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CMS Issues Regulatory Relief for MIPS Performance Year 2019 Due to COVID-19

In light of the current public health emergency, CMS recently extended the 2019 Merit-based Incentive Payment System (MIPS) data submission deadline 30 days to April 30, 2020. Clinicians who have already submitted data, or will be submitting data by the new deadline of April 30th, will be scored and receive a MIPS payment adjustment based on the data submitted. Final scores are expected to be issued mid-summer of 2020.

- ✓ Remember, the MIPS Payment Year follows the Performance Year by 2 years so these providers will see those payment adjustments applied in 2021.

Now, under the *Automatic Extreme and Uncontrollable Circumstances Policy*, MIPS-eligible clinicians who have **not submitted any MIPS data by April 30, 2020**, will be automatically identified to receive a neutral payment adjustment for the 2019 performance year and will not incur penalties for not having reported for the program year. To achieve the neutral payment adjustment, clinicians in this scenario will have all 4 performance categories reweighted to 0% and will receive a MIPS final score equal to the performance threshold.

- ✓ Note, if an automatically identified clinician/group has been determined to have submitted data on **2 or more performance categories** (Quality, Improvement Activities, etc.), he/she/the group will be scored on those categories and will receive a payment adjustment within the normal rules of the program.

APS works closely with our clients throughout each MIPS performance year to ensure ongoing, optimal and complete data submissions for the MIPS program through collaboration with our contracted data registry. As such, we had already approved final submission status for each of our participating clients in keeping with the original deadline so we fully expect them to be eligible for final scoring of their full data sets per the usual program course come summer.

So what about the 2020 MIPS Performance Year?

CMS is monitoring the COVID-19 public health emergency for potential impact on the program for the 2020 performance year and will provide updated guidance and changes as they are developed.

In the meantime, APS has already begun generating our clients' quality data for the 2020 performance year per our normal billing processes. We will continue monitoring industry feedback and program requirements for any changes and provide updates as developments occur.

For additional details regarding the 2019 performance year extension, please review:

<https://www.cms.gov/files/document/guidance-memo-exceptions-and-extensions-quality-reporting-and-value-based-purchasing-programs.pdf>

Questions regarding this information can be directed to your APS Practice Manager or MIPSInfo@apsmedbill.com.