



# QPP Resource Center: MACRA Minute

April 2020



## New: Changes to 2019 Reporting Due to COVID-19

### *2019 Data Submission Deadline Extended to April 30, 2020*

The 2019 MIPS data submission deadline will be extended by 30 days to **April 30, 2020**. ECs that have already submitted data or plan to submit data by April 30th will receive their payment adjustment for the 2019 performance year.

### *2019 Extreme and Uncontrollable Circumstances Update*

MIPS ECs who don't submit data by April 30th will **automatically receive a neutral payment adjustment for 2021** under the extreme and uncontrollable circumstances policy. No additional action is required to qualify for this updated CMS policy.

Under the policy, the four MIPS performance categories will be weighted at zero percent; resulting in a score equal to the performance threshold and a neutral payment adjustment for 2021. ECs that submit data for two or more performance categories, however, will still be scored and receive their 2021 payment adjustment based on that score.

### *Re-Opening the 2019 Extreme & Uncontrollable Circumstances Application*

Clinicians that do not qualify for the automatic extreme &and uncontrollable circumstances policy can apply to have all four MIPS performance

categories re-weighted to zero percent.

The application is available to:

- Individual clinicians who were unable to complete their data submission for 2019;
- Small practices that were automatically scored as a group on Medicare Part B claims quality measures;
- Groups that started but were unable to complete their data submission; and
- Virtual groups that are unable to start or complete their data submission.

The application is accessible [here](#). When completing the application, please make sure to specify:

Your participation level (individual, group, virtual group);

1/1/2020 & 4/30/2020 as start- and end-dates;

Your inability to complete data submission due to COVID-19;\*

All four performance categories are considered for re-weighting

\*Applications submitted between April 3 and April 30th, citing COVID-19 & approved by CMS, will override any previous data submission.

#### Possible Scenarios for 2019 MIPS Data Submission:

1. **Submitted 2019 Data and Scored Unfavorably:** ECs that submitted 2019 data but scored unfavorably (less than the 30-point threshold to receive a neutral payment adjustment in 2021) can complete the Extreme and Uncontrollable Circumstances Application before **April 30, 2020** (at 7 p.m., CT). On the application, ECs will indicate their categories (can be up to all four) and reasons for their request(s).
2. **Submitted 2019 Data and Scored Favorably:** ECs that submitted 2019 data and were scored favorably don't need to take further action. These ECs will receive their payment adjustment in 2021.
3. **Did Not Submit 2019 Data:** ECs that didn't submit 2019 data and/or don't have time to do so also don't need to take further action. These ECs will be automatically included in the automatic extreme and uncontrollable circumstances group.

#### For More Information:

Please refer to the QPP COVID-19 response document for answers to frequently asked questions. Or, if you have questions about what to do in your specific situation, please contact HealthPOINT at 605-256-5555 or [qpp-surs@dsu.edu](mailto:qpp-surs@dsu.edu).

## Reminder: 2020 MIPS Reporting

While some clinicians are busier than normal fighting COVID-19, others might be seeing fewer patients. Those with additional availability are encouraged to use this time to prepare for 2020 MIPS reporting requirements. As of today, there have not been any changes to the 2020 reporting requirements or timeline. If you would like to meet with one of our advisors to go over requirements, please reach out to us at 1-844-358-4021.

The April LAN event has been postponed to May to allow clinicians to prioritize COVID-19 relief efforts. The May event will focus on understanding the new cost measures for 2020, learning how cost scores are calculated, & how to identify/adapt in areas that will have the greatest impact. Please register using the links below.

- [Tuesday, May 12th from 2:30 to 3:30 p.m., CT](#)
- [Thursday, May 14th from 10 to 11 a.m., CT](#)

### Now Available: 2020 Facility-Based Status

#### *What is Facility-Based Measurement?*

Facility-based measurement offers clinicians the opportunity to receive scores in the Quality and Cost performance categories based on the Hospital Value-Based Purchasing Program (VBP) score earned by their facility.

Individual MIPS ECs qualify for facility-based measurement in the 2020 performance year if they meet the following criteria:

- Billed at least 75 percent of their covered professional services in a place of service (POS) indicating a hospital setting (inpatient hospital (POS=21), on-campus outpatient hospital (POS=22), or emergency room (POS=23) between October 1, 2018 and September 30, 2019;
- Billed at least one service in an inpatient hospital or emergency room between October 1, 2018 and September 30, 2019; and
- Can be assigned to a facility with a FY 2021 Hospital VBP Program score.

Groups and virtual groups qualify for 2020 facility-based measurement when more than 75 percent of clinicians in the group qualify as individuals.

#### Check Your 2020 Facility-Based Status

The QPP [participation status tool](#) will identify clinicians as facility-based when they meet criteria 1 and 2 above, and are assigned to a facility with a FY 2020 Hospital VBP score (the most recent score available).

#### Can 2020 MIPS Facility-Based Status Change?

- The status of those not currently identified as facility-based will not change
- The status of those currently identified as facility-based could change if their assigned facility doesn't have a FY 2021 Hospital VBP score. We anticipate these scores will be available in January 2021.

While unusual, it's possible for a facility to have a Hospital VBP score in one year but not the next. This can occur if the facility does not meet one or more of the Hospital VBP exclusion/eligibility criteria for FY 2021. Examples of this criteria include:

- Hospital is subject to payment reductions under the Hospital Inpatient Quality Reporting (IQR) Program
- Hospital has an approved extraordinary circumstance exception specific to the Hospital VBP Program
- Hospital didn't meet the minimum number of cases, measures, or surveys under program requirements.
- Hospital was cited for deficiencies during the applicable fiscal year performance period(s) that pose an immediate jeopardy to patients' health or safety.
- Hospital that closes or have its CMS Certification Number terminated (e.g., a merger between two facilities or transition from an acute care to critical access hospital).

## New Resources: From Telligen & CMS

### *Telligen Resources*

Six new presentations are available on 2020 MIPS requirements:

- [2020 Quality Category Review](#)
- [2020 Improvement Activity Category Review](#)
- [2020 MIPS Promoting Interoperability Category Review](#)
- [2020 MIPS Cost Category Review](#)
- [Submitting 2020 Quality with Claims-Based Measures](#)
- [2020 MIPS Multi-Strata Measures](#)

### *QPP Resource Library*

- [2018 Performance Feedback FAQs](#)
- [QPP COVID-19 Response](#)
- [2020 Registration for the CMS Web Interface & CAHPS Survey](#)
- [2020 Cost Quick Start Guide](#)
- [2020 Qualified Registries](#)
- [2020 Qualified Clinical Data Registries \(QCDRs\)](#)
- [2020 QCDR Measure Specifications](#)
- [2020 Facility Based Quick Start Guide](#)

## Quality Measures Tip: Multimodal Pain Management

This month's in-depth look at new measures and activities for 2020 focuses on [Quality Measure 477: Multimodal Pain Management](#).

This opioid-related high-priority process measure was developed for Anesthesiologists to measure the percentage of patients, age 18 years and older, undergoing selected surgical procedures managed with multimodal pain medicine. Specifications for this measure are available [here](#).

*This material was prepared by Telligen QPP-SURS Resource Center, the Quality Payment Program for Iowa, Nebraska, North Dakota and South Dakota, under contract with the Centers*

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