

The 2018 Merit-based Incentive Payment System (MIPS) Automatic Extreme and Uncontrollable Circumstances Policy

We established an automatic extreme and uncontrollable circumstances policy for the 2017 performance period for MIPS to reduce burden on clinicians affected by California wildfires and Hurricanes Harvey, Irma, Maria and Nate.

In the CY 2019 Medicare Physician Fee Schedule Final Rule, we finalized that this automatic policy will extend to future years of MIPS, beginning with the 2018 MIPS performance period so we can continue to reduce burden for MIPS eligible clinicians facing extreme and uncontrollable circumstances affecting entire regions or areas.

Who Does the Automatic Extreme and Uncontrollable Circumstances Policy Apply To?

The automatic extreme and uncontrollable circumstances policy applies to MIPS eligible clinicians who are located in a Centers for Medicare & Medicaid Services (CMS) designated region that has been affected by an extreme and uncontrollable event (such as FEMA-designated major disaster) during the 2018 MIPS performance period. Most recently, for those affected by [Hurricane Florence](#), [Hurricane Michael](#), and [California Wildfires](#) we've tried to lessen your burden by not requiring you to submit an application to reweight the performance categories under MIPS.

The automatic extreme and uncontrollable circumstances policy **does not apply to groups or virtual groups.**

- Groups and virtual groups that submit data will be scored according to existing MIPS scoring policies.
- The payment adjustment associated with their final score will be applied to all MIPS eligible clinicians in the group or virtual group, including those who qualify for the automatic extreme and uncontrollable circumstances policy.

How Does the Automatic Extreme and Uncontrollable Circumstances Policy Work?

We will identify MIPS eligible clinicians who are located in CMS-designated areas that have been affected by an extreme and uncontrollable circumstance based on the address associated with the clinician in the Provider Enrollment, Chain, and Ownership System (PECOS).

MIPS eligible clinician who are subject to the policy, all four performance categories will be weighted at zero percent (0%). You will automatically receive a score equal to the performance

threshold which will result in a neutral payment adjustment (neither a positive or negative adjustment) for the 2020 MIPS payment year unless:

- You submit data for two or more MIPS performance categories (Quality, Improvement Activities, and/or Promoting Interoperability) as an individual;
- You are part of a group or virtual group that submits data on behalf of its clinicians

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

MIPS Eligible Clinicians Scored under the APM Scoring Standard

In general, MIPS eligible clinicians in APM entities who are subject to the APM scoring standard are not covered by the automatic extreme and uncontrollable circumstances policy. However, a MIPS eligible clinician who is subject to the APM scoring standard and identified as affected by an extreme and uncontrollable circumstance may apply for an exception in the Promoting Interoperability performance category.

Frequently Asked Questions

How do I know if I'm in an area designated by CMS as being affected by an extreme and uncontrollable circumstance?

You can find information on our [Emergency Response and Recovery](#) page. We will also communicate information about the automatic extreme and uncontrollable circumstances policy through the Quality Payment Program website (qpp.cms.gov) and listservs.

What if I am part of a group or virtual group located in an area designated by CMS as affected by an extreme and uncontrollable circumstance? What if I am in a group where some, but not all, clinicians are located in designated areas?

If the entire group is not located in the designated area, but an individual MIPS eligible clinician is located in the designated area, the Automatic Extreme and Uncontrollable Circumstances Policy will apply to those individual clinicians only, in which CMS will assign a weight of zero percent (0%) in the MIPS final score, which will result in a neutral payment adjustment (neither a positive or negative adjustment) for the 2020 MIPS payment year, **unless** your group or virtual group submits data by the 2018 performance period submission deadline on your behalf.

A group or virtual group that chooses to submit data for the 2018 performance period will be scored according to the existing and applicable 2018 MIPS scoring policies.

Since the Automatic Extreme and Uncontrollable Circumstances Policy does not apply, groups and virtual groups can complete an extreme and uncontrollable circumstance application if the extreme and uncontrollable circumstance impacts the ability to collect data, at a group level, for

a specific MIPS performance category. For more information on this application, please visit the [Quality Payment Program website](#).

What happens if I am a MIPS eligible clinician covered by the automatic extreme and uncontrollable policy but still submit data?

That depends on how many performance categories you submit data for, as an individual.

- If you submit data for one performance category (or no data at all), you will receive a final score equal to the performance threshold and receive a neutral payment adjustment.
- If you submit data for two or three performance categories (Quality, Improvement Activities, and/or Promoting Interoperability), you will be scored on the performance categories for which you submitted data. Your payment adjustment will be determined by your final score.
- You will **not** be scored on the Cost performance category under the automatic extreme and uncontrollable circumstances policy.

Note this only applies to **individual submissions**.

If you are in a group or virtual group that submits data on behalf of all its clinicians, we will score the submission according to existing MIPS scoring policies and you will receive the group or virtual group's final score and payment adjustment.

What happens if I've submitted Medicare Part B claims prior to a triggering event for the automatic extreme and uncontrollable circumstances policy?

If a MIPS eligible clinician reports via Medicare Part B claims collection type for the quality performance category, and we receive data for the clinician prior to a triggering event for the automatic extreme and uncontrollable circumstances policy, their Medicare Part B claims data would only contribute to their final score if they also submit data for either the Promoting Interoperability or the improvement activities performance categories.

Where Can I Learn More?

- [Quality Payment Program](#)
- [2019 PFS final rule](#)
- [Federal Emergency Management Agency \(FEMA\) designated disaster areas](#)
- [CMS' Emergency Response and Recovery](#)
- [Exception Applications](#)

You can also contact the Quality Payment Program at 1-866-288-8292 (TTY 1-877- 715- 6222), Monday through Friday, 8:00 AM-8:00 PM ET or by email at: QPP@cms.hhs.gov.