

# Merit-based Incentive Payment System (MIPS)

2022 Extreme and Uncontrollable Circumstances Exception Application Guide



Contents Already know what MIPS is? Skip ahead by clicking the links i Contents.		the Table o
How to Use This Guide		3
Extreme and Uncontrollable Circumstances	Application Overview	5
Extreme and Uncontrollable Circumstances	Application Process:	13
Extreme and Uncontrollable Circumstances	Application Process:	16
Help, Resources, Glossary, and Version Histo	ory	29
<u>Appendices</u>		33



# How to Use This Guide



### How to Use This Guide



### **Table of Contents**

The table of contents is **interactive**. Click on a chapter in the table of contents to read that section.



You can also click on the icon on the bottom left to go back to the table of contents.

**Please note:** This guide was prepared for informational purposes only and isn't intended to grant rights or impose obligations. The information provided is only intended to be a general summary. It isn't intended to take the place of the written law, including the regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

# **Hyperlinks**

Hyperlinks to the <u>Quality Payment Program website</u> are included throughout the guide to direct the reader to more information and resources.

**Purpose:** This guide will provide general information about the Extreme and Uncontrollable Circumstances (EUC) Exception application and provide step-by-step instructions on how to complete the application.

### **Overview**

We understand that there may be circumstances out of your control that make it difficult for you to meet program requirements. To reduce this burden, we provide an opportunity for qualifying clinicians, groups, virtual groups and Alternative Payment Model (APM) Entities to apply for performance category reweighting for MIPS.

What	The MIPS Extreme and Uncontrollable Circumstances (EUC) Exception application allows you to request reweighting for one or more performance categories to 0%.
vvnat	See <u>Appendix A1</u> , <u>Appendix A2</u> , and <u>Appendix B</u> for more information on performance category reweighting in traditional MIPS and the APM Performance Pathway (APP).
Who	<ul> <li>Individual clinicians, groups, virtual groups, and APM Entities</li> <li>Third Party Intermediaries can submit an application with permission from the clinician or practice.</li> </ul>
Why	<ul> <li>You can submit an application to have your MIPS quality, cost, improvement activities, and/or Promoting Interoperability performance categories reweighted to 0% if: <ul> <li>You experience an extreme and uncontrollable circumstance outside of your control, such as a natural disaster, ransomware attack or public health emergency (PHE) (e.g. COVID-19 pandemic), that prevents you from collecting data for an extended period of time, or that could impact your performance on cost measures.</li> </ul> </li> <li>Note: APM Entities are required to request reweighting for all performance categories.</li> </ul>
When	<b>UPDATE:</b> The EUC Exception application to allow individuals, groups, virtual groups, and APM Entities the opportunity to request performance category reweighting due to the COVID-19 PHE deadline has been extended until 8 p.m. ET on March 3, 2023.
Where	Sign in to <u>qpp.cms.gov</u> with your HCQIS Access and Roles Profile (HARP) account. You must have a HCQIS Access Roles and Profile (HARP) account to complete and submit an exception application. For more information on HARP accounts, please refer to the <b>Register for a HARP Account</b> document in the <u>QPP Access User Guide (ZIP)</u> . <b>Note:</b> APM Entity representatives must have the Security Official role in order to complete the Extreme and Uncontrollable Circumstances exception application on behalf of their entity. Refer to the Connect to an Organization document in the <u>QPP Access</u> <u>User Guide (ZIP)</u> .
How	<ol> <li>Register for a HARP account</li> <li>Sign in to <u>qpp.cms.gov</u></li> <li>Select 'Exceptions Applications' on the left-hand navigation</li> <li>Select 'Add New Exception'</li> <li>Select 'Extreme and Uncontrollable Circumstances Exception'</li> <li>Complete the application for individual, group, virtual group, or APM Entity participation</li> </ol>

# Quality Payment

### **Policies for Individual Clinicians, Groups, and Virtual Groups**

# EUC applications can be submitted for one or more performance categories.

 Any performance category that isn't included in the application is eligible for scoring, even if no data are submitted, unless the clinician or group qualifies for reweighting under another policy.

#### Any data you submit, or is submitted on your behalf, will override reweighting for that performance category and the category will be scored.

- If you later determine that you're able to collect data for a performance category approved in your application, you can submit that data and it will be scored.
- If the cost performance category is included in the application, cost measures won't be scored even if data is submitted for other performance categories.
- If you submit Medicare Part B Claims measures during the performance year, this will override quality performance category reweighting. However, if you request and are approved for reweighting in all 4 performance categories and don't submit data for another performance category, your MIPS final score for the 2022 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2024.

#### You must be scored on at least 2 performance categories to earn a MIPS final score other than the performance threshold.

When fewer than 2 performance categories can be scored (meaning 1 performance category is weighted at 100% of your MIPS final score, and the other performance categories are weighted at 0%), the MIPS final score for the 2022 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2024.

You will be scored in any performance category that's not included in your application, unless you qualify for reweighting through another policy.

#### For example:

- If you don't meet the case minimum for any cost measures, the cost performance category will be reweighted.
- You qualify for reweighting under the automatic Extreme and Controllable Circumstances policy.
  - Review the 2022 Automatic Extreme and Uncontrollable Circumstances Fact Sheet (PDF) for additional information.
- Certain clinician types and individuals, groups, and virtual groups with certain special statuses qualify for automatic reweighting of the Promoting Interoperability performance category.
  - For additional information on automatic reweighting on Promoting Interoperability, review the <u>2022</u> <u>Promoting Interoperability Quick Start Guide (PDF)</u>.

### Intersection Between the Automatic EUC Policy and the Application-Based EUC Policy

If you qualify for reweighting under the automatic EUC policy, then we'll reweight all 4 performance categories to 0% (rather than just the categories included in your EUC application). We'll score any performance category for which data is submitted.

#### Example

Scenario	Outcome
A MIPS eligible clinician who is eligible for the automatic EUC policy has also submitted an EUC-exception application. The application was approved for reweighting in the Promoting Interoperability performance category, and the clinician submits data for the quality and improvement activities performance categories.	<ul> <li>You will be scored as follows:</li> <li>The quality and improvement activities performance categories will be scored because you submitted data for those categories</li> <li>The cost performance category is reweighted to 0% under the automatic EUC policy.</li> <li>The Promoting Interoperability performance category is also reweighted to 0% under the automatic EUC policy.</li> <li>Note, in this example, the EUC application wasn't needed to reweight the Promoting Interoperability performance category due to the automatic EUC policy.</li> </ul>

## Individual Clinicians, Groups, and Virtual Groups Reporting Via Traditional MIPS

#### Example

Scenario	Outcome
You're a MIPS eligible clinician (or group or virtual group) that is planning to report via <b>traditional MIPS</b> . You submit an application to have all 4 performance categories reweighted, but later determine you are able to report the improvement	<ul> <li>You will receive a MIPS final score based on the data submitted.</li> <li>The improvement activities performance category will be weighted at 15%.</li> <li>The Promoting Interoperability performance category will be weighted at 85%.</li> <li>The quality performance category will retain a 0% weight</li> </ul>
activities and Promoting Interoperability performance categories.	<ul> <li>because you didn't submit quality data.</li> <li>The cost performance category will retain a 0% weight because there are no data submission requirements associated with the cost performance category (reweighting can't be voided).</li> </ul>

## **Individual Clinicians and Groups Reporting Via APP**

### Example

Scenario	Outcome
	You will receive a MIPS final score based on the data submitted.
You're a MIPS eligible clinician (or group) planning to report via the <b>APP</b> . You submit an application to reweight the quality performance category and your application was approved.	<ul> <li>The improvement activities performance category will be weighted to 25%.</li> <li>The Promoting Interoperability performance category will be weighted to 75%.</li> <li>The quality performance category will be weighted at 0% provided no data is submitted.</li> <li>The cost performance category will retain a 0% weight (because cost isn't scored under the APP).</li> </ul>

### **APM Entities**

**APM Entities** 

APM Entities in the following models can submit an EUC application on behalf of their MIPS eligible clinicians:

- Medicare Shared Saving Program
- Vermont Medicare ACO Model
- Bundled Payments for Care Improvement (BPCI) Advanced Model
- Oncology Care Model (OCM)
- Maryland Total Cost of Care
- Independence at Home Demonstration
- Primary Care First (PCF)
- Value in Opioid Use Disorder Treatment (ViT)
- Direct Contracting (DC)
- Comprehensive Care for Joint Replacement (CJR) Payment
- Kidney Care Choices (KCC)

### **APM Entities** (continued)

#### APM Entity applications must be submitted for all performance categories.

- You can't submit an application for an APM Entity to request reweighting in 1 or 2 performance categories.
- This is different from our policy for individual, group, and virtual group applications.

# If your APM Entity's application is approved, the APM Entity will receive a final score equal to the performance threshold even if data are submitted for the APM Entity.

- The MIPS eligible clinicians in the APM Entity will receive a neutral MIPS payment adjustment unless they have a higher final score from individual or group participation.
- Data submitted for an APM Entity will not override performance category reweighting from an approved application.
- This is different from our policy for individual, group, and virtual group applications.

# At least 75% of MIPS eligible clinicians in an APM Entity must qualify for reweighting of the Promoting Interoperability performance category.

- Given that APM Entities are required to request reweighting for all performance categories in their EUC application, at least 75% of the MIPS eligible clinicians in the Entity will need to qualify for reweighting in the Promoting Interoperability performance category.
- They may qualify automatically or by meeting one of the criteria for the <u>MIPS Promoting Interoperability Hardship</u> <u>Exception</u>.

# APM Entity representatives must have a QPP Security Official role to complete the Extreme and Uncontrollable Circumstances exception application on behalf of their entity.

 Review the Connect to an Organization resource in the <u>QPP Access User Guide (ZIP)</u> for more information on obtaining the Security Official role.

#### An approved application won't affect your model-specific reporting requirements.

• For example, Shared Savings Program ACOs must report the quality measures identified under the APP to meet their requirements under the Shared Savings Program, unless otherwise excepted under that APM.

Extreme and Uncontrollable Circumstances Application Process: Frequently Asked Questions

# **Extreme and Uncontrollable Circumstances Application Process: Frequently Asked Questions**

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### **How Does CMS Assess EUC Application Requests?**

We consider the variables affecting your ability to collect and submit data for each performance category when reviewing your application for performance category reweighting due to extreme and uncontrollable circumstances.

During our review, we will review both the event circumstances and the length of time you were impacted as indicated in your application to assess the ability of a MIPS eligible clinician to submit data for each performance category selected in the application.

#### **Example:**

The performance period for an improvement activity is a continuous 90-day period (or as specified in the activity description) whereas the performance period for the quality performance category is 12 months. An issue lasting 3 months may have more impact on the availability of measures for the quality performance category than your ability to perform and attest to improvement activities.

# **Extreme and Uncontrollable Circumstances Application Process: Frequently Asked Questions**

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#### How Long Does it Take to Process an EUC Exception Application?

• The length of time it takes to process application requests depends on the volume of requests we receive. We review all application requests in the order that they were received. Once a decision is made regarding your application, you will receive a notice of our decision and the status of your application will be reflected in your QPP Account on <u>app.cms.gov</u>.

#### Where Can I Look for a Status Update on My EUC Exception Application?

• You can monitor your application status in your QPP Account on <u>app.cms.gov</u>.

#### Are We Required to Submit Documentation with Our EUC Exception Application?

- No, you aren't required to submit documentation with your application.
- However, you should retain documentation of the circumstances supporting your application for your own records in the event that you are selected by CMS for data validation or an audit. See our <u>2022 MIPS Data Validation Criteria Guide (ZIP)</u> for information on the data validation and audit process.

#### How Can I Correct a Mistake Made on Our EUC Exception Application?

 If you identified an error with your exception application, please contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8 a.m.-8 p.m. ET or by e-mail at: <u>QPP@cms.hhs.gov</u>.

#### Can Additional Staff Members Access/Receive Notifications About the Status of Our EUC Exception Application?

- Yes, you can add additional staff or representatives who should receive notifications about the status of the application.
- In the **Additional Access** section of the application, provide the email address(es) of additional staff or representatives who would like to receive email notifications.
- Please note that the additional staff or representatives must have a HARP credentials in order to see the application in qpp.cms.gov.

**Important Note:** Corrections can't be made after the application period has closed.

### **Step 1: Sign in to Your QPP Account**

Sign in to your QPP Account at <u>qpp.cms.gov</u> with your HARP credentials.

**Note:** If you haven't signed into <u>app.cms.gov</u> before, you must register for an account to obtain your HARP credentials.

Sign in Regi	ster
Sign in	to QPP
UserID	
PASSWORD	
Password	
Show password	
Forgot your user	r id or password? Recover ID or reset password
	ntative of a Shared Savings Program ACO and can access the ACO Management Syste u can sign in to OPP using the same User ID and Password.
STATEMENT OF TRU	тн
that will be subm is not true, accur	n, you must agree to this: I certify to the best of my knowledge that all of the information itted will be true, accurate, and complete. If I become aware that any submitted information ate, and complete, I will correct such information promptly. I understand that the knowing resentation, or falsification of any submitted information may be punished by criminal, civil, penalties, including fines, civil damages, and/or imprisonment.

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### **Step 2: Navigate to Your Exception Applications**

Once you are signed into your account select:

 The Exception Application tab in the left-hand navigation menu, then click + Add New QPP Exception

#### OR

• The **Start an Application** quick link on the home page.

We've extended the 2022 MIPS EUC Exception application to allow individuals, groups, virtual groups, and APM Entities to submit an application requesting MIPS performance category reweighting due to the ongoing COVID-19 PHE. 2022 MIPS EUC Exception applications citing COVID-19 as the triggering event can be submitted until 8 p.m. ET on Friday, March 3, 2023.



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### **Step 3: Select Extreme and Uncontrollable Circumstances Exception**

Select the **Extreme and Uncontrollable Circumstances** Exception, then click **Continue**.

#### Add New Exception

#### Exception Type \*

MIPS Promoting Interoperability Performance Category Hardship Exception

The MIPS Promoting Interoperability Performance Category Hardship Exception applications allows you to request reweighting specifically for the Promoting Interoperability performance category if you qualify for one of the reasons identified below.

- You are 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 Exception application allows you to request reweighting for any or all performance categories if you encounter and extreme and uncontrollable circumstance or public health emergency, such as COVID-19, that is outside of your control.

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

CANCEL ( CONTINUE >

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### **Step 4: Select Application Type**

Select the **participation level** at which you intend (or intended) to participate in MIPS.

<ul> <li>Add New Extreme and Uncontrollable Circumstances Application</li> </ul>
Application Type: * 🕐
Individual
Group
Virtual Group
APM Entity
Clinician NPI * 🕐
e.g. 1234567890
CANCEL SAVE SAVE & CONTINUE >

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### **Step 5: Enter Participation Level Information**

Enter the required participation level information.

The required information for each participation level is as follows:

Participation Level	Required Information
Individual Clinician	<ul> <li>National Provider Identifier (NPI)</li> <li>Practice Affiliation</li> </ul>
Group	<ul> <li>Taxpayer Identification Number (TIN)</li> </ul>
Virtual Group APM Entity	<ul><li>Virtual Group Identifier</li><li>APM Entity ID</li></ul>

**Note:** If you're an individual clinician, group, or virtual group requesting reweighting of only 1 or 2 MIPS performance categories and intend to submit data for others, it is critical that you select the application type that aligns with the level at which you intend to submit data to MIPS (i.e. at the individual, group or virtual group level).

PY 2022 OPP EXCEPTION ID: 2700		All changes saved     SAVE & CLOSE
Individual Details		
Clinician NPI	Clinician's Name	Clinician Type
0839723588 Change	Brenda Drerenberger	Doctor of Medicine
Group Practice Name * ⑦		
Select	~	
Select		
Pfeffer Group (TIN: *****9403)		
Notlisted		

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### **Step 6: Enter Submitter Details**

Enter your **contact information** (as the submitter) and identify your **relationship to the party** identified in the application.

PY 2022 OPP EXCEPTION ID: 2706 VIEW/ADD COMMENTS EUC Application - BD (E&UC: Individual)	✓ All changes saved SAVE & CLOSE
Submitter Details	
Contact Phone Number * ⊘	
Phone Number 866-288-8292 Ext. (Optional)	
Contact Email Address * ⑦	
Email janedoe@pfeffergroup.com	
Submitter/Third Party Intermediary Relationship *	
Please specify	
Please specify	
Clinician	
Consultant	
Physician Staff	
Registry / QCDR	
EHR Vendor	
Other	

### **Step 7: Enter Additional Staff in the Additional Access Section**

You can identify additional users to receive notifications about the application in the Additional Access section.

If there's a HARP account associated with the email address(es) you provide, the person will be able to sign in to their QPP Account on <u>qpp.cms.gov</u> and access the application.

PY 2022 QPP EXCEPTION ID: 2706 VIEW/ADD COMMENTS   EUC Application - BD (E&UC: Individual)	✓ All changes saved SAVE & CLOSE
Additional Access	
Additional Staff Access Email(s) ⑦	
johndoe@pfeffergroup.com × jackdoe@pfeffergroup.com × Enter email address(es)	
Hit enter/comma after each entry to add multiple	

### **Step 8: Enter the Extreme and Uncontrollable Circumstances Event Type**

Select the appropriate **Event Type** for the extreme and uncontrollable circumstance you experienced.

Then, enter the timeframe for which you were impacted by the extreme and uncontrollable event by completing the **Event Date Range**. If you continue to be impacted by the event, select **Event Still Persists**.

PY 2022 QPP EXCEPTION ID: 2706       VIEW/ADD COMMENTS         EUC Application - BD       (E&UC: Individual)
Extreme and Uncontrollable Circumstances Details
Event Type * ⑦
COVID-19
Natural Disaster
Ransom / Malware
Medical Issue
Other
Event Date Range * ⑦ Start Date *  TO End Date *
Event Still Persists
Event Description * 🕐
Enter a brief description of the event
6000 characters remaining

### Step 9: Provide a Brief Description of the Challenges You Experienced

Provide a **brief description** about the data collection challenges that you experienced due to the extreme and uncontrollable event and how your 2022 performance data will be impacted.

Eve	nt Description * 🕜
	Enter a brief description of the event
	6000 characters remaining

**Note:** You don't need to submit supporting documentation with your application.

However, you should retain documentation of the circumstances supporting your application for your own records in the event that you are selected by CMS for data validation or an audit.

See our <u>2022 MIPS Data Validation Criteria Guide (ZIP)</u> for information on the data validation and audit process.

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### **Step 10: Select MIPS Performance Categories**

Select each **MIPS performance category** for which you are requesting reweighting by checking the corresponding box next to the category name, then select **Submit for Review**.

Performance Categories Affected \* 🕐

#### 🗸 Quality

Select this category when the event or circumstance has affected your performance or ability to collect quality data for a significant portion of the 12 month performance period. If this category is approved for reweighting, you won't receive a score in this category unless data are submitted for it.

#### Promoting Interoperability

Select this category when the event or circumstance has affected your performance or ability to collect promoting interoperability data for any 90 consecutive day period during the calendar year. If this category is approved for reweighting, you won't receive a score in this category unless data are submitted for it.

#### Improvement Activities

Select this category when the event or circumstance has affected your ability to implement any improvement activity for any 90 consecutive day period during the calendar year. If this category is approved for reweighting, you won't receive a score in this category unless data are submitted for it.

#### Cost

Select this category when you believe the event or circumstance has affected your performance on cost measures. If this category is approved for reweighting, you won't receive a score in this category even if data are submitted for other performance categories.

WITHDRAW

SUBMIT FOR REVIEW

**Note:** All performance categories will be automatically selected for APM Entity applications.

### **Step 11: Submit Extreme and Uncontrollable Circumstances Application**

Once you are done with your application, review the disclosures, then select the Submit for Review button.



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### **Extreme and Uncontrollable Circumstances Exception Application Submission Confirmation**

After you submit your application, you will receive a message stating that your application has been successfully submitted and is pending review. You will also receive an email notification.







### Where Can You Go for Help?

Contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8 a.m.-8 p.m. ET or by e-mail at: <u>QPP@cms.hhs.gov</u>.

 Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant. Visit the Quality Payment Program website for other <u>help and support</u> information, to learn more about <u>MIPS</u>, and to check out the resources available in the <u>QPP</u> <u>Resource Library</u>.

### **Additional Resources**

The <u>Quality Payment Program Resource Library</u> houses fact sheets, measure specifications, specialty guides, technical guides, user guides, helpful videos, and more. We will update this table as more resources become available.

 Resource

 2022 Automatic Extreme and Uncontrollable Circumstances Policy Fact Sheet (PDF)

 2022 MIPS Promoting Interoperability Hardship Exception Application Guide (PDF)

### **Version History**

If we need to update this document, changes will be identified here.

Date	Description
12/29/2022	Updated to include information about the EUC exception application extension which provides individuals, groups, virtual groups, and APM Entities with the opportunity to request performance category reweighting due to the COVID-19 PHE. Application deadline is 8 p.m. ET on March 3, 2023.
10/06/2022	Updated deadline to request an exception to January 3, 2023, at 8 p.m. ET (slides 6 and 18)
05/02/2022	Original Posting.



Appendices



## **Appendices**

### **Appendix A1: 2022 Performance Year MIPS Performance Category Weight Redistribution Policies for Individual Clinicians, Groups, Virtual Groups, and APM Entities Reporting Traditional MIPS**

The table below illustrates the 2022 performance category weights and reweighting policies that CMS will apply to clinicians, groups, and virtual groups reporting traditional MIPS. (Small practices should refer to <u>Appendix A2</u>.)

Refer to <u>Appendix B</u> for reweighting policies for APM Entities reporting the APP. APM Entities reporting traditional MIPS can **only** request reweighting for **all** performance categories.

If fewer than 2 performance categories can be scored (meaning 1 performance category is weighted at 100%, or all performance categories are weighted at 0%), the clinician, group, or virtual group will receive a final score equal to the performance threshold and the MIPS eligible clinicians will receive a neutral payment adjustment in the 2024 payment year.

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight	
No Reweighting					
Standard Weighting under traditional MIPS	30%	30%	15%	25%	
Reweight 1 Performance Category	Reweight 1 Performance Category				
<b>No Cost</b> (Cost $\rightarrow$ Quality and Promoting Interoperability)	55%	0%	15%	30%	
<b>No Improvement Activities</b> (Improvement Activities $\rightarrow$ Quality)	45%	30%	0%	25%	
No Promoting Interoperability (Promoting Interoperability → Quality)	55%	30%	15%	0%	
No Quality (Quality → Promoting Interoperability)	0%	30%	15%	55%	

### Appendix A1: 2022 Performance Year MIPS Performance Category Weight Redistribution Policies for Individual Clinicians, Groups, Virtual Groups, and APM Entities Reporting Traditional MIPS (continued)

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
Reweight 2 Performance Categories				
No Cost + No Promoting Interoperability (Cost + Promoting Interoperability → Quality)	85%	0%	15%	0%
No Cost + No Quality (Cost + Quality → Promoting Interoperability)	0%	0%	15%	85%
No Cost + No Improvement Activities (Cost + Improvement Activities → Promoting Interoperability + Quality)	70%	0%	0%	30%
No Promoting Interoperability + No Quality (Promoting Interoperability + Quality → Cost + Improvement Activities)	0%	50%	50%	0%
No Promoting Interoperability + No Improvement Activities (Promoting Interoperability + Improvement Activities → Quality)	70%	30%	0%	0%
No Quality + No Improvement Activities (Quality + Improvement Activities → Promoting Interoperability)	0%	30%	0%	70%

#### **Reweight 3 Performance Categories**

If you have multiple performance categories reweighted to 0% so that a single performance category is weighted at 100% of your final score, you will receive a score equal to the performance threshold regardless of any data submitted or not and receive a neutral payment adjustment.

#### **Reweight 4 Performance Categories**

If all performance categories are reweighted to 0%, you will receive a score equal to the performance threshold regardless of any data submitted or not and receive a neutral payment adjustment.

# **Appendix A2. MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2022 Performance Year: Small Practices**

The table below illustrates the 2022 performance category weights and reweighting policies that CMS will apply to small practices.

Refer to <u>Appendix B</u> for reweighting policies that apply to APM Entities reporting the APP. APM Entities reporting traditional MIPS can **only** request reweighting for **all** performance categories.

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight			
No Reweighting							
Standard Weighting under traditional MIPS for small practices	30%	30%	15%	25%			
	<b>Reweight 1 Perform</b>	nance Category					
No Cost (Cost → Quality and Promoting Interoperability)	55%	0%	15%	30%			
No Improvement Activities (Improvement Activities → Quality)	45%	30%	0%	25%			
No Promoting Interoperability (Promoting Interoperability → Quality and Improvement Activities)	40%	30%	30%	0%			
<b>No Quality</b> (Quality $\rightarrow$ Promoting Interoperability)	0%	30%	15%	55%			

\*Table continues on next slide.

# Appendix A2. MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2022 Performance Year: Small Practices (continued)

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight		
Reweight 2 Performance Categories						
No Cost + No Promoting Interoperability (Cost + Promoting Interoperability → Quality and Improvement Activities)	50%	0%	50%	0%		
No Cost + No Quality (Cost + Quality → Promoting Interoperability)	0%	0%	15%	85%		
No Cost + No Improvement Activities (Cost + Improvement Activities → Promoting Interoperability + Quality)	70%	0%	0%	30%		
No Promoting Interoperability + No Quality (Promoting Interoperability + Quality → Cost + Improvement Activities)	0%	50%	50%	0%		
No Promoting Interoperability + No Improvement Activities (Promoting Interoperability + Improvement Activities → Quality)	70%	30%	0%	0%		
No Quality + No Improvement Activities (Quality + Improvement Activities → Promoting Interoperability)	0%	30%	0%	70%		

**Note:** If you have multiple performance categories reweighted to 0% so that a single performance category is weighted at 100% of your final score, you will receive a score equal to the performance threshold regardless of any data submitted or not submitted. See next slide for additional information.

### **Appendix B. 2022 Performance Year MIPS Performance Category Weight Redistribution Policies for APM Entities and APM Participants Reporting the APP**

The table below illustrates the 2022 performance category weights and reweighting policies that CMS will apply to APM Entities reporting traditional MIPS and to individual clinicians, groups and APM Entities reporting via the APP.

#### **Reminders:**

**Reminder:** APM Entities can only submit an EUC Application for **all** performance categories.

- Cost isn't scored under the APP.
- There are no reporting requirements for the improvement activities performance category under the APP for performance year 2022. Participants reporting via the APP will automatically receive full credit for the improvement activities performance category.
- Participants reporting via the APP will follow the same reporting requirements as traditional MIPS for the Promoting Interoperability performance category.

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight	
No Reweighting					
Standard Weighting under the APP	50%	0%	20%	30%	
Reweight 1 Performance Category					
No Promoting Interoperability (Promoting Interoperability → Quality)	75%	0%	25%	0%	
No Quality (Quality → Promoting Interoperability)	0%	0%	25%	75%	

#### **Reweight 2+ Performance Categories**

If you have multiple performance categories reweighted to 0% so that a single performance category is weighted at 100% of your final score, you will receive a score equal to the performance threshold regardless of any data submitted or not and receive a neutral payment adjustment.

# **Appendix C. MIPS Promoting Interoperability Hardship Exception Application Status Descriptions**

The table below provides a description of each application status in the order of which they occur.

Draft in Progress	Submitted – Pending Approval	Approved / Denied	Withdrawn
Draft in Progress	Submitted - Pending Approval	Approved	🖉 Withdrawn
You are currently working on	You have successfully completed and submitted your application. Applications are reviewed in the order of which they are received.	We completed our review of your application and approved your request.	You have withdrawn your application. You can withdraw
your application and haven't submitted it yet. Select Manage to continue		🔀 Denied	your application at any point in the process. An application can't be
working on your application.		We completed our review of your application and denied your request.	reopened after being withdrawn. You'll need to complete a new application.