

# **Taking Exception: Reviewing Options for MIPS Category Re-Weighting**

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October 27, 2021



# Quality Payment Program of Illinois

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# Agenda

- Quality Payment Program (QPP) Basics
- About QPP Exceptions
- Promoting Interoperability Exception
- Extreme and Uncontrollable Circumstances Exception
- Resources and Q&A

# QPP Basics

# QPP Participation Tracks



- MIPS is a Medicare “report card” assessing the value of care delivered
- Advanced APM (AAPM) are either Medical Home Models or require participants to bear a significant financial risk

# What if I'm in an AAPM?

- Will be evaluated for “Qualifying Participant” (QP) status:

Status	Payments through AAPM	Patients through AAPM
QP	50%	35%
Partial QP	40%	25%

- QPs are exempt from MIPS, receive automatic 5% bonus, and higher physician fee schedule update beginning 2026
- Partial QPs may elect to opt into MIPS or stay exempt
- Non-QPs in an AAPM may be subject to MIPS participation requirements

# I'm not in an AAPM, am I included in MIPS?

- Many believe MIPS does not apply because:
  - “I don't use electronic health records”
  - “I'm a solo/small practice”
  - “I work in nursing homes/home health”
  - “This isn't relevant to my subspecialty”
- Inclusion is based on annual Medicare volume thresholds:

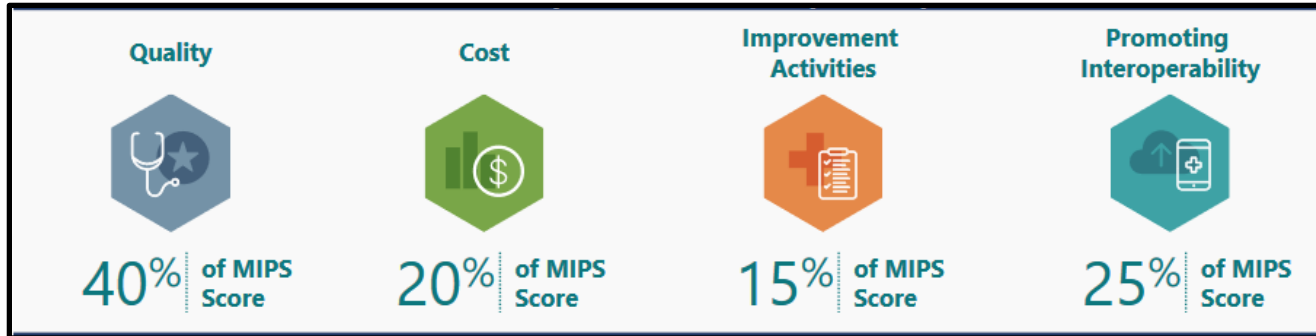
<b>Bill more than \$90k in charges</b>	<b>See more than 200 patients</b>	<b>Provide more than 200 services</b>
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Visit <https://qpp.cms.gov/participation-lookup> to review MIPS participation status by searching individual NPI



# How do I participate in \*traditional\* MIPS?

- Collect and report data on quality, cost, clinical improvements and EHR:



NOTE: These MIPS category weights are for program year 2021. They change over time and differ under MIPS APM

- Collect data through claims (Quality only), registry, or certified EHR
- Report data through same methods or the QPP website
- Reporting, scoring, and measures can vary by:
  - Special status
  - Specialty
  - MIPS APM participation

# How else could I participate in MIPS?

- APM Performance Pathway (APP)
  - Optional for clinicians participating in MIPS APM
  - Single, pre-determined measure set

**What Are the Reporting Requirements Under the APP?**

**Quality** —————→  
50% of MIPS Final Score

**Promoting Interoperability**  
30% of MIPS Final Score  
Same reporting as traditional MIPS

**Improvement Activities**  
20% of MIPS Final Score  
Automatic full credit in 2021

**Cost**  
0% of MIPS Final Score  
No requirements

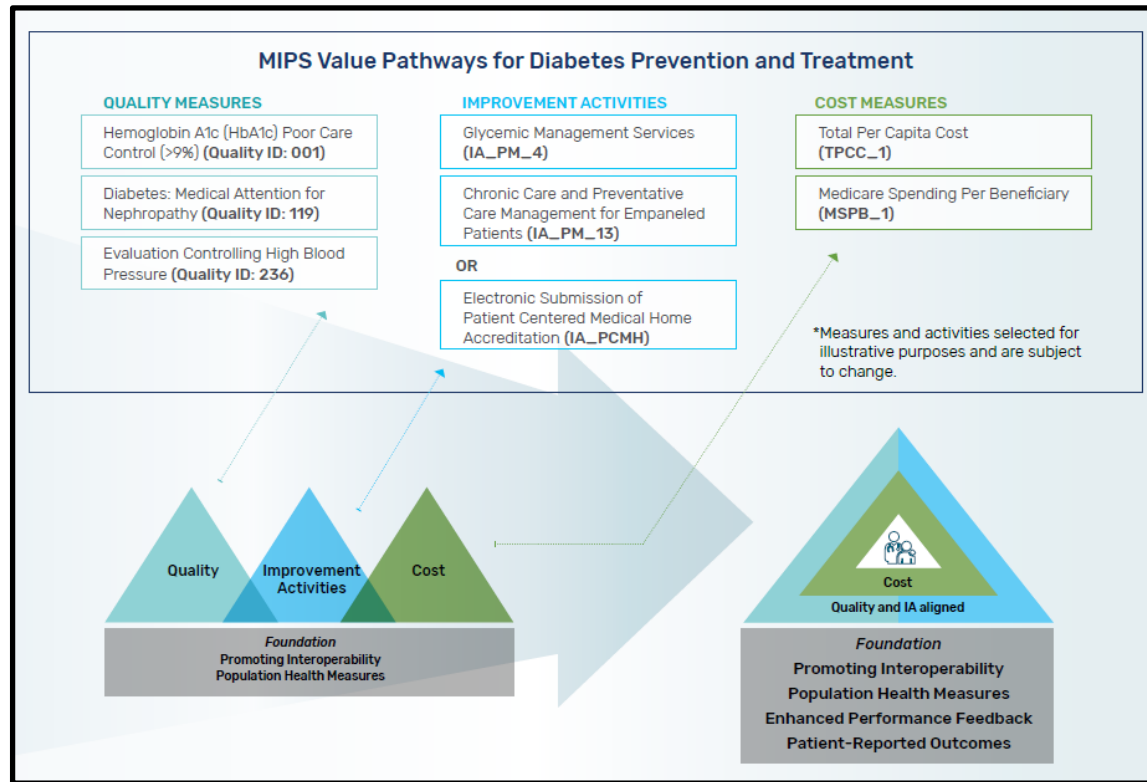
APP participants will be scored on the following quality measure set:

- CAHPS for MIPS (Quality ID: 321)
- Hospital-Wide, 30-day, All-Cause Unplanned Readmission (HWR) Rate for MIPS Eligible Clinician Groups (Quality ID: 479)
- Risk Standardized, All-Cause Unplanned Admissions for Multiple Chronic Conditions for ACOs (Quality ID: 480)
- Diabetes: Hemoglobin A1c (HbA1c) Poor Control (Quality ID: 001)\*
- Preventive Care and Screening: Screening for Depression and Follow-up Plan (Quality ID: 134)\*
- Controlling High Blood Pressure (Quality ID: 236)\*

\* Note: For the 2021 performance year only, Medicare Shared Savings Program ACOs have the option to report the 10 CMS Web Interface measures in place of these 3 measures (001, 134, 236) in the APP.

# How else could I participate in MIPS?

- MIPS Value Pathway (MVP)
  - Beginning 2022 or later
  - Specialty-aligned Quality/Cost measures and Improvement Activities



# What if I don't participate in MIPS?

- “Negative adjustment” on Medicare payments
- Applied two years later:

## 2019 Non-Participant

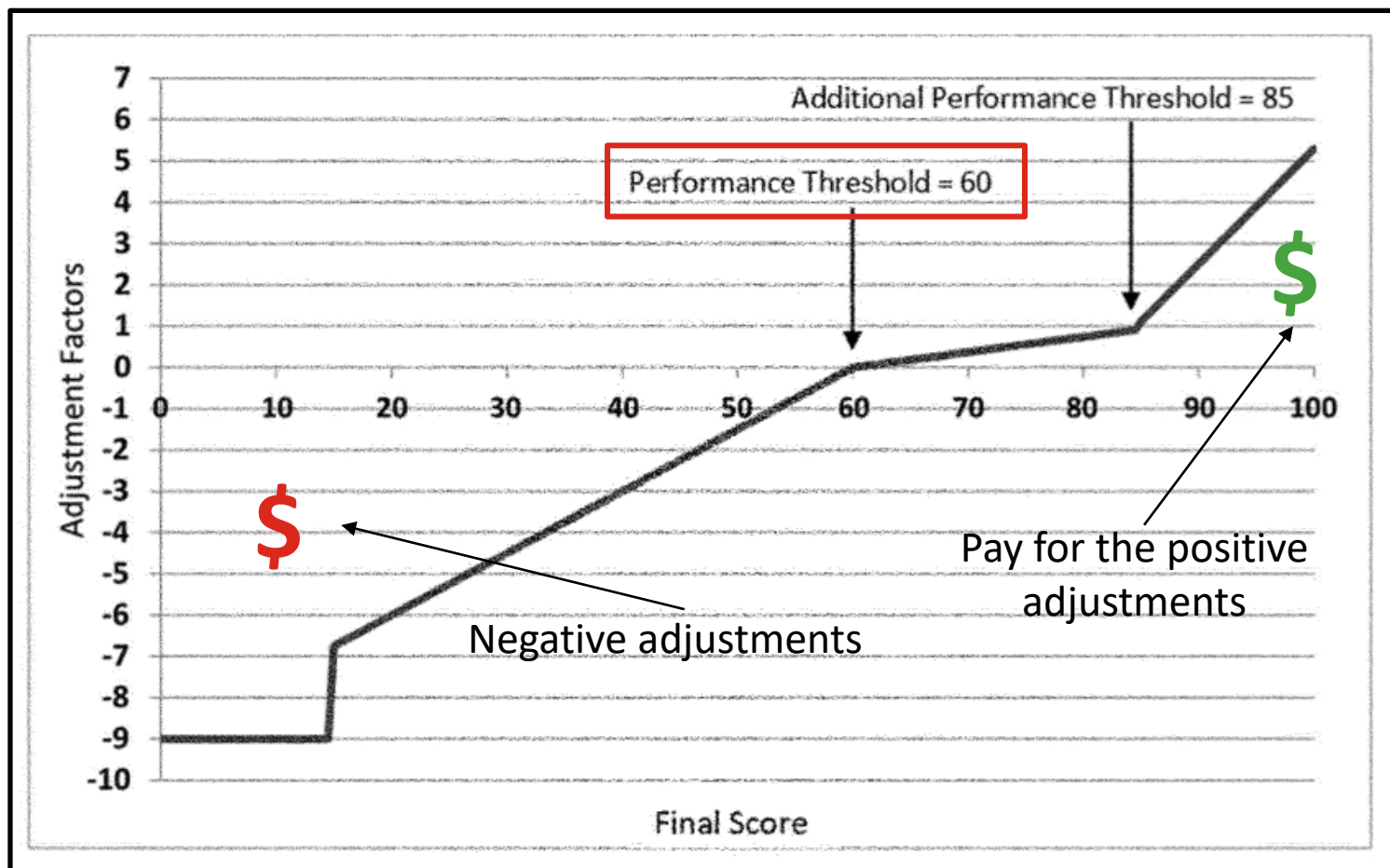
- Adjusted -9% in 2021
- -2% for sequestration
- -7% for MIPS

## 2021 Non-Participant

- Adjusted -11% in 2023
- -2% for sequestration
- -9% for MIPS (maximum)

- Adjustments reset each year

# Can I get a positive adjustment?



NOTE: this chart is an estimate for 2021 and will change over time

# About QPP Exceptions

# About QPP Exceptions

- Address circumstances that impact ability to meet requirements
- Allow exceptions from one or more MIPS categories
- Categories are “re-weighted” to 0% of MIPS score
- Guidelines may change each performance year
- May be applied automatically, but usually require application for:
  - Extreme and Uncontrollable Circumstances Hardship (EUC)
  - MIPS Promoting Interoperability Performance Category Hardship

# Update on 2020 EUC Exceptions

- Original deadline was 3/31/21
- Re-opened until 11/29/21 via Targeted Review request
- Available to any clinician or group unable to collect or submit data for MIPS categories due to impacts of the COVID-19 PHE
- Categories for which data was submitted can not be re-weighted
- If 3+ categories are re-weighted, payment adjustment will be neutral
- Recommended for clinicians receiving a penalty based on group score from MIPS Quality data submitted via Medicare Part B claims





# Promoting Interoperability Hardship

# Promoting Interoperability Category

- Requires use of 2015 Edition certified EHR technology (CEHRT)
- Automatically re-weighted for certain clinicians:
  - Hospital-based
  - Ambulatory Surgical Center (ASC)-based
  - Non-patient Facing
- Re-weighted by application in other circumstances:
  - Small practices
  - De-certified EHR technology
  - Insufficient internet connectivity
  - Natural disaster, practice closure, severe financial distress, or vendor issues
  - Lack control over availability of CEHRT

# 2021 PI Hardship Application

- Available until 12/31/21 at 8pm EST
- Requires HARP account (refer to [QPP Access User Guide](#))
- Application steps:
  - Sign into QPP with HARP account
  - Click “Exception Applications” from menu
  - Click “Add New Exception”
  - Select “Promoting Interoperability Hardship”
  - Complete the form with required info and submit
- Applications are typically approved immediately without review
- Category points are distributed to other MIPS categories
- May still submit data to cancel application and re-weighting

# 2021 PI Re-Weighting

- When claiming exception from PI, points are re-weighted to Quality
- Applies to both traditional MIPS and APM Performance Pathway

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
<b>No Reweighting</b>				
Standard Weighting under traditional MIPS	40%	20%	15%	25%
<b>Reweight 1 Performance Category</b>				
No Promoting Interoperability (Promoting Interoperability → Quality)	65%	20%	15%	0%

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



# **Extreme & Uncontrollable Circumstances Hardship**

# About EUC Hardship

- Available to clinicians/groups
- EUC are rare events entirely outside of your control and the control of the facility in which you practice, including COVID-19 PHE
- These circumstances would:
  - Cause you to be unable to collect information necessary to submit for a MIPS performance category;
  - Cause you to be unable to submit information that would be used to score a MIPS performance category for an extended period of time (for example, if you were unable to collect data for the quality performance category for 3 months), and/or;
  - Impact your normal processes, affecting your performance on cost measures and other administrative claims measures
- Automatic for clinicians in regions such as FEMA-designated disaster

# 2021 EUC Hardship Application

- Available until 12/31/21 at 8pm EST
- Requires HARP account (refer to [QPP Access User Guide](#))
- Application steps:
  - [Sign into QPP](#) with HARP account
  - Click “Exception Applications” from menu
  - Click “Add New Exception”
  - Select “Extreme and Uncontrollable Circumstances Hardship”
  - Complete the form with required info and submit
- Select any or all MIPS categories for re-weighting to 0%
- Applications may go to review or may be approved immediately
- May still submit data to cancel application and re-weighting

# 2020 EUC Hardship

- Available until 11/29/21 at 8pm EST
- Requires HARP account (refer to [QPP Access User Guide](#))
- Application steps:
  - [Sign into QPP](#) with HARP account
  - Click “Targeted Review” from menu
  - Click “Add New Targeted Review”
  - Choose individual or group application type
  - Complete the form with required info and submit
- Select any or all MIPS categories and check the box for EUC
- Targeted reviews can have variable turnaround time



# EUC Re-Weighting: Traditional MIPS

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
<b>Reweight 2 Performance Categories</b>				
<b>No Cost + No Promoting Interoperability</b> (Cost + Promoting Interoperability → Quality)	85%	0%	15%	0%
<b>No Cost + No Quality</b> (Cost + Quality → Promoting Interoperability)	0%	0%	15%	85%
<b>No Cost + No Improvement Activities</b> (Cost + Improvement Activities → Promoting Interoperability + Quality)	70%	0%	0%	30%
<b>No Promoting Interoperability + No Quality</b> (Promoting Interoperability + Quality → Cost + Improvement Activities)	0%	50%	50%	0%
<b>No Promoting Interoperability + No Improvement Activities</b> (Promoting Interoperability + Improvement Activities → Quality)	80%	20%	0%	0%
<b>No Quality + No Improvement Activities</b> (Quality + Improvement Activities → Promoting Interoperability)	0%	20%	0%	80%
<b>Reweight 3 Performance Categories</b>				
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.				
<b>Reweight 4 Performance Categories</b>				
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.				

# EUC Re-Weighting: APP

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
<b>No Reweighting</b>				
<b>Standard Weighting under the APP</b>	50%	0%	20%	30%
<b>Reweight 1 Performance Category</b>				
<b>No Promoting Interoperability</b> (Promoting Interoperability → Quality)	75%	0%	25%	0%
<b>No Quality</b> (Quality → Promoting Interoperability)	0%	0%	25%	75%
<b>Reweight 2+ Performance Categories</b>				
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.				

# Exception Tips

# Check Your MIPS Score(s) First

- Exceptions only advised if negative adjustment exists/is likely
- Check 2020 scores/adjustments:
  - Sign into QPP with HARP account
  - Click “Performance Feedback” from menu
  - Click “View Practice Details”
  - Click “View Practice Feedback” or “View Individual Feedback”
  - Check for negative payment adjustment
- Estimate 2021 scores/adjustments:
  - Sign into the QPP Resource Center (or join now)
  - Click “MIPSCast” from menu
  - Enter data to create a score prediction (view webinar or slides)
  - If estimate is below 60, exception may be worth consideration

# Act Fast and Keep it Simple

- Leave time for troubleshooting in advance of deadlines:
  - 11/29/21 for 2020 Targeted Review
  - 12/31/21 for 2021 EUC Exception
- Only claim exceptions for group or individuals impacted
- State explicitly in the description that you're submitting an EUC application due to the continuing COVID-19 PHE
- Reiterate which categories you're requesting re-weighting
- Extra detail is good for audit protection but may delay review

# Resources and Q & A

# Resources

- [2021 MIPS EUC Hardship Application Guide](#)
- [CMS Update on 2020 Performance Feedback and EUC Request Extension](#)
- [2020 EUC Reweighting Requests Extension Guide](#)
- [CHITREC QPP Webinar Archive](#)

# Q&A





**THANK YOU!!**

**Quality Payment Program of Illinois**

<https://www.qppresourcecenter.org/>

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