

Quality Payment Program (QPP): COVID-19 Flexibilities, Exemptions, and Delayed Reporting Timelines

Updated April 15, 2020

The Centers for Medicare and Medicaid (CMS) announced administrative relief and reporting flexibilities for providers participating in the Quality Payment Program.

2019 Performance Year Data Submission (2021 Payment Adjustments)

The MIPS Performance Year 2019 reporting deadline is extended through April 30, 2020.

- Clinicians reporting as individuals in the MIPS: For individual clinicians who do not report data by April 30, they will fall into the automatic MIPS Extreme and Uncontrollable Circumstances policy. Clinicians have their performance categories reweighted and will receive a neutral payment adjustment. This includes hospitalists who qualify for facility-based reporting but do not report on the Improvement Activities category.
- Group reporting in the MIPS: Groups are not eligible for the automatic Extreme and
 Uncontrollable Circumstances policy. Groups that submit data to CMS will continue to be scored
 normally, unless the group submits an Extreme and Uncontrollable Circumstances application.
 Groups that did not submit any MIPS data will not be considered a group, and the individual
 clinicians may be eligible for the automatic MIPS Extreme and Uncontrollable Circumstances
 policy.

CMS has reopened the MIPS Extreme and Uncontrollable Circumstances application and extended the deadline to April 30. Individual clinicians, groups and virtual groups that already began submitting data but will be unable to complete their data submissions should submit an application. Any application submitted between April 3, 2020 and April 30, 2020 will override any previous data submission.

2020 Performance Year (2022 Payment Adjustments)

CMS is currently weighing options around additional relief efforts for the data submission for 2020. SHM expects the 2021 Physician Fee Schedule and Quality Payment Program Rule to contain information about any changes to the 2020 MIPS Performance Year submission requirements.

Additional Resources from CMS:

- Quality Payment Program-COVID-19 Fact Sheet
- MIPS Extreme and Uncontrollable Circumstances Application
- QPP Participation Status Tool
- CMS Announces Relief for Clinicians, Providers, Hospitals and Facilities Participating in Quality Reporting Programs in Response to COVID-19