reweighted to 0%.</p> <ul style="list-style-type: none"> • See Appendix A for more information about how performance category weights are redistributed.
Who	<p>Individual Clinicians, Groups, Virtual Groups and APM Entities</p> <ul style="list-style-type: none"> • Third Party Intermediaries can submit an application with permission from the clinician or practice.
Why	<p>You can submit an application to have your MIPS quality, cost, improvement activities, and/or Promoting Interoperability performance categories reweighted to 0% if:</p> <ul style="list-style-type: none"> • You experience an extreme and uncontrollable circumstance outside of your control, such as a natural disaster or public health emergency (PHE) (e.g. COVID-19 pandemic), that prevents you from collecting data for an extended period of time, or that could impact your performance on cost measures. <p>Note: APM Entities are required to request reweighting for all performance categories. (They aren't able to select some, but not all, performance categories.)</p>
When	<p>Extended! Now through February 1, 2021, 8 p.m. ET for COVID-19 related applications. Extreme and uncontrollable circumstance applications not related to COVID-19 must be submitted by December 31, 2020, 8 p.m. ET to be considered for approval.</p>
Where	<p>New for 2020: Sign in to qpp.cms.gov with your HCQIS Access and Roles Profile (HARP) account.</p> <ul style="list-style-type: none"> • For more information about how to create a HARP account, refer to the Register for a HARP Account document in the QPP Access User Guide.
How	<ol style="list-style-type: none"> 1. Register for a HARP account 2. Sign in to qpp.cms.gov 3. Select 'Exceptions Applications' on the left-hand navigation 4. Select 'Add New Exception' 5. Select 'Extreme and Uncontrollable Circumstances Exception' 6. Complete the application for individual, group, virtual group, or APM Entity participation

Extreme and Uncontrollable Circumstances Exception Information for Individuals, Groups, and Virtual Groups

You can submit an application to have your MIPS quality, cost, improvement activities, and/or Promoting Interoperability performance categories reweighted to 0% due to the 2019 Novel Coronavirus (COVID-19).

- If the COVID-19 pandemic prevents you, your practice or your virtual group from collecting 2020 MIPS performance period data for an extended period of time, or could impact your performance on cost measures, you can submit an extreme and uncontrollable circumstances application through February 1 for one or more performance categories.
- You will need to cite COVID-19 as the extreme and uncontrollable circumstance affecting you, your practice or your virtual group
- **IMPORTANT:** Even though we are extending the deadline for COVID-19 related extreme and uncontrollable circumstances applications into the PY 2020 submission period, individuals, groups and virtual groups can't submit an application to override PY 2020 data that has been submitted. Any data submitted for an individual, group or virtual group (before or after an application has been approved) will be scored.

We consider the variables affecting your ability to collect and submit data for each performance category when reviewing your application for performance category reweighting due to extreme and uncontrollable circumstances.

- We will review both the event circumstances and length of time you were impacted as indicated in your application to assess the ability of a MIPS eligible clinician to submit data for each performance category selected in the application.
 - 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.

You may qualify for our automatic extreme and uncontrollable circumstances policy.

- If you are an individual MIPS eligible clinician located in a CMS-designated area affected by an extreme and uncontrollable event during the 2020 MIPS performance year, you don't need to submit an application.
- These clinicians qualify for automatic reweighting of all MIPS performance categories and will receive a neutral payment adjustment.
- The automatic extreme and uncontrollable circumstances policy does not apply to groups or virtual groups.

Note: The COVID-19 pandemic PHE is not considered a qualifying event triggering the automatic extreme and uncontrollable policy for the 2020 performance period. However, you can submit an extreme and uncontrollable circumstances exception application, citing COVID-19 in your request, to request reweighting of one or more performance categories.



Sign up for [QPP Updates](#) or see the [2020 MIPS Automatic Extreme and Uncontrollable Circumstances Policy Fact Sheet](#) for announcements about events that would trigger the automatic extreme and uncontrollable circumstances policy.

You are not required to submit documentation with your application.

- However, you should retain documentation of the circumstances supporting your application for your own records in the event you are selected by CMS for data validation or audit.

You can still submit data for the MIPS performance categories approved for reweighting in the application.

- Data submission by individuals, groups and virtual groups override the performance category reweighting approved through your application on a category-by-category basis.
- Groups and virtual groups will not be scored on the All-Cause Hospital Readmission measure if the extreme and uncontrollable circumstances request is approved for the quality performance category unless quality data is submitted.
- If you are approved for reweighting of the cost performance category to 0%, you will never be scored on cost measures because there are no data submission requirements associated with the cost performance category.

For example: You, a MIPS eligible clinician (or group or virtual group), submit an application to have all four performance categories reweighted, but later determine you are able to collect and submit data for the improvement activities and Promoting Interoperability performance categories:

- You 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 your final score.
 - The quality performance category will retain a 0% weight because you didn't submit quality data.
 - The cost performance category will retain a 0% weight because there are no data submission requirements associated with the cost performance category (reweighting can't be voided).
- **IMPORTANT:** Even though we are extending the deadline for COVID-19 related applications into the PY 2020 submission period, individuals, groups and virtual groups can't submit an application to override PY 2020 data they've already submitted.



You must be scored on at least two performance categories to earn a MIPS final score other than the performance threshold.

- When fewer than 2 performance categories can be scored (meaning 1 performance category is weighted at 100% of your final score, and the other performance categories are weighted at 0%), the final score for the 2020 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2022.

You can identify additional people to access or receive notifications about the status of the application you're submitting.

In the Additional Access section of the application, you can provide the email address(es) of additional staff or representatives who should receive notifications about the status of the application.

- When you enter an email address that's associated with a HARP account, that person will also be able to access the application when they sign in to gpp.cms.gov with their HARP credentials.
- If you are submitting an application on behalf of an individual, group or virtual group, users with access to the practice or virtual group on gpp.cms.gov will only be able to access the application if you add the email associated with their HARP account.

Extreme and Uncontrollable Circumstances Exception Information for APM Entities

We have finalized a policy to allow MIPS APM Entities to submit a PY 2020 extreme and uncontrollable circumstances exception application for all MIPS performance categories.

- This policy was finalized in the [CY 2021 Quality Payment Program Final Rule](#).
- APM Entities (those with MIPS eligible clinicians who aren't Qualifying APM Participants, or QPs) in the following models can submit an application:
 - Medicare Shared Saving Program
 - Next Generation ACO Model
 - Vermont Medicare ACO Model
 - Comprehensive Primary Care Plus (CPC+)
 - Comprehensive ESRD Care (CEC)
 - Bundled Payments for Care Improvement (BPCI) Advanced Model
 - Oncology Care Model (OCM)
 - Maryland Primary Care Program
 - Independence at Home Demonstration

When you submit an application on behalf of an APM Entity, you are attesting that at least 75% of the MIPS eligible clinicians in the Entity qualify for reweighting in the Promoting Interoperability performance category.

- They may qualify [automatically](#) or by meeting one of the criteria for a [MIPS Promoting Interoperability hardship exception](#).

You are not required to submit documentation with your application.

- However, you should retain documentation of the circumstances supporting your application for your own records in the event you are selected by CMS for data validation or audit.

APM Entity applications must be submitted for all performance categories

- You can't submit an application for an APM Entity to request reweighting in one or two performance categories
- This is different from our policy for individual, group and virtual group applications

If your APM Entity's application is approved, the APM Entity will receive a final score equal to the performance threshold and the MIPS eligible clinicians in the APM Entity group will receive a neutral payment adjustment even if data are submitted for the APM Entity.

- Data submitted for an APM Entity will not override performance category reweighting from an approved application.
- This is different from our policy for individual, group and virtual group applications.

An approved application won't affect your model-specific reporting requirements

- For example, Shared Savings Program ACOs must still report their quality measures through the CMS Web Interface to meet their requirements under the Shared Savings Program, unless otherwise excepted under that APM.

You can identify additional people to access or receive notifications about the status of the application you're submitting.

In the Additional Access section of the application, you can provide the email address(es) of additional staff or representatives who should receive notifications about the status of the application.

- When you enter an email address that's associated with a HARP account, that person will also be able to access the application when they sign in to qpp.cms.gov with their HARP credentials.
- If you are submitting an application on behalf of a APM Entity, users with access to the APM Entity on qpp.cms.gov will only be able to access the application if you add the email associated with their HARP account.

Where You Can Go for Help

- Contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8:00 AM-8:00 PM ET or by e-mail at: QPP@cms.hhs.gov.
 - Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.
- Connect with your [local technical assistance organization](#). We provide no-cost technical assistance to **small, underserved, and rural practices** to help you successfully participate in the Quality Payment Program.
- Visit the Quality Payment Program [website](#) for other [help and support](#) information, to learn more about [MIPS](#), and to check out the resources available in the [Quality Payment Program Resource Library](#).

Additional Resources

The [QPP Resource Library](#) houses fact sheets, measure specifications, specialty guides, technical guides, user guides, helpful videos, and more. We will update this table as more resources become available.

Resource	Description
Quality Payment Program Access User Guide	The 'Register for a HCQIS Access Roles and Profile (HARP) Account' in this zip file will guide you through the process of obtaining a User ID and password to sign in to the QPP and complete an exception application.
About QPP Exceptions Webpage	QPP 2020 Exceptions web content.
2020 MIPS Automatic Extreme and Uncontrollable Circumstances Policy Fact Sheet	This document addresses the automatic extreme and uncontrollable circumstances policy as it applies to MIPS eligible clinicians affected by natural disasters in 2020.
2020 MIPS Extreme and Uncontrollable Circumstances Exception Resources Zip File	This zip file includes a fact sheet and guide to help clinicians understand who is eligible for the Extreme and Uncontrollable Circumstances Exception and how to apply.
How to Apply for the 2020 Extreme and Uncontrollable Circumstances Hardship Exception Video	This video explains how to apply for an Extreme and Uncontrollable Circumstances Exception through the Quality Payment Program portal to reweight one or more Merit-based Incentive Payment System (MIPS) performance categories to 0% if you encounter an extreme and uncontrollable circumstance or public health emergency, such as COVID-19, that is outside of your control.

Version History

Date	Change Description
12/17/2020	Updated to note that only COVID-19 related extreme and uncontrollable circumstances will be considered for approval after December 31, 2020 and to reinforce that approved applications won't override data submission.
12/2/2020	Includes content from the 2020 MIPS Exceptions Application Fact Sheet, including policies finalized in CY 2021 Quality Payment Program Final Rule and the Extreme and Uncontrollable Circumstances Exception Application deadline extension for the 2020 performance year.

Appendix A. MIPS Performance Category Weight Redistribution Policies Finalized for the 2020 Performance Year

The table below illustrates the 2020 performance category weights and reweighting policies that CMS will apply to clinicians under MIPS.

As a reminder, if fewer than 2 performance categories can be scored (meaning 1 performance category is weighted at 100%, or all performance categories are weighted at 0%), the clinician, group or virtual group will receive a final score equal to the performance threshold and the MIPS eligible clinicians will receive a neutral payment adjustment in the 2022 payment year.

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
No Reweighting Applies	45%	15%	15%	25%
Reweight 1 Performance Category				
No Cost (APM Scoring Standard)	50%	0%	20%	30%
No Cost	55%	0%	15%	30%
No Promoting Interoperability	70%	15%	15%	0%
No Quality	0%	15%	15%	70%
No Improvement Activities	60%	15%	0%	25%
Reweight 2 Performance Categories				
No Cost and No Promoting Interoperability	85%	0%	15%	0%
No Cost and No Promoting Interoperability (APM Scoring Standard)	75%	0%	25%	0%
No Cost and No Quality	0%	0%	15%	85%
No Cost and No Quality (APM Scoring Standard)	0%	0%	20%	80%
No Cost and No Improvement Activities	70%	0%	0%	30%
No Promoting Interoperability and No Quality	0%	50%	50%	0%
No Promoting Interoperability and No Improvement Activities	85%	15%	0%	0%
No Quality and No Improvement Activities	0%	15%	0%	85%