



**apma** >



# MIPS White Glove – COVID-19 Relief

**Note: All information shared in this presentation is current as of September 15, 2020.**

# Objectives

- Discuss Extreme and Uncontrollable Circumstance Hardship Exception as it relates to COVID-19
- Understand what will happen if you claim hardship in all four (4) MIPS categories
- If you have not yet applied but are considering applying, determine which categories you might want to claim hardship



# **COVID-19 Hardship Exception Application**

# COVID-19 Hardship Exception Application

- June 29, 2020
  - CMS offered an COVID-19 option to the EUC exception
- Deadline for submission
  - December 31, 2020 8 PM EST
- You have the option to opt out of the MIPS categories
  - From 1 to all 4 categories (Quality, IA, PI, Cost)

# COVID-19 Hardship Exception Application

- To apply, log into the <https://qpp.cms.gov> portal

Quality Payment PROGRAM

MIPS Merit-based Incentive Payment System | APMs Alternative Payment Models | About The Quality Payment Program | Sign In Manage Account and Register

UPDATED | Quality Payment Program's response to COVID-19 (09/08/2020)

**PERFORMANCE YEAR 2019**  
**QPP Performance Feedback Is Available**  
Final performance feedback is available, including your final score and payment adjustment information. If you believe an error has been made, you can submit a targeted review until October 5, 2020 at 8:00 PM (EDT). Sign in to review your feedback or request a targeted review.  
[Sign in](#)

**PERFORMANCE YEAR 2021**  
**2021 QPP Proposed Rule**  
The 2021 QPP Proposed Rule is now available for viewing and commenting. Additional resources are available on the QPP Resource Library.

**Explore the 4 Phases of Participation**

- 1 **Collect Data**
- 2 **Report Data**
- 3 **Feedback Available**
- 4 **Payment Adjustment**

**PHASE 1**  
**Collect Data**  
Record quality data and how you used technology to support your practice. If an Advanced APM fits your practice, then you can join and provide care during the

# COVID-19 Hardship Exception Application

- To apply, log into the <https://qpp.cms.gov> portal

Quality Payment  
PROGRAM

MIPS ▾  
Merit-based Incentive  
Payment System

APMs ▾  
Alternative Payment  
Models

About ▾  
The Quality Payment  
Program

Sign In  
Manage Account  
and Register

Home >  
QPP Account

SIGN IN REGISTER

### Sign in to QPP

USER ID

User ID

PASSWORD

Password

☐ Show password

Forgot your user id or password? [Recover ID or reset password](#)

STATEMENT OF TRUTH

In order to sign in, you must agree to this: I certify to the best of my knowledge that all of the information that will be submitted will be true, accurate, and complete. If I become aware that any submitted information is not true, accurate, and complete, I will correct such information promptly. I understand that the knowing omission, misrepresentation, or falsification of any submitted information may be punished by criminal, civil, or administrative penalties, including fines, civil damages, and/or imprisonment.

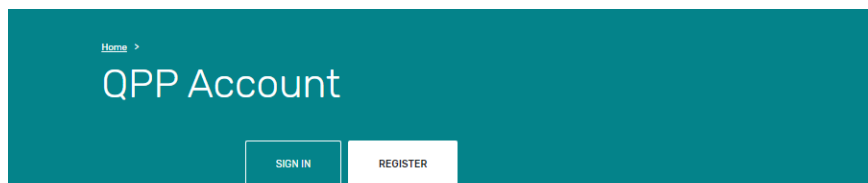
☐ Yes, I agree

Sign in > Don't have an account? Register

This warning banner provides privacy and security notices consistent with applicable federal laws, directives.

# COVID-19 Hardship Exception Application

- To apply, log into the <https://qpp.cms.gov> portal



## Register for QPP

The Quality Payment Program uses the HCQIS Access Roles and Profile (HARP) system for credential management. [Learn more about the QPP Access User Guide \(zip\)](#)



## What Happens Next?

You will be redirected to HARP to register. This process could take 5-15 minutes depending on how quickly your data is verified. HARP uses a third party service provided by Experian to verify your identity. This may require your social security number. [Learn more about the HARP identity proof process](#)



[Register with HARP >](#)

# COVID-19 Hardship Exception Application

- To apply, log into the <https://qpp.cms.gov> portal

Quality Payment PROGRAM

Wayne Singer

Account Home

Eligibility & Reporting

Performance Feedback

Exceptions Application

Targeted Review

Reports

Manage Access

Help and Support

Wayne Singer

Welcome back Wayne Singer!

Jan 2, 2020  
Submission Window is open

Apr 30, 2020  
Last Day to submit 2019 data

May 1, 2020  
Preliminary Performance Feedback Available

Aug 4, 2020  
Final Performance Feedback is available

Final 2019 Performance Feedback Available  
Your final 2019 performance year feedback is now available.  
VIEW FEEDBACK

2019 Submission Window has Closed  
As of Thursday, April 30th at 8 p.m. EDT, you are no longer able to submit your information, 2020 submission window will open January 2, 2021.  
VIEW ELIGIBILITY DETAILS

Exceptions Application  
We provide the opportunity to apply for exceptions to meeting MIPS program requirements when certain circumstances make it difficult for you to meet program requirements.  
START AN APPLICATION

Targeted Review  
You are able to view your in progress reviews or start a new request.  
VIEW REQUESTS

Manage User Access  
View which practices or APM Entities that you are currently connected to and your associated permissions.  
[View your access](#)



# COVID-19 Hardship Exception Application

- To apply, log into the <https://qpp.cms.gov> portal

The screenshot displays the Quality Payment Program (QPP) portal interface. At the top, there's a navigation bar with links for MIPS, APMS, About, and Wayne. The main header area shows the user's name, Wayne Singer, and a sidebar with navigation options like Account Home, Eligibility & Reporting, Performance Feedback, Exceptions Application, Targeted Review, Reports, Manage Access, and Help and Support. The central content area is titled "2020 QPP EXCEPTIONS" and "Progress Summary". It features a timeline with three key dates: May 4, 2020 (QPP Exception Application Opens), Dec 31, 2020 (QPP Exception Application Closes), and Feb 28, 2021 (Approved applications and performance category reweighting displayed on qpp.cms.gov). A yellow banner indicates the "Current Activity Period: 2020 QPP Exception Application window is open" and states that the window is now open, with a deadline of December 31, 2020 8PM EST, and 108 days left. Below this, there's a section for "YOUR QPP EXCEPTIONS (2)" with a button to "ADD NEW QPP EXCEPTION". A red arrow points to the "ADD NEW EXCEPTION" button. At the bottom, there's a link to "Sign up now" to help shape the future of QPP.

# COVID-19 Hardship Exception Application


## Add New Exception

Exception Type \* ?

☐ Promoting Interoperability Hardship Exception

MIPS eligible clinicians, groups, and virtual groups may submit a Promoting Interoperability Hardship Exception Application citing one of the following specified reasons:

- You're a small practice
- You have decertified EHR technology
- You have insufficient Internet connectivity
- You face extreme and uncontrollable circumstances such as disaster, practice closure, severe financial distress or vendor issues
- You lack control over the availability of CEHRT

 ☐ Extreme and Uncontrollable Circumstances Exception

The Extreme and Uncontrollable Circumstances application is reserved for instances where there is indeed an Extreme and Uncontrollable Circumstance, such as a **natural disaster, public health emergency or other significant event**, that prevents collecting data for an extended period of time, or that could impact performance on cost measures.

**All other events such as vendor issues, decertification of EHR, etc. should be filed as a Promoting Interoperability Hardship Exception.**

CANCEL

CONTINUE >

## Change Submission Information

Application Type: \* ? Individual [Don't Change](#)

☐ Individual

☒ Group 

☐ Virtual Group

Group TIN \* ? 

CANCEL

SAVE

# COVID-19 Hardship Exception Application

&UC: Individual)  

## Submission Information

### Individual Details

Clinician NPI

[Change](#)

Clinician's Name

Clinician Type

Doctor of Podiatric Medicine

Group Practice Name \* 

▼


### Submitter Details

Contact Information \* 

Phone Number

Ext. (Optional)


Email

Submitter/Third Party Intermediary Relationship \* 

Please specify

▼

### Additional Access

Additional Staff Access Email(s) 

Enter email address(es)

Hit enter/comma after each entry to add multiple

## Extreme and Uncontrollable Circumstances Details

# COVID-19 Hardship Exception Application



## Extreme and Uncontrollable Circumstances Details

\* Required

### Event Type \*

- ☒ COVID-19
- ☐ Natural Disaster
- ☐ Ransomware / Malware
- ☐ Medical Issue
- ☐ Other

### Event Date Range \*

Start Date  To End Date 

☐ Event Still Persists

### Event Description \*

Enter a brief description of the event

**My/Our practice was severely impacted by the COVID-19 crisis. As a result this practice is unable to successfully document the MIPS related data and measures for this performance year.**

### Performance Category Affected \*

- ☐ Quality
- ☐ Promoting Interoperability
- ☐ Improvement Activities
- ☐ Cost

WITHDRAW

SUBMIT FOR REVIEW >

# COVID-19 Hardship Exception Application

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%
<b>Reweight 1 Performance Category</b>				
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%
<b>Reweight 2 Performance Categories</b>				
No Cost <b>and</b> No Promoting Interoperability	85%	0%	15%	0%
No Cost <b>and</b> No Quality	0%	0%	15%	85%
No Cost <b>and</b> No Improvement Activities	70%	0%	0%	30%
No Promoting Interoperability <b>and</b> No Quality	0%	50%	50%	0%
No Promoting Interoperability <b>and</b> No Improvement Activities	85%	15%	0%	0%
No Quality <b>and</b> No Improvement Activities	0%	15%	0%	85%

# COVID-19 Hardship Exception Application

Report the following for any 90 continuous days

- Improvement Activities
  - 1 to 4 measures (High-weight 20 points; Medium-weight 10 points)
- Promoting Interoperability
  - Security Risk Analysis (MUST DO)
  - e-Rx – Exemption if less than 100 in a 90-days
  - Send and or Receive a C-CDA electronically – Referrals
    - Exemption if less than 100 of either in 90-days
  - Provide Patient Access to the portal (MUST DO)
  - Public Health – Claim two exemptions of the 5 measures

# COVID-19 Hardship Exception Application

**What if data is submitted for the performance categories that were approved.**

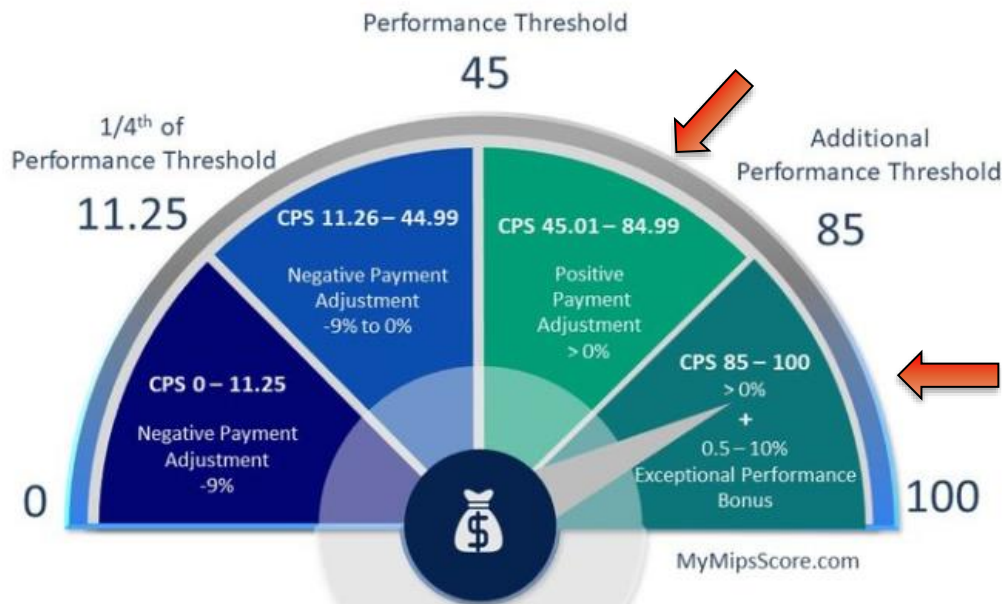
- **Data submission will override the category approved reweighting through your application on a category-by-category basis.**
  - **For example<sup>\*</sup>: A MIPS eligible clinician, submits an application to have all four performance categories reweighted, but later you determine you are able to collect and submit data for the Improvement Activities and Promoting Interoperability performance categories.**
  - **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 the performance category will retain a 0% weight because there are no data submission requirements associated with the Cost performance category.**

<sup>\*</sup>Source: CMS EUC Fact Sheet

# COVID-19 Hardship Exception Application

## Incentive Potential

### MIPS 2020: Payment Adjustment



### MIPS EUC Scoring

- Quality = 0 from 45
- Cost = 0 from 15
- IA = 15
- PI = 85 (25 + 45 + 15)

PI + Qual + Cost

### MIPS Composite Score 85+

Eligible for the Exceptional Performance Bonus of 0.5% to 10%

- 45.01 – 84.99 Cost Neutral budget
- 85 -100 Exceptional Performance Budget



# COVID-19 Hardship Exception Application

## Incentive Potential – Example

MIPS Eligible Provider - \$100,000

- Doing Nothing = 9% penalty
  - \$9,000
- MIPS Composite Score 85+
  - Incentive 0.5 to 10%
  - \$500 to \$10,000

**A range from: -\$9,000 to \$10,000**

### MIPS EUC Scoring

- Quality = 0 from 45
  - Cost = 0 from 15
  - IA = 15
  - PI = 85 (25 + 45 + 15)
- PI + QA + Cost

### MIPS Composite Score 85+

Eligible for the Exceptional  
Performance Bonus of 0.5 to 10%

- 45.01 – 84.99 Cost Neutral budget
- 85 -100 Exceptional Performance Budget

# COVID-19 Hardship Exception Application

## Key Take-Aways

- Review the 2020 QPP EUC [Fact Sheet](#)
- Determine your circumstances
- An EUC Exception must be filed by December 31, 2020
  - Doing nothing will result in a 9% penalty
- Select the MIPS performance categories to opt out
- Focus on PI and IA for the last quarter of 2020
- Submit your data for MIPS 2020 by March 31, 2021



apma>



Questions?

# COVID-19 Hardship Exception Application

## Thank You

For additional assistance contact:

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