



Quality Payment Program (QPP): COVID-19 Flexibilities, Exemptions, Delayed Reporting Timelines, and New Improvement Activity

Updated April 28, 2020

The Centers for Medicare and Medicaid (CMS) announced administrative relief and reporting flexibilities for providers participating in the Quality Payment Program.

2019 Performance Year Data Submission (2021 Payment Adjustments)

The MIPS Performance Year 2019 reporting deadline is extended through April 30, 2020.

- *Clinicians reporting as individuals in the MIPS:* For individual clinicians who do not report data by April 30th, they will fall into the automatic MIPS Extreme and Uncontrollable Circumstances policy. Clinicians have their performance categories reweighted and will receive a neutral payment adjustment. This includes hospitalists who qualify for facility-based reporting but do not report on the Improvement Activities category.
- *Group reporting in the MIPS:* Groups are not eligible for the automatic Extreme and Uncontrollable Circumstances policy. Groups that submit data to CMS will continue to be scored normally, unless the group submits an Extreme and Uncontrollable Circumstances application. Groups that did not submit any MIPS data will not be considered a group and the individual clinicians may be eligible for the automatic MIPS Extreme and Uncontrollable Circumstances policy.

CMS has reopened the [MIPS Extreme and Uncontrollable Circumstances application](#) and extended the deadline to April 30th. Individual clinicians, groups, and virtual groups that already began submitting data but will be unable to complete their data submissions should submit an application. Any application submitted in between April 3, 2020 and April 30, 2020 will override any previous data submission.

CMS has created the *COVID-19 Clinical Trial* improvement activity in the Merit-based Incentive Payment System (MIPS). This improvement activity is designed to encourage clinicians to participate in COVID-19 clinical research trials and data reporting. Participating clinicians can earn credit by participating in a COVID-19 clinical trial that utilizes a drug or biological product to treat a patient with a COVID-19 infection. Clinicians must also report their findings through a clinical data repository or clinical data registry for the duration of their study. To learn more about the COVID-19 Clinical Trials improvement activity, [click here](#).

2020 Performance Year (2022 Payment Adjustments)

CMS is currently weighing options around additional relief efforts for the data submission for 2020. SHM expects the 2021 Physician Fee Schedule and Quality Payment Program Rule to contain information about any changes to the 2020 MIPS Performance Year submission requirements.

Additional Resources from CMS:

- [Press Release: Trump Administration Champions Reporting of COVID-19 Clinical Trial Data through Quality Payment Program, Announces New Clinical Trials Improvement Activity](#)



- [Quality Payment Program-COVID-19 Fact Sheet](#)
- [MIPS Extreme and Uncontrollable Circumstances Application](#)
- [QPP Participation Status Tool](#)
- [CMS Announces Relief for Clinicians, Providers, Hospitals and Facilities Participating in Quality Reporting Programs in Response to COVID-19](#)