Quality Payment
PROGRAM

2021 Merit-Based Incentive Payment System (MIPS) Assignment Methodology Specifications for the CMS Web Interface and CAHPS for MIPS Survey

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Acronyms

CAH	Critical Access Hospital
CAHPS	Consumer Assessment of Healthcare Providers and Systems
CCN	CMS Certification Number
CMS	Centers for Medicare & Medicaid Services
EHR	Electronic health record
ETA	Electing teaching amendment
FFS	Fee-for-service
FQHC	Federally Qualified Health Center
HCPCS	Healthcare Common Procedure Coding System
IDR	Integrated Data Repository
MPFS	Medicare Physician Fee Schedule
NPI	National Provider Identifier
MIPS	Merit-based Incentive Payment System
OPPS	Outpatient Prospective Payment System
PECOS	Provider Enrollment, Chain and Ownership System
POS	Place of service
QPP	Quality Payment Program
RHC	Rural health clinic
SNF	Skilled nursing facility
TIN	Taxpayer Identification Number

Executive Summary

This document outlines the Merit-based Incentive Payment System (MIPS) assignment methodology process for groups and virtual groups reporting data for the quality performance category via the Centers for Medicare & Medicaid Services (CMS) Web Interface and/or administering the Consumer Assessment of Healthcare Providers and Systems (CAHPS) for MIPS survey.

For purposes of MIPS, a group is defined as a single taxpayer identification number (TIN) with 2 or more eligible clinicians (including at least one MIPS eligible clinician), as identified by their individual National Provider Identifier (NPI), who have reassigned their billing rights to the TIN. Under MIPS, a virtual group is defined as a combination of 2 or more TINs assigned to one or more solo practitioners or to one or more groups consisting of 10 or fewer clinicians (including at least one MIPS eligible clinician), or both, that elect to form a virtual group for a performance period for a year.

For patient assignment, CMS uses retrospective patient assignment to:

- Identify patients eligible for sampling into the CMS Web Interface; and
- Identify patients eligible to receive the CAHPS for MIPS survey.

For the CAHPS for MIPS survey, patient assignment is determined retrospectively at the end of the registration period, which closes on June 30, 2021. For the CMS Web Interface, patient assignment for groups and virtual groups is determined retrospectively after the last Friday in October of 2021 (October 29, 2021).

Note that a patient assigned in one year may not necessarily be assigned in the following or preceding years. Furthermore, a patient assigned to a group or a virtual group for CAHPS for MIPS survey purposes may not be assigned to the same group or virtual group for CMS Web Interface purposes due to the differing assignment periods. Similarly, a patient assigned to a group or a virtual group for CAHPS for MIPS survey or CMS Web Interface purposes may not be assigned to the same group or virtual group for cost calculations. However, the MIPS assignment process is the same for both the CMS Web Interface and CAHPS for MIPS survey (except for the differing assignment periods).

If a patient receives at least one primary care service by a primary care clinician who is part of the group or virtual group, the patient is eligible to be assigned to the group or virtual group based on a 2-step process:

1. The first step assigns a patient to the group or virtual group if the patient receives the plurality of his or her primary care services from primary care clinicians who are part of the group or the virtual group. Primary care clinicians are defined as those with one of nine specialty designations: general practice, family practice, internal medicine, obstetrics/gynecology, pediatric medicine, geriatric medicine, nurse practitioner, clinical nurse specialist, and physician assistant.
2. The second step only considers patients who have not had any primary care service furnished by a primary care clinician, including primary care clinicians external to the group or the virtual group. Under the second step, CMS assigns a patient to the

group or the virtual group if the patient receives the plurality of his or her primary care services from clinicians who are not primary care clinicians within the group or virtual group.

A plurality means a greater proportion of primary care services was provided from clinicians who are part of the group or the virtual group than any other entity, measured in terms of allowed charges. A plurality may be less than the majority of services.

Section 1: Introduction

The information in this document outlines the MIPS assignment methodology for assigning patients to groups and virtual groups that elected and registered to submit data for the quality performance category via the CMS Web Interface and/or administer the CAHPS for MIPS survey.

For groups and virtual groups electing to submit data via the CMS Web Interface and/or administer the CAHPS for MIPS survey for the 2021 performance period, they are required to register through the Quality Payment Program website between April 1, 2021 and June 30, 2021. Groups and virtual groups that elect to use the CMS Web Interface for the 2021 performance period agree to submit 12 months of data for the quality performance category (January 1, 2021 to December 31, 2021) for all 10 CMS Web Interface measures:

- CARE-2 (Quality ID #318): Falls: Screening for Future Falls;
- DM-2 (Quality ID #001): Diabetes: Hemoglobin A1c (HbA1c) Poor Control (>9%);
- HTN-2 (Quality ID #236): Controlling High Blood Pressure;
- MH-1 (Quality ID #370): Depression Remission at Twelve Months;
- PREV-5 (Quality ID #112): Breast Cancer Screening;
- PREV-6 (Quality ID #113): Colorectal Cancer Screening;
- PREV-7 (Quality ID #110): Preventive Care and Screening: Influenza Immunization;
- PREV-10 (Quality ID #226): Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention;
- PREV-12 (Quality ID #134): Preventive Care and Screening: Screening for Depression and Follow-Up Plan; and
- PREV-13 (Quality ID #438): Statin Therapy for the Prevention and Treatment of Cardiovascular Disease.

Any applicable MIPS payment adjustment 2021 performance period will be applied in payment year 2023.

Section 2: Medicare Data Used to Assign Patients

This section describes the Medicare data used to assign patients to each group and virtual group participating in MIPS that elects to submit data for the quality performance category via the CMS Web Interface and/or administer the CAHPS for MIPS survey.

2.1 Data Used in Program

CMS primarily uses data from 2 Medicare data sources to assign patients for the program: (1) Medicare enrollment information and (2) claims data. The Medicare enrollment information is described in Section 2.1.1, and the claims data are described in Section 2.1.2.

2.1.1 Medicare Enrollment Information

For patients entitled to Medicare, we use Medicare enrollment information, including demographic information, enrollment dates, and Medicare managed care enrollment information.

2.1.2 Claims Data

CMS uses Medicare fee-for-service (FFS) claims data in assigning patients to a group or virtual group. There are 7 components of claims: (1) inpatient, (2) outpatient, (3) carrier (physician/supplier Part B), (4) skilled nursing facility (SNF), (5) home health agency, (6) durable medical equipment, and (7) hospice claims. On the basis of historical trends, CMS expects claims data generally to be 98–99% complete 3 months after the end of the calendar year. Waiting to perform assignment until 3 months after the end of the calendar year would unreasonably delay the start of the CMS Web Interface submission period; therefore, CMS uses partial-year data to assign patients for purposes of the quality performance category under MIPS. Patients will be assigned on the basis of the first 6 calendar months of available claims data for the CAHPS for MIPS survey, and the first 10 calendar months of available claims data for the CMS Web Interface.

For patient assignment for the CAHPS for MIPS survey, the effective date for claims will be set as January 1, 2021 through June 30, 2021. For patient assignment for purposes of the CMS Web Interface, the effective date for claims will be set as January 1, 2021 through the last Friday of October (October 29, 2021). For the CMS Web Interface and the CAHPS for MIPS survey, the claims will become available the Monday following the final date of the assignment period.

CMS obtains claims data using the Outpatient and Carrier claims files in the Integrated Data Repository (IDR), which will be referred to as Part A Outpatient claims and Part B Physician claims throughout this document. The IDR is updated each Monday to include claims data as of the previous Friday.

Section 3: Group and Virtual Group Patient Assignment for the CMS Web Interface and CAHPS for MIPS Survey

The first step in identifying patients for purposes of the CMS Web Interface and the CAHPS for MIPS survey is to determine which patients are assigned to the group or virtual group. For each

performance period, patient assignment is determined retrospectively. Thus, as previously noted, a patient assigned in one calendar year may not necessarily be assigned in the following or preceding calendar years. However, the assignment process is the same for the CMS Web Interface and the CAHPS for MIPS survey.

Section 3.1 describes each step of the methodology used for assigning patients.

3.1 Assignment Criteria

Using Medicare claims, CMS assigns patients to a group or virtual group in a 2-step process. A patient will be assigned to a participating group or virtual group for a given year if the following patient assignment criteria are satisfied within the assignment period.

A. Patient must have a record of enrollment.
    - Medicare must have information about the patient's Medicare enrollment status, as well as additional information needed to determine whether the patient meets other eligibility criteria.

B. Patient must have at least 1 month of both Part A and Part B enrollment, and cannot have any months of Part A only or Part B only enrollment.
    - Patients who only have coverage under one of these parts are not included.

C. Patient cannot have any months of Medicare group (private) health plan enrollment.
    - Only patients enrolled in traditional Medicare FFS under Parts A and B are eligible to be assigned. Those enrolled in a private or group health plan, including patients enrolled in Medicare Advantage plans under Part C, eligible organizations under section 1876 of the Social Security Act, and Program of All Inclusive Care for the Elderly programs under section 1894, are not eligible.

D. Patient must reside in the United States (U.S.) or U.S. territories and possessions.
    - CMS excludes patients whose permanent residence is outside the U.S. or U.S. territories or possessions. This excludes patients who may have received care outside of the U.S. and for whom claims are not available. For U.S. residence, it is defined as residence in the 50 States, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, or the Northern Marianas.

E. Patient must have the largest share of his/her primary care services provided by the participating group or within a virtual group.
    - If a patient meets the screening criteria in A through D, the patient is assigned to a group or virtual group in a 2-step process:
        - Assignment Step 1: CMS will assign the patient to the participating group or virtual group in this step if the patient has at least one primary

care service[1] furnished by a primary care clinician[2] in the participating group or virtual group, and if more primary care services (measured by Medicare allowed charges) are furnished by a primary care clinician who is part of the participating group or virtual group than by any other primary care clinician.

- Assignment Step 2: This step applies only for those patients who have not received any primary care services from any primary care clinician. CMS will assign the patient to the participating group or virtual group in this step if the patient has at least one primary care service furnished by a clinician[3] who is part of the participating group or virtual group, and more primary care services (measured by Medicare allowed charges) are furnished by the participating group or virtual group than any other entity.

  Entities used to determine patient assignment include group and individual practices (uniquely identified by a TIN) as well as Federally Qualified Health Centers (FQHCs), rural health clinics (RHCs), Method II critical access hospitals (CAHs), and electing teaching amendment (ETA) hospitals[4] (identified generally by their bill type code[5] and uniquely by their CMS Certification Number (CCN)[6]). Any of these types of entities could provide the plurality of primary care services to a patient, which would preclude assignment of that patient to a given group. These entities are included in Assignment Steps 1 and 2. Part B Physician claims will be used to identify services associated with a TIN, and Part A Outpatient claims will be used to identify services associated with an FQHC, RHC, CAH, or ETA hospital. In summary, CMS performs the assignment process simultaneously for all eligible entities using both Part B Physician and Part A Outpatient claims in each assignment step.

3.2 Programming Steps in Assigning Patients to Groups and Virtual Groups

There are 4 programming steps involved in assigning patients to a group or a virtual group, in accordance with the process described in Section 3.1.

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[1] Primary care services are defined in Table 1. Certain services that take place in a skilled nursing facility (i.e., on claims with a place of service (POS) 31 indicator) are excluded.

[2] Primary care clinician is defined in Table 2.

[3] Physician is defined in Table 3.

[4] ETA hospitals are hospitals that have voluntarily elected to receive payment on a reasonable cost basis for the direct medical and surgical services of their physicians in lieu of MPFS payments that might otherwise be made for these services (42 C.F.R. § 415.160(a)).

[5] Refer to Table 4 for a list of bill type codes used.

[6] ETA hospitals use the same bill type code as other outpatient hospital departments, so these entities are identified by a combination of bill type code and CCN.

- Programming Step 1: Create Finder File for Patients Who Received Primary Care Services with a Group or TINs Comprising a Virtual Group.
    - CMS will use the Part B Physician claims, and the TIN of the group or the TINs comprising a virtual group[7] to determine which patients received primary care services from those groups or virtual groups. This finder file will include a patient identifier for each patient who was furnished at least one primary care service by a clinician (primary care or otherwise) who is part of the group or the virtual group within the assignment period.
- Programming Step 2: Revise Finder File Based on Selected Claims, Enrollment, and Demographic Information for Patients.
    - CMS will obtain eligibility information for each patient identified in the finder file from Step 1. Eligibility information includes enrollment in Medicare Parts A and B, enrollment in a group health plan, primary payer code, and other enrollment information for these patients. CMS will revise the finder file by removing patients who do not meet the general eligibility requirements described in A through D of Section 3.1.
- Programming Step 3: Assign Patients to Participating Groups or Virtual Groups Using Assignment Step 1.
    - Using the patients identified in the revised finder file from Programming Step 2, CMS will identify patients who (1) received at least one primary care service (2) from a primary care clinician (3) who is part of the participating group or virtual group (4) during the most recent assignment period. CMS will assign patients who meet this condition to a group or a virtual group if the allowed charges for primary care services furnished to the patient by primary care clinicians who are part of the group or virtual group are greater than those furnished by primary care clinicians in other entities.

      For each patient identifier, CMS will sum allowed charges for primary care services. This includes allowed charges for primary care services for each patient at each entity where primary care services were received.[8] Primary care services are identified by looking for the applicable Healthcare Common Procedure Coding System (HCPCS) or revenue center code in the “Line Item HCPCS” field of the claim. For Part B Physician claims, CMS uses the allowed charges for primary care services as stated on the claim. Part A Outpatient claims do not have an equivalent “allowed charges” field and thus require special handling to determine allowed charges. Additional information on the special handling of Part A Outpatient claims is provided in section 3.4. Specific primary care HCPCS codes and revenue codes are

[7] Groups and virtual groups must have registered for the CMS Web Interface and/or the CAHPS for MIPS survey during the registration period. They will be identified with the registered group TIN or virtual group identifier for assignment purposes.

[8] The allowed charges must be greater than zero.

provided in Table 1.[9] To determine where a patient received the plurality of his or her primary care services, CMS compares the allowed charges for each patient for primary care services provided by clinicians who are part of the group or virtual group to those provided by other entities.

CMS uses allowed charges for assignment because, unlike expenditures, allowed charges include any Medicare deductible the patient may have been responsible for during the assignment period. By using allowed charges rather than a simple service count, it also reduces the likelihood that there will be ties.

It is unlikely that allowed charges by 2 different entities would be equal, but it is possible. In order to account for this scenario, the following has been established. If there are allowed charges that are equal for 2 different entities, then the patient will be assigned to the entity that provided the most recent primary care service by a primary care clinician. If there is still a tie, then the patient will be assigned to the entity that provided the most recent primary care service by a clinician. If there is still a tie, the patient is randomly assigned to one of the tied entities.

- Programming Step 4: Apply Assignment Step 2 to patients who were not assigned in Assignment Step 1.
    - This step applies only for those patients who have not received any primary care services from any primary care clinician. Thus, this step applies only for patients in the finder file from Programming Step 2 who remain unassigned to any group or virtual group, or other entity after Step 3. CMS will assign each of these patients to the group or virtual group if the allowed charges for primary care services furnished to the patient by clinicians who are part of the group or virtual group are greater than those furnished by clinicians in any other entity. If there is a tie, then the patient is assigned to the entity whose clinician provided the most recent primary care service. If there is still a tie, then the patient is randomly assigned to one of the tied entities.

3.3 Defining Primary Care Services

For individual MIPS eligible clinicians, groups, virtual groups, FQHCs, CAHs, and ETAs, primary care services are identified by the following HCPCS[10] codes for MIPS patient assignment purposes (Table 1).

[9] The specific codes that are considered primary care services may vary depending on the type of entity.

[10] Includes Current Procedural Terminology (CPT©) codes. Copyright 2011 American Medical Association. All rights reserved.

Table 1: Primary Care Service Codes[11]

Office or Other Outpatient Services

96160—Administration of patient-focused health risk assessment instrument

96161—Administration of caregiver-focused health risk assessment instrument

99201—New patient, brief

99202—New patient, limited

99203—New patient, moderate

99204—New patient, comprehensive

99205—New patient, extensive

99211—Established patient, brief

99212—Established patient, limited

99213—Established patient, moderate

99214—Established patient, comprehensive

99215—Established patient, extensive

99487—Complex chronic care management

99489—Complex chronic care management

99490—Chronic care management service

99495—Transitional care management within 14 days if discharge

99496—Transitional care management within 7 days of discharge

Initial nursing facility care (services that take place in a skilled nursing facility (i.e., on claims with a POS 31 indicator) are excluded)

99304—New or established patient, brief

99305—New or established patient, moderate

99306—New or established patient, comprehensive

Subsequent nursing facility care (services that take place in a skilled nursing facility (i.e., on claims with a POS 31 indicator) are excluded)

99307—New or established patient, brief

99308—New or established patient, limited

99309—New or established patient, comprehensive

99310—New or established patient, extensive

(continued)

[11] No exclusions for Modifier 95 and POS 11 or POS 2.

Table 1 (Continued): Primary Care Service Codes

Nursing Facility Discharge Services (services that take place in a skilled nursing facility (i.e., on claims with a POS 31 indicator) are excluded)

99315—New or established patient, brief

99316—New or established patient, comprehensive

Telehealth Visits[12]

G2010 – Remote Evaluation of Patient Video/Images

G2012 – Virtual Check-In

99421 – E-visit; 5-10 minutes

99422 – E-visit; 11-20 minutes

99423 – E-visit; 21 or more minutes

99441 – Telephone Evaluation and Management; 5-10 minutes

99442 – Telephone Evaluation and Management; 11-20 minutes

99443 – Telephone Evaluation and Management; 21 or more minutes

For RHCs, primary care services include services identified by HCPCS code G0402, G0438, or G0439 or one of the following revenue center codes:

0521 Clinic visit by member to RHC
0522 Home visit by RHC practitioner
0524 Visit by RHC practitioner to a member in a covered Part A stay at a SNF
0525 Visit by RHC practitioner to a member in a SNF (in a non-covered Part A stay), nursing facility, intermediate care facility, or other residential facility

Table 2 lists the specialty codes that define a primary care clinician for patient assignment purposes.

Table 2: Primary Care Clinician Specialty Codes

1	General practice
8	Family practice
11	Internal medicine
16	Obstetrics/Gynecology
37	Pediatric medicine
38	Geriatric medicine
50	Nurse practitioner
89	Clinical nurse specialist
97	Physician assistant

[12] These codes were added in the September 2, 2020 COVID-19 Interim Final Rule with Comment Period (IFC) (85 FR 54847) for purposes of patient assignment under MIPS and continue to be applied for the 2021 performance period due to the public health emergency pertaining to COVID-19.

The specialty codes shown in Table 3 are included in the definition of a physician used for MIPS patient assignment purposes.

Table 3: Physician Specialty Codes

01	General practice
02	General surgery
03	Allergy/immunology
04	Otolaryngology
05	Anesthesiology
06	Cardiology
07	Dermatology
08	Family practice
09	Interventional pain management
10	Gastroenterology
11	Internal medicine
12	Osteopathic manipulative therapy
13	Neurology
14	Neurosurgery
16	Obstetrics/gynecology
17	Hospice and palliative care
18	Ophthalmology
19	Oral Surgery
20	Orthopedic surgery
21	Cardiac electrophysiology
22	Pathology
23	Sports medicine
24	Plastic and reconstructive surgery
25	Physical medicine and rehabilitation
26	Psychiatry
27	Geriatric psychiatry
28	Colorectal surgery (formerly proctology)
29	Pulmonary disease
30	Diagnostic radiology
33	Thoracic surgery

(continued)

Table 3 (Continued): Physician Specialty Codes

34	Urology
35	Chiropractic
36	Nuclear medicine
37	Pediatric medicine
38	Geriatric medicine
39	Nephrology
40	Hand surgery
41	Optometry
44	Infectious disease
46	Endocrinology
48	Podiatry
66	Rheumatology
70	Multispecialty clinic or group practice
72	Pain management
76	Peripheral vascular disease
77	Vascular surgery
78	Cardiac surgery
79	Addiction medicine
81	Critical care (intensivists)
82	Hematology
83	Hematology/oncology
84	Preventive medicine
85	Maxillofacial surgery
86	Neuropsychiatry
90	Medical oncology
91	Surgical oncology
92	Radiation oncology
93	Emergency medicine
94	Interventional radiology
95	Gynecologist/oncologist
96	Unknown physician specialty
C0	Sleep medicine
C3	Interventional cardiology
C6	Hospitalist

(continued)

Table 3 (Continued): Physician Specialty Codes

C7	Advanced Heart Failure and Transplant Cardiology
C8	Medical Toxicology
C9	Hematopoietic Cell Transplantation and Cellular Therapy
D3	Medical Genetics and Genomics

The bill type codes in Table 4 (and any additional required information specified), identify CAH, RHC, FQHC, and ETA hospitals for MIPS patient assignment purposes.

Table 4: Part A Outpatient Bill Type Codes

CAH Method II claims	85x with the presence of one or more of the following revenue center codes: 096x, 097x, or 098x
RHC claims	71x
FQHC claims	77x
ETA claims	13x with the presence of an ETA CCN

3.4 Special Processing for Part A Outpatient Claims

Part A Outpatient claims submitted to Medicare by CAHs, FQHC, RHCs, and ETA hospitals require additional handling when used for assignment purposes. Part A Outpatient claims do not provide an allowed charges field as Part B Physician claims do, so allowed charges must be calculated. Part A Outpatient claims also do not provide physician specialty codes. The following describes how Part A Outpatient claims are handled with respect to these issues.

3.4.1 Processing CAH Claims

Professional services rendered by CAHs (including primary care services) are identified on Part A Outpatient claims by bill type 85x in conjunction with one or more of the following revenue center codes: 096x, 097x, and 098x.[13]

- A CAH service reported on an outpatient claim is considered a primary care service if the claim includes a HCPCS code that meets the definition of a primary care service.
- To identify the rendering clinician on CAH claims, CMS uses the Rendering Provider NPI field.[14] In the event that the Rendering Provider NPI field is blank, CMS uses the Other Provider NPI field. If the Other Provider NPI field is also blank, CMS uses the Attending Provider NPI field.

[13] These revenue codes are used to separate the professional fees from the facility fees on CAH claims.

[14] The rendering provider field is not consistently populated in outpatient claims.

- To identify the CMS specialty of the identified clinician on a CAH claim, CMS uses the Medicare Provider Enrollment, Chain, and Ownership System (PECOS).
- Allowed charges are calculated using the Revenue Center Rate Amount.

3.4.2 Processing FQHC and RHC Claims

FQHC and RHC services are also billed on Part A Outpatient claims. FQHCs are identified using bill type code 77x, and RHCs are identified using bill type code 71x.

- An FQHC or RHC service reported on an outpatient claim is considered a primary care service if the claim includes a HCPCS or revenue center code, as applicable, that meets the definition of a primary care service.[15]
- All primary care services billed by FQHCs and RHCs are assumed to have been performed by a primary care clinician. This helps ensure that there is not a disruption to the established relationships between patients and FQHCs or RHCs.
- Allowed charges are calculated using the Revenue Center Payment Amount.

3.4.3 Processing ETA Hospital Outpatient Claims

ETA professional services (including primary care services) are identified on outpatient claims by bill type 13x in conjunction with a CCN[16] that meets the conditions for ETA hospitals.

- An ETA hospital service reported on an outpatient claim is considered a primary care service if the claim includes a HCPCS code that meets the definition of a primary care service (Table 1).
- To identify the rendering clinician on ETA claims, CMS uses the Rendering Provider NPI field.[17] In the event that the Rendering Provider NPI field is blank, CMS uses the Other Provider NPI field. If the Other Provider NPI field is also blank, CMS uses the Attending Provider NPI field.
- To identify the CMS specialty of the identified physician/practitioner on an ETA claim, CMS uses the Medicare PECOS.
- Primary care services can be identified as line items in an ETA Part A Outpatient claim; however, no charges are allowed on the claim for these services, nor do these services otherwise appear on Part A Outpatient or Part B Physician claims.[18] Therefore, the line item HCPCS code primary care service will indicate that a primary care service was

[15] Note that the definition of "primary care service" varies for RHCs (see page 14).

[16] ETA hospitals use the same bill type code as other outpatient hospital departments. Requiring a specific CCN ensures that we are looking for services only at ETA hospitals.

[17] The rendering provider field is not consistently populated in outpatient claims.

[18] The ETA hospital bills CMS to recover facility costs incurred when ETA hospital physicians provide services. The physician services are reimbursed during settlement of the annual Medicare Cost Report for ETA hospitals.

rendered to a patient, but the allowed charges associated with that service will be computed on the basis of the Medicare Physician Fee Schedule (MPFS) in effect for the geographic area during the assignment period.