



Facility-Based Measurement for MIPS Performance Year 2021

Updated: December 10, 2021

Background of the Issue

The Centers for Medicare and Medicaid (CMS) introduced facility-based reporting for quality and cost measures in 2019 of the Merit-based Incentive Payment System (MIPS). This option allows providers to receive a score in their Quality and Cost categories based on their hospital's performance in the Hospital Value-Based Purchasing (HVBP) Program. CMS automatically calculates the score for qualifying groups and providers. *Most hospitalists in the MIPS are eligible for facility-based measurement.*

However, due to the on-going reporting flexibilities and disruptions to quality reporting arising from COVID-19, CMS will not be providing hospitals with a HVBP Total Performance Score in FY 2022. Since the MIPS facility-based reporting option relies on the HVBP Total Performance Score, **CMS is unable to calculate a MIPS facility-based score for the 2021 Performance Year.**

What is SHM Doing?

SHM raised this issue with CMS and asked them to consider making the Extreme and Uncontrollable Circumstances exception (EUC) automatic for providers who would have otherwise used the facility-based measurement for their MIPS scores. In response, CMS updated their policy to apply an automatic EUC policy for all individual MIPS eligible clinicians. We continue to work with CMS on this issue for future years.

What You Can Do Now

UPDATED: CMS will apply the automatic Extreme and Uncontrollable Circumstances policy for individual MIPS eligible clinicians in 2021 due to the on-going COVID-19 public health emergency. You do not need to do anything for this exception to apply.

If your or your group has already submitted Improvement Activities, quality measures or any other MIPS data to CMS but you would like to request an exception for 2021, you can still submit an EUC exception application, citing "COVID-19" as the triggering event.

The [Extreme and Uncontrollable Circumstances Exception](#) application allows you to request reweighting for any or all performance categories if you encounter an extreme and uncontrollable circumstance or public health emergency, such as COVID-19, that is outside of your control.

The extreme and uncontrollable circumstances exception application deadline is December 31, 2021.

For more information:

- CMS Resources for Performance Year 2021: [Automatic Extreme and Uncontrollable Circumstances Policy](#) (downloads a PDF)
- CMS QPP Resource Library: [2021 Facility-Based Quick Start Guide](#) (downloads a PDF)
- [CMS Extreme and Uncontrollable Circumstances Exception 2021 webpage](#)