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](https://qpp.cms.gov) portal
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COVID-19 Hardship Exception Application

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

Change Submission Information

- Application Type: Individual
- Group TIN

CANCEL  CONTINUE  SAVE
COVID-19 Hardship Exception Application

Submission Information

Individual Details

Clinician NPI
Clinician's Name
Clinician Type
Doctor of Pediatric 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)

Extreme and Uncontrollable Circumstances Details
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.
# COVID-19 Hardship Exception Application

<table>
<thead>
<tr>
<th>Performance Category Reweighting Scenario</th>
<th>Quality Category Weight</th>
<th>Cost Category Weight</th>
<th>Improvement Activities Category Weight</th>
<th>Promoting Interoperability Category Weight</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Reweighting Applies</td>
<td>45%</td>
<td>15%</td>
<td>15%</td>
<td>25%</td>
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<tr>
<td><strong>Reweight 1 Performance Category</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Cost</td>
<td>55%</td>
<td>0%</td>
<td>15%</td>
<td>30%</td>
</tr>
<tr>
<td>No Promoting Interoperability</td>
<td>70%</td>
<td>15%</td>
<td>15%</td>
<td>0%</td>
</tr>
<tr>
<td>No Quality</td>
<td>0%</td>
<td>15%</td>
<td>15%</td>
<td>70%</td>
</tr>
<tr>
<td>No Improvement Activities</td>
<td>60%</td>
<td>15%</td>
<td>0%</td>
<td>25%</td>
</tr>
<tr>
<td><strong>Reweight 2 Performance Categories</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Cost and No Promoting Interoperability</td>
<td>85%</td>
<td>0%</td>
<td>15%</td>
<td>0%</td>
</tr>
<tr>
<td>No Cost and No Quality</td>
<td>0%</td>
<td>0%</td>
<td>15%</td>
<td>85%</td>
</tr>
<tr>
<td>No Cost and No Improvement Activities</td>
<td>70%</td>
<td>0%</td>
<td>0%</td>
<td>30%</td>
</tr>
<tr>
<td>No Promoting Interoperability and No Quality</td>
<td>0%</td>
<td>50%</td>
<td>50%</td>
<td>0%</td>
</tr>
<tr>
<td>No Promoting Interoperability and No Improvement Activities</td>
<td>85%</td>
<td>15%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>No Quality and No Improvement Activities</td>
<td>0%</td>
<td>15%</td>
<td>0%</td>
<td>85%</td>
</tr>
</tbody>
</table>
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
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*: 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 performance category will retain a 0% weight because there are no data submission requirements associated with the Cost performance category.

*Source: CMS EUC Fact Sheet
COVID-19 Hardship Exception Application

Incentive Potential

MIPS EUC Scoring

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

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
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)

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
Questions?
COVID-19 Hardship Exception Application

Thank You

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Analyze Measures & Performance
Estimate & Maximize Incentives
Submit via CMS Qualified Registry