The 2021 Merit-based Incentive Payment System (MIPS) Automatic Extreme and Uncontrollable Circumstances Policy

We established an automatic extreme and uncontrollable circumstances (EUC) policy beginning with the 2017 performance year for clinicians affected by natural disasters. Clinicians affected by these extreme and uncontrollable circumstances may have their performance categories reweighted or receive a neutral payment adjustment. This resource addresses the automatic EUC policy as it applies to individual MIPS eligible clinicians for the 2021 performance year.

The automatic EUC policy (and this fact sheet) only applies to MIPS eligible clinicians participating as individuals.

The automatic EUC policy doesn't apply to group, virtual group, or APM Entity participation. The 2021 EUC application will be available for individuals, groups, virtual groups, and APM Entities in summer 2021.

Who Does the Automatic EUC Policy Apply To?

We are currently extending the automatic EUC policy to MIPS eligible clinicians identified as located in a CMS-designated region affected by an extreme and uncontrollable event (such as a Federal Emergency Management Agency (FEMA)-designated major disaster) during the 2021 performance year. For those clinicians, we aim to reduce your reporting burden by not requiring you to submit an application to reweight the performance categories under MIPS.

We will update this resource as additional events are identified that trigger this policy.

The automatic EUC policy doesn't apply to group, virtual group, or APM Entity participation.

- Groups that submit data will be scored according to existing MIPS scoring policies. The MIPS eligible clinicians in the group will receive the group's Final Score and associated payment adjustment unless they have a higher score from individual participation.

- Virtual groups (regardless of data submission) will be scored according to existing MIPS scoring policies. The MIPS eligible clinicians in the virtual group will receive the virtual group's Final Score and associated payment adjustment.

- APM Entities that submit MIPS data will be scored according to existing MIPS scoring policies. The MIPS eligible clinician in the APM Entity will receive the Entity's Final Score

and associated payment adjustment unless they have a higher score from individual or group participation.

How Does the Automatic EUC Policy Work?

We identify MIPS eligible clinicians who are located in CMS-designated areas that have been affected by an extreme and uncontrollable circumstance based on the address associated with the clinician in the Provider Enrollment, Chain, and Ownership System (PECOS), which is the practice address, displayed on the [Quality Payment Program (QPP) Participation Status Tool](#). MIPS eligible clinicians who are automatically identified and subject to MIPS will have all 4 performance categories weighted at zero percent.

> We make every effort to accurately identify all clinicians who are eligible for this policy. **Clinicians should ensure that the practice address listed in PECOS is up to date and check their performance feedback on [qpp.cms.gov](#) to ensure the policy was correctly applied, as applicable.**

Individual clinicians will automatically receive a score equal to the performance threshold, which will result in a neutral payment adjustment (neither a positive nor a negative adjustment) for the 2023 MIPS payment year **unless**:

- The clinician submits data as an individual for 2 or more MIPS performance categories (quality, improvement activities, and/or Promoting Interoperability);
  - o Data submission by individual clinicians voids the 0% performance category weight on a category-by-category basis.
- The clinician is part of a group or APM Entity that submits data on behalf of its clinicians; or
- The clinician is part of a virtual group.

> Under the automatic EUC policy, **the cost performance category will always be weighted at 0%**, even if you submit data as an individual for the other performance categories.
>
> As a reminder, the automatic EUC policy doesn't apply to group, virtual group, or APM Entity participation.

For a more detailed explanation of how your performance categories will be reweighted under the automatic policy based on data submission, please see Appendix A.

Frequently Asked Questions

How do I know if I'm in an area designated by CMS as being affected by an extreme and uncontrollable circumstance?

We communicate information about events that trigger the automatic EUC policy through the QPP listserv updates. You can subscribe to the QPP listserv on the QPP website. In addition, we will update this fact sheet to identify any new events or changes to previously identified events.

We're applying this policy to clinicians in the following designated area listed on the FEMA website under sections Public Assistance PA-A and PA-B:

- Affected counties for the Texas Severe Winter Storm
  - Texas: DR-4586-TX

Additionally, once we identify new events, you can find information about designated disaster areas on the FEMA designated disaster areas page. Clinicians can monitor these pages for updates on designated disaster areas.

Appendix B identifies the counties identified as located in CMS-designated areas that have been affected by an extreme and uncontrollable circumstance.

What if I am part of a group, virtual group, or APM Entity where some, but not all, clinicians are located in areas designated by CMS as affected by an extreme and uncontrollable circumstance?

The automatic EUC policy will only apply to individual MIPS eligible clinicians located in the designated area. CMS will assign a weight of 0% in the MIPS Final Score, resulting in a neutral payment adjustment for the 2023 MIPS payment year to MIPS eligible clinicians located in the designated area(s), **unless** your group or APM Entity submits data on your behalf or you are part of a CMS-approved virtual group during the 2021 submission period (January 3, 2022 to March 31, 2022).

A group or APM Entity that chooses to submit data at the group or APM Entity level for the 2021 performance year will be scored as a group or APM Entity according to the existing and applicable 2021 MIPS scoring policies.

All CMS-approved virtual groups will be scored as a virtual group according to existing MIPS scoring policies, regardless if they submit data or not.

Groups and virtual groups can complete an EUC application if the extreme and uncontrollable circumstance impacts their ability to collect data, at a group or virtual group level, for a specific MIPS performance category. APM Entities also may submit an application but are required to request reweighting for all performance categories.

What should I do if I am eligible for the automatic EUC policy, but my performance feedback does not reflect the correct reweighting?

If you believe that you qualified for the automatic EUC policy, but you do not see it reflected in your performance feedback, you should submit a targeted review. Targeted reviews can be requested for 60 days following the release of the 2023 payment adjustment in your 2021 performance feedback.

What happens if I am a MIPS eligible clinician covered by the automatic EUC policy but still submit data?

It depends on how many performance categories you submit data for **as an individual**.

- If you submit data for one performance category (or no data at all), you will receive a Final Score equal to the performance threshold and receive a neutral payment adjustment.

- If you submit data for 2 or 3 performance categories (quality, improvement activities, and/or Promoting Interoperability), you will be scored on the performance categories for which you submitted data. Your payment adjustment will be determined by your Final Score.

- You **won't** be scored in any performance category for which data isn't submitted.

- You **won't** be scored on the cost performance category under the automatic EUC policy even if data are submitted in other performance categories. (Reminder: the automatic EUC policy **doesn't** apply to group, virtual group, or APM Entity participation.)

What happens if I've submitted Medicare Part B claims prior to a triggering event for the automatic EUC policy?

If a MIPS eligible clinician in a small practice reports via Medicare Part B claims collection type for the quality performance category, and we receive data for the clinician prior to a triggering event for the automatic EUC policy, their Medicare Part B claims data would only contribute to their individual Final Score if they also submit data for either the Promoting Interoperability or the improvement activities performance categories as individuals.

Please note that when clinicians report Medicare Part B Claims measures, we automatically calculate a score for the quality performance category at the individual and group level.

Where Can I Learn More?
- [Quality Payment Program website](#)
- [CY 2021 Physician Fee Schedule (PFS) Final Rule](#)
- [Federal Emergency Management Agency (FEMA) Designated Disaster Areas webpage](#)
- [CMS's Emergency Preparedness and Response webpage](#)

To receive QPP information and updates, you can subscribe to the [QPP listserv](#). You can also contact the QPP at 1-866-288-8292, Monday through Friday, 8 a.m. – 8 p.m. Eastern Time or by email at: QPP@cms.hhs.gov. Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.

Version History Table

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

Date	Change Description
05/05/2021	Original posting

Appendix A

The table below illustrates the 2021 MIPS performance category reweighting policies that CMS will apply under the MIPS automatic EUC policy to clinicians that submit MIPS data as individuals.[1]

Data Submitted	Quality Category Weight	Promoting Interoperability Category Weight	Improvement Activities Category Weight	Cost Category Weight	Payment Adjustment
No data	0%	0%	0%	0%	Neutral
Submit Data for One Performance Category					
Quality Only	100%	0%	0%	0%	Neutral
Promoting Interoperability Only	0%	100%	0%	0%	Neutral
Improvement Activities Only	0%	0%	100%	0%	Neutral
Submit Data for 2 Performance Categories					
Quality **and** Promoting Interoperability	70%	30%	0%	0%	Positive, Negative, or Neutral
Quality **and** Improvement Activities	85%	0%	15%	0%	Positive, Negative, or Neutral
Improvement Activities **and** Promoting Interoperability	0%	85%	15%	0%	Positive, Negative, or Neutral
Submit Data for 3 Performance Categories					
Quality **and** Improvement Activities **and** Promoting Interoperability	55%	30%	15%	0%	Positive, Negative, or Neutral

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[1] See §414.1380.

Appendix B

The table below lists the affected counties located in a CMS-designated region affected by an extreme and uncontrollable event during the 2021 MIPS performance year. (This information is current as of the most recent date in the version history table and may not reflect changes that have already been identified on the FEMA pages linked above.)

Texas Severe Winter Storm – Texas Counties – DR-4586-TX		
• Anderson	• Gillespie	• Moore
• Andrews	• Glasscock	• Morris
• Angelina	• Goliad	• Motley
• Aransas	• Gonzales	• Nacogdoches
• Archer	• Gray	• Navarro
• Armstrong	• Grayson	• Newton
• Atascosa	• Gregg	• Nolan
• Austin	• Grimes	• Nueces
• Bailey	• Guadalupe	• Ochiltree
• Bandera	• Hale	• Oldham
• Bastrop	• Hall	• Orange
• Baylor	• Hamilton	• Palo Pinto
• Bee	• Hansford	• Panola
• Bell	• Hardeman	• Parker
• Bexar	• Hardin	• Parmer
• Blanco	• Harris	• Pecos
• Borden	• Harrison	• Polk
• Bosque	• Hartley	• Potter
• Bowie	• Haskell	• Presidio
• Brazoria	• Hays	• Rains
• Brazos	• Hemphill	• Randall
• Brewster	• Henderson	• Reagan
• Briscoe	• Hidalgo	• Real
• Brooks	• Hill	• Red River
• Brown	• Hockley	• Reeves
• Burleson	• Hood	• Refugio

Texas Severe Winter Storm – Texas Counties – DR-4586-TX

• Burnet	• Hopkins	• Roberts
• Caldwell	• Houston	• Robertson
• Calhoun	• Howard	• Rockwall
• Callahan	• Hudspeth	• Runnels
• Cameron	• Hunt	• Rusk
• Camp	• Hutchinson	• Sabine
• Carson	• Irion	• San Augustine
• Cass	• Jack	• San Jacinto
• Castro	• Jackson	• San Patricio
• Chambers	• Jasper	• San Saba
• Cherokee	• Jeff Davis	• Schleicher
• Childress	• Jefferson	• Scurry
• Clay	• Jim Hogg	• Shackelford
• Cochran	• Jim Wells	• Shelby
• Coke	• Johnson	• Sherman
• Coleman	• Jones	• Smith
• Collin	• Karnes	• Somervell
• Collingsworth	• Kaufman	• Starr
• Colorado	• Kendall	• Stephens
• Comal	• Kenedy	• Sterling
• Comanche	• Kent	• Stonewall
• Concho	• Kerr	• Sutton
• Cooke	• Kimble	• Swisher
• Coryell	• King	• Tarrant
• Cottle	• Kinney	• Taylor
• Crane	• Kleberg	• Terrell
• Crockett	• Knox	• Terry
• Crosby	• La Salle	• Throckmorton
• Culberson	• Lamar	• Titus
• Dallam	• Lamb	• Tom Green
• Dallas	• Lampasas	• Travis

Texas Severe Winter Storm – Texas Counties – DR-4586-TX		
• Dawson	• Lavaca	• Trinity
• DeWitt	• Lee	• Tyler
• Deaf Smith	• Leon	• Upshur
• Delta	• Liberty	• Upton
• Denton	• Limestone	• Uvalde
• Dickens	• Lipscomb	• Val Verde
• Dimmit	• Live Oak	• Van Zandt
• Donley	• Llano	• Victoria
• Duval	• Loving	• Walker
• Eastland	• Lubbock	• Waller
• Ector	• Lynn	• Ward
• Edwards	• Madison	• Washington
• El Paso	• Marion	• Webb
• Ellis	• Martin	• Wharton
• Erath	• Mason	• Wheeler
• Falls	• Matagorda	• Wichita
• Fannin	• Maverick	• Wilbarger
• Fayette	• McCulloch	• Willacy
• Fisher	• McLennan	• Williamson
• Floyd	• McMullen	• Wilson
• Foard	• Medina	• Winkler
• Fort Bend	• Menard	• Wise
• Franklin	• Midland	• Wood
• Freestone	• Milam	• Yoakum
• Frio	• Mills	• Young
• Gaines	• Mitchell	• Zapata
• Galveston	• Montague	• Zavala
• Garza	• Montgomery	