Quality Payment

Quality Payment Program – COVID-19 Response

Updated 6/15/2023

The Centers for Medicare & Medicaid Services (CMS) has implemented multiple flexibilities for the Quality Payment Program (QPP) in response to the 2019 Coronavirus (COVID-19) public health emergency (PHE), which ended on May 11, 2023.

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COVID-19 Response at a Glance

2023 Performance Year						
Relief Effort	How Does It Work?	Who Is it Available to?				
EUC Exception Application	Individuals, groups, and virtual groups (or a third party) can complete an EUC Exception application for one or more performance categories to be reweighted, citing that they have been impacted by COVID-19.	Individuals, Groups, Subgroups, Virtual Groups, and APM Entities				
	APM Entities can complete an EUC Exception application to request reweighting of <u>all</u> performance categories.					
	Subgroups who have registered for an MVP can contact the QPP Service Center to request reweighting.					
	The EUC Exception application is now available and will close at 8 p.m. ET on January 2, 2024.					
COVID-19 Clinical Data Reporting with or without Clinical Trial Improvement Activity	To receive credit for the COVID-19 Clinical Data Reporting with or without Clinical Trial improvement activity in 2023, clinicians must attest that they have participated: 1) in a COVID-19 clinical trial utilizing a drug or biological product to treat a patient with a COVID-19 infection and report their findings through a clinical data repository or clinical data registry for the duration of their study; or 2) in the care of a	Individuals, Groups, Virtual Groups, and APM Entities				



patient diagnosed with COVID-19 and simultaneously submit relevant clinical data to a	
clinical data registry for ongoing or future	
COVID-19 research.	

Where Can I Learn More?

- 2023 MIPS Extreme and Uncontrollable Circumstances Exception Application Guide (PDF)
- COVID-19 Response (QPP Website)

Subscribe to the QPP listserv by scrolling to the bottom of the webpage to receive notifications about program updates. You can also contact the Quality Payment Program Service Center by email at QPP@cms.hhs.gov, by creating a QPP Service Center ticket, or by phone at 1-866-288-8292 (Monday through Friday, 8 a.m. - 8 p.m. ET). To receive assistance more quickly, please consider calling during non-peak hours—before 10 a.m. and after 2 p.m. ET.

 People who are deaf or hard of hearing can dial 711 to be connected to a TRS Communications Assistant.

Version History

Date	Change Description
6/15/2023	Updated resource to reflect that for the 2023 performance year, CMS will continue to use the MIPS EUC Exception application to allow clinicians, groups, subgroups, and virtual groups to request reweighting of one or more MIPS performance categories due to COVID-19.
12/29/2022	 Updated resource based on the extension of the 2022 MIPS EUC application from January 3, 2023 – March 3, 2023. Updated resource to reflect the MIPS Automatic Extreme and Uncontrollable Circumstances (EUC) policy will not be applied to all individual clinicians. Removed information about COVID-19 policies for the 2021 performance year. Updated appendices to reflect reweighting / redistribution policies applicable to the 2022 performance year.
3/1/2022	 Updated resource based on the reopening of the 2021 MIPS EUC application from March 1, 2022 – March 31, 2022. Added clarification that data submission in the quality and/or Promoting Interoperability performance categories will initiate a score in the improvement activities performance category (which will override reweighting in this performance category from the automatic EUC policy or an approved EUC application.)
11/10/2021	Updated to reflect COVID policies for PY 2021, including the automatic EUC policy and doubling the Complex Patient Bonus. (Policies affecting previous)

Date	Change Description
	performance years are available on the COVID-19 Response page of the QPP website)
5/27/2021	Updated Appendix B to reflect a weight of 0% for the cost performance category.
2/25/2021	 Updated to reflect that we're applying the automatic extreme and uncontrollable policy to all MIPS eligible clinicians for PY 2020. Updated to reflect that we're extending the deadline for the extreme and uncontrollable exception application to March 31, 2021 to all MIPS eligible clinicians for 2020. Streamlined document to remove duplicative content for PY 2020. Removed policies for PY 2019 and future years; this information can be found in our COVID-19 Response web content. Updated Appendix A to reflect performance category weights under the automatic policy for PY 2020.
40/40/0000	Added Appendix B to outline or general reweighting policies in PY 2020.
12/18/2020	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 for individuals, groups and virtual groups won't override data submission.
12/2/2020	 Added PY 2020 application deadline extension. Added policies finalized in CY 2021 Quality Payment Program Final Rule for PY 2020: Open the Extreme and Uncontrollable Circumstances Exception Application for APM Entities. Double the Complex Patient Bonus. Waive CAHPS for ACOs Survey for Shared Savings Program ACOs. Noted that the Extreme and Uncontrollable Circumstances Exception Application will be available for PY 2021.
9/8/2020	Added 2020 policy finalized in the IFC-3. Clarified the new COVID-19 improvement activity by modifying the activity name and descriptions. Expanded Medicare patient assignment for the CMS Web Interface and CAHPS for MIPS survey. Added 2021 policy finalized in the IFC-3 about the new COVID-19 improvement activity.
8/17/2020	Added 2020 policy proposals from the CY2021 PFS NPRM: Open the Extreme and Uncontrollable Circumstances Exception Application for APM Entities. Double the Complex Patient Bonus. Added 2020 performance year FAQs.

Date	Change Description
6/24/2020	Added 2020 policy information about the Extreme and Uncontrollable
0/4/4/0000	circumstances application.
6/11/2020	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 isn't the case.)
5/29/2020	Added clarifying information about the new COVID-19 clinical trials (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
	uncontrollable circumstances policy or an approved extreme and uncontrollable circumstances exception application.
	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 COVID-19 clinical trials (IA_ERP_3) improvement activity.
4/14/2020	We made a number of revisions based on customer feedback to help clarify our policies, including:
	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	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: Performance Year 2023 Performance Category Weights

Table 1 identifies the performance category reweighting scenarios applicable to individuals, groups, virtual groups, and APM Entities <u>without</u> the small practice designation for the 2023 performance year.

Table 2 identifies the performance category reweighting scenarios applicable to individuals, groups, virtual groups, and APM Entities <u>with</u> the small practice designation for the 2023 performance year.

Table 1. Performance Category Reweighting Scenarios (Excluding Small Practices)

Reweighting Scenario	Quality Category Weight	Promoting Interoperability Category Weight	Improvement Activities Category Weight	Cost Category Weight	Payment Adjustment
No Reweighting					
All categories scored	30%	25%	15%	30%	Positive, Negative, or Neutral
Reweight 1 Performance Ca	itegory				
No Cost	55%	30%	15%	0%	Positive, Negative, or Neutral
No Promoting Interoperability	55%	0%	15%	30%	Positive, Negative, or Neutral
No Quality	0%	55%	15%	30%	Positive, Negative, or Neutral
No Improvement Activities	45%	25%	0%	30%	Positive, Negative, or Neutral
Reweight 2 Performance Ca	tegories				
No Cost and No Promoting Interoperability	85%	0%	15%	0%	Positive, Negative, or Neutral
No Cost and No Quality	0%	85%	15%	0%	Positive, Negative, or Neutral
No Cost and No Improvement Activities	70%	30%	0%	0%	Positive, Negative, or Neutral
No Quality and No Improvement Activities	0%	70%	0%	30%	Positive, Negative, or Neutral
No Promoting Interoperability and No Quality	0%	0%	50%	50%	Positive, Negative, or Neutral

Reweighting Scenario	Quality Category Weight	Promoting Interoperability Category Weight	Improvement Activities Category Weight	Cost Category Weight	Payment Adjustment
No Promoting Interoperability and No Improvement Activities	70%	0%	0%	30%	Positive, Negative, or Neutral
Reweight 3 Performance Ca	tegories				
No Quality, No Cost, No Improvement Activities	0%	100%	0%	0%	Neutral
No Quality, No Cost, No Promoting Interoperability	0%	0%	100%	0%	Neutral
No Cost, No Improvement Activities, No Promoting Interoperability	100%	0%	0%	0%	Neutral
Reweight 4 Performance Categories					
All performance categories reweighted to 0%	0%	0%	0%	0%	Neutral

Table 2. Performance Category Reweighting Scenarios (Small Practices Only)

Reweighting Scenario	Quality Category	Promoting Interoperability	Improvement Activities	Cost Category	Payment	
noweighting occinant	Weight	Category Weight	Category Weight	Weight	Adjustment	
No Reweighting						
All categories scored (Requires data submission for Promoting Interoperability)	30%	25%	15%	30%	Positive, Negative, or Neutral	
Reweight 1 Performance Ca	Reweight 1 Performance Category					
No Cost	55%	30%	15%	0%	Positive, Negative, or Neutral	
No Promoting Interoperability (Standard for Small Practices – Category	40%	0%	30%	30%	Positive, Negative, or Neutral	
automatically reweighted)						
No Quality	0%	55%	15%	30%	Positive, Negative, or Neutral	

Reweighting Scenario	Quality Category Weight	Promoting Interoperability Category Weight	Improvement Activities Category Weight	Cost Category Weight	Payment Adjustment
No Improvement Activities	45%	25%	0%	30%	Positive, Negative, or Neutral
Reweight 2 Performance Ca	tegories				
No Cost and No Promoting Interoperability	50%	0%	50%	0%	Positive, Negative, or Neutral
No Cost and No Quality	0%	85%	15%	0%	Positive, Negative, or Neutral
No Cost and No Improvement Activities	70%	30%	0%	0%	Positive, Negative, or Neutral
No Quality and No Improvement Activities	0%	70%	0%	30%	Positive, Negative, or Neutral
No Promoting Interoperability and No Quality	0%	0%	50%	50%	Positive, Negative, or Neutral
No Promoting Interoperability and No Improvement Activities	70%	0%	0%	30%	Positive, Negative, or Neutral
Reweight 3 Performance Ca	tegories				
No Quality, No Cost, No Improvement Activities	0%	100%	0%	0%	Neutral
No Quality, No Cost, No Promoting Interoperability	0%	0%	100%	0%	Neutral
No Cost, No Improvement Activities, No Promoting Interoperability	100%	0%	0%	0%	Neutral
Reweight 4 Performance Categories					
All performance categories reweighted to 0%	0%	0%	0%	0%	Neutral