

Performance Year (PY) 2020 Extreme and Uncontrollable Circumstances: Reweighting Requests Extension Guide

Purpose: This resource provides information about PY 2020 performance category reweighting requests, how data submission affects performance category reweighting requests, and provides step-by-step instructions with screenshots for using the targeted review form to submit your PY 2020 EUC reweighting request.

- [Background](#)
- [Data Submission and Performance Category Reweighting](#)
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Background

The COVID-19 pandemic continues to impact all clinicians across the United States and territories, and we recognize that not everyone may have been able to submit an Extreme and Uncontrollable Circumstances (EUC) Exception Application for performance year (PY) 2020 before the March 31, 2021 deadline. As part of our ongoing support for clinicians who are on the front lines of this public health emergency (PHE), we're allowing clinicians, groups, virtual groups, and Alternative Payment Model (APM) Entities to request Merit-based Incentive Payment System (MIPS) performance category reweighting for PY 2020 under our EUC policy now through November 29, 2021 at 8 p.m. ET.





While any clinician, group, virtual group or APM Entity can request performance category reweighting during this time period due to the COVID-19 PHE, the following types of groups in particular may want to consider submitting a request:

- **Small practices that reported Medicare Part B claims measures for the quality performance category but didn't report group-level data for other performance categories.** Some small practices may not have fully understood the implications of their PY 2020 claims reporting in the context of some of the PY 2019 policies we introduced at the onset of the COVID-19 PHE. As a result, these small practices may wish to request performance category reweighting on behalf of the entire group.
- **Virtual groups that weren't able to submit an EUC application by the March 31st deadline or their PY 2020 data due to the ongoing COVID-19 PHE.** Clinicians that were approved to participate as a virtual group will be scored as a virtual group, regardless of data submission. Some virtual groups with clinicians on the front lines of the COVID-19 PHE may have missed the March 31st deadline for submitting an EUC Exception Application or were unaware that the automatic EUC policy didn't apply to their MIPS eligible clinicians.

Due to technical limitations, we're unable to reopen the 2020 EUC Exception Application form in our systems. Because of these technical limitations, **we're allowing stakeholders to submit 2020 EUC reweighting requests through the Targeted Review form until 11/29/2021.**

- **IMPORTANT:** Don't submit your requests through the EUC Exception Application.
- The EUC Exception Application form currently accessible on qpp.cms.gov is for PY 2021 only.

Note: We applied our automatic EUC policy to all clinicians who were eligible to participate in MIPS as individuals, which means we only scored performance categories for which we received data for the individual clinician. Any performance category for which data **wasn't** submitted for the individual clinician was automatically reweighted to 0% of the individual's final score.

- **There's no need to request reweighting for PY 2020 for a clinician who was eligible to participate in MIPS as an individual.** We've already applied reweighting to these clinicians under the automatic EUC policy.
- **There's no reason to request performance category reweighting if you submitted data.** We won't reweight any performance category for which an individual, group or virtual group submitted data. We're reopening the reweighting application to offer support for those on the front lines of this public health emergency (PHE) and as a result may not have been able to submit an extreme and uncontrollable circumstances application or submit data by the March 31st deadline.

Data Submission and Performance Category Reweighting

Groups and Virtual Groups

In accordance with our EUC policies for individuals, groups and virtual groups, we won't reweight any performance category for which we've received data. Please note that when fewer than 2 performance categories are scored (meaning 1 category is weighted at 100% of the final score, and the others are weighted at 0%), the clinician or group will earn a PY 2020 final score equal to the performance threshold and the MIPS eligible clinician(s) will receive a neutral payment adjustment in payment year 2022, unless a higher final score is available.

Let's look at an example:

Small practices that submitted Medicare Part B claims measures automatically receive a quality score for the group, in addition to quality scores for individual clinicians. The quality performance category can't be reweighted for the group because we received data. However, they can request reweighting for the group, if applicable, due to the COVID-19 PHE for the improvement activities and Promoting Interoperability performance categories. (For simplicity, you can request reweighting in all performance categories, but quality won't be reweighted because of the claims data.)

- If the request is approved, the improvement activities and Promoting Interoperability performance categories would be reweighted to 0% provided no group-level data was submitted for these performance categories.
- As a reminder, we've reweighted the cost performance category to 0% for all clinicians and groups in PY 2020.

- Because the quality category is now 100% of their final score, the group would receive a final score equal to the performance threshold.
- The clinicians who were only eligible to participate in MIPS as a group would receive a neutral payment adjustment in the 2022 payment year.
- The clinicians who were individually eligible would also receive a neutral payment adjustment unless they had a higher score from individual or APM Entity participation.

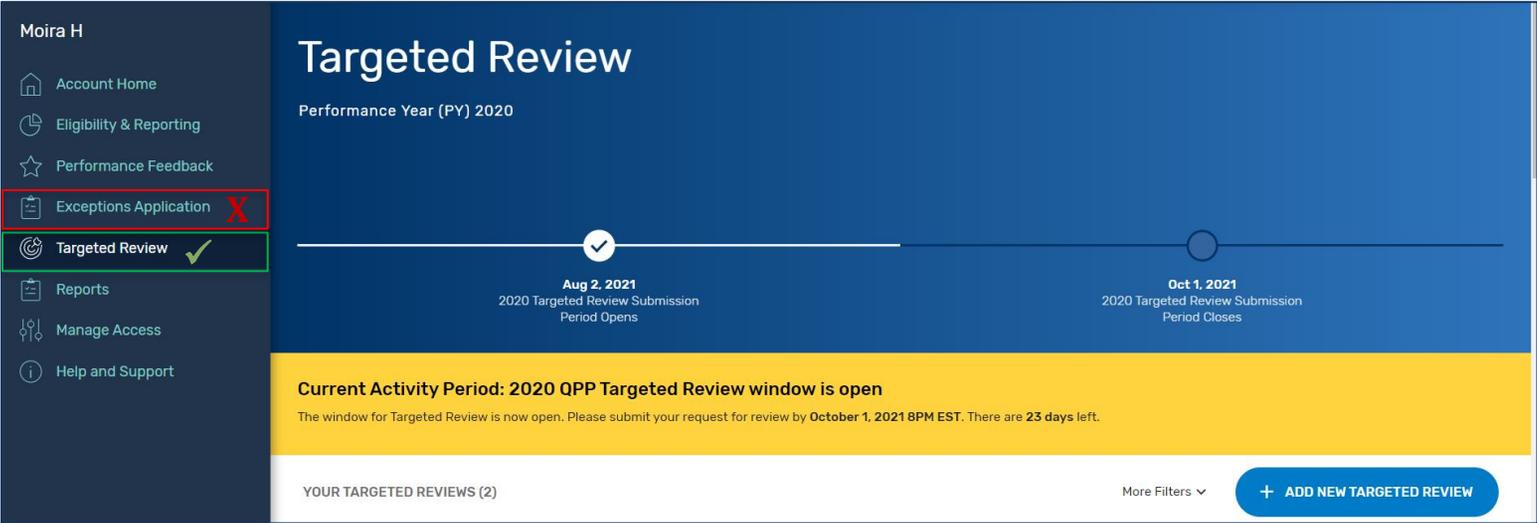
APM Entities

In accordance with our EUC policies for APM Entities, data submission for an APM Entity won't override performance category reweighting. Furthermore, APM Entities must include all performance categories in their reweighting request. If performance category reweighting is requested and approved, the MIPS eligible clinicians in the APM Entity will receive a score equal to the performance threshold and a neutral MIPS payment adjustment in the 2022 payment year.

Submitting New 2020 Reweighting Requests (Instructions and Screenshots)

Step 1. Sign in to gpp.cms.gov

Step 2. Click Targeted Review on the left-hand navigation and “Add New Targeted Review”



The EUC Exception Application form currently accessible on gpp.cms.gov is for PY 2021 only. **DON'T select Exceptions Application** from the left-hand navigation if you're requesting reweighting for PY 2020.

Step 3. Select your Application Type.

Add New Targeted Review

Application Type * ?

Individual Virtual Group

Group

APM Entity

Group TIN * ?

123456789

CANCEL SAVE SAVE & CONTINUE >

Your application type is the level at which performance category reweighting requests will be approved or denied.

For example, **small practices who were automatically scored as a group on Medicare Part B claims measures would select “Group”** to ensure that reweighting was applied to the **group’s final score**, which would include clinicians that weren’t individually eligible.

Step 4. Complete required contact information.

Additional Access

Additional Staff Access Email(s) ?

Enter email address(es)

Hit enter/comma after each entry to add multiple

This field lets you provide additional email addresses for other staff members. These people will receive emails about the status of this request, including approval or denial notifications.

Step 5. Select performance categories for reweighting.

Performance Categories

Select which Performance Categories were affected by your issue.

[View Current Performance Feedback Scores](#) 

Performance Categories *

- Quality 
- Improvement Activities 
- Promoting Interoperability 
- Additional Awarded Bonus Points 

Groups and virtual groups

For simplicity, you can select all performance categories.

If your request is approved, we won't reweight any performance category for which data is submitted.

APM Entities

You can only request reweighting for all performance categories.

If your request is approved, we'll reweight all performance categories to 0% regardless of data submission.

Step 6. Select “Extreme and uncontrollable circumstances” as your issue.

Issue Selection

Select the most applicable criteria that describes the issue you, or those you are requesting on behalf of, experienced. Complete the additional fields that populate after your selection. When applicable, please attach any supporting documentation that may support your claim.

Issue Selection *

- Submission ?
- Eligibility and/or special status determination(s) ?
- Extreme and uncontrollable circumstances ?
- Measure/activity issues ?
- General/additional issues ?

Select “Extreme and uncontrollable circumstances”

Step 7. Enter your zip code and provide dates of the circumstance.

Where did the extreme and uncontrollable circumstance(s) happen? *

Zip Code Baltimore, MD (United States)

When did the extreme and uncontrollable circumstance(s) take place? *

Start Date To

Still persists

Because you're completing this application due to impacts stemming from COVID-19, you can select a start date in March 2020 and then check the "still persists" box for the end date.

Step 8. Provide the details of your extreme and uncontrollable circumstances performance category reweighting request.

Please provide the specific details outlining the circumstance(s) of this Targeted Review or 2020 EUC Exception Application request. *

Due to technical limitations, we're unable to reopen the 2020 Extreme and Uncontrollable Circumstances (EUC) Exception Application form in our systems. Because of these technical limitations, we're allowing stakeholders to submit their 2020 EUC Exception Application through this targeted review form. If you're using this form to submit an EUC Exception Application for performance year (PY) 2020 due to the continuing COVID-19 public health emergency, please state that explicitly in this section and make sure you have selected "Extreme and uncontrollable circumstances" in your Issue Selection (above). In addition, we encourage you to reiterate the performance categories for which you are requesting reweighting: quality, improvement activities, and/or Promoting Interoperability.

In accordance with our EUC policies, we won't reweight any performance category for individuals, groups or virtual groups for which we've received data. Please note that when fewer than two performance categories are scored (meaning one category is weighted at 100% of the final score, and the others are weighted at 0%), the clinician or group will earn a PY 2020 final score equal to the performance threshold and the MIPS eligible clinician(s) will receive a neutral payment adjustment in payment year 2022, unless a higher final score is available.

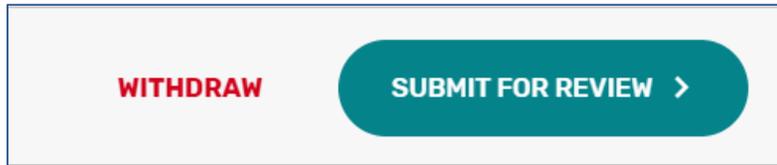
Data submission for an APM Entity won't override performance category reweighting.

We're using this form to submit a 2020 extreme and uncontrollable circumstances exception application on behalf of our group for performance category reweighting due to issues stemming from the ongoing COVID-19 public health emergency. We're requesting reweighting of all performance categories.

You need to specify that you're submitting an extreme and uncontrollable circumstances request due to COVID-19.

We also encourage you to reiterate the performance categories for which you're requesting reweighting.

Step 9. Scroll to the bottom of the page and click “Submit for Review”.



Where Can I Learn More?

- [2020 Scoring Updates and 2020 Performance Category Reweighting Requests Extension Listserv Message](#)

Contact the Quality Payment Program Service Center at 1-866-288-8292 or by e-mail at: QPP@cms.hhs.gov (Monday-Friday 8 a.m.- 8 p.m. ET). To receive assistance more quickly, please consider calling during non-peak hours—before 10 a.m. and after 2 p.m. ET. Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.

Version History

Date	Change Description
9/27/2021	Original Posting