CMS: Every eligible physician in Georgia will receive at least a neutral MIPS adjustment for 2017 – even if they don’t report - Please note details on this exemption

In a presentation that he gave during a ‘MIPS QPP Summit’ in Atlanta on January 25, Richard Wild, M.D. – the chief medical officer for the Centers for Medicare & Medicaid Services Atlanta Region IV – reported that every MIPS-eligible clinician in Georgia will “automatically receive a neutral MIPS payment adjustment, unless you submit data for any of the MIPS performance categories by the submission deadline for 2017” because all 159 counties in the state were declared emergency areas during the hurricanes that took place in 2017.

Dr. Wild explained that “if you’re located in Federal Emergency Management Agency (FEMA) designated areas affected by Hurricanes Harvey, Irma, Maria or Nate or the California Wildfires, [CMS has] tried to lessen your burden by not requiring you to submit an application to reweight the performance categories...If you’re an affected MIPS eligible clinician, you’ll automatically receive a neutral MIPS payment adjustment, unless you submit data for any of the MIPS performance categories by the submission deadline for 2017, in which case you will be scored on each performance category for which you submit data, according to existing MIPS scoring policies.”

He added that, “This automatic extreme and uncontrollable circumstances policy only applies to you if you’re an individual MIPS eligible clinician in an affected area based on information in the Provider Enrollment, Chain and Ownership System (PECOS).”

Please note the group exception information below and details at CMS link. A physician can still report and receive a positive adjustment in MIPS.

Dr. Wild stressed that, “The Extreme and Uncontrollable Circumstances policy does not apply to MIPS eligible clinicians in MIPS Alternative Payment Models (MIPS APMs) in 2017. This is because under the APM scoring standard in the first year of MIPS, an APM entity would normally receive a score that is at least equal to or higher than the performance threshold...”

In terms of the MIPS transition year scoring, Dr. Wild said that, “[CMS] will assign a weight of 0% in the MIPS final score for each performance category where you don’t submit data by the applicable final deadline. If you don’t submit any data, you won’t have a negative MIPS payment adjustment for the 2019 MIPS payment year. If you have fewer than 2 performance category scores, you’ll receive a final score that’s equal to the
performance threshold and a neutral MIPS payment adjustment. If you’re eligible for reweighting due to extreme and uncontrollable circumstances but still choose to report on two or more performance categories (either as an individual or group), you’ll be scored on those performance categories and your MIPS payment adjustment will be based on your final score.”

CMS notes that the MIPS reporting deadline for the 2017 reporting year is March 31, 2018 – “unless [physicians] report using the web interface, in which case the reporting window ends on March 16, 2018.”

Go to www.qpp.cms.gov for more information on MIPS/QPP. Contact CMS at 866.288.8292 or QPP@cms.hhs.gov with questions.

**What do extreme and uncontrollable circumstances mean for the MIPS Transition Year scoring?**

Here’s how your scoring will be affected if you’ve faced extreme and uncontrollable circumstances:

We’ll assign a weight of 0% in the MIPS final score for each performance category where you don’t submit data by the applicable deadline.

If you don’t submit any data, you won’t have a negative MIPS payment adjustment for the 2019 MIPS payment year. If you have fewer than 2 performance category scores, you’ll receive a final score that’s equal to the performance threshold and a neutral MIPS payment adjustment.

If you’re eligible for reweighting due to extreme and uncontrollable circumstances but still choose to report on two or more performance categories (either as an individual or group), you’ll be scored on those performance categories and your MIPS payment adjustment will be based on your final score.

The performance category or categories won’t be reweighted to 0% in the final score, and you may be eligible for a positive MIPS payment adjustment based on your final score.
If you’re an individual MIPS eligible clinician who is part of a group, you can qualify for this policy.

Groups will only be scored as a group if they submit information to MIPS as a group. If a group is located in an affected area and doesn’t submit any data, the MIPS eligible clinicians in that group will be treated as individuals, get a MIPS final score equal to the performance threshold, and get a neutral MIPS payment adjustment. If a group in an affected area submits any data as a group, the new Extreme and Uncontrollable Circumstances policy doesn’t apply and the group will get a final score based on the generally applicable MIPS scoring policies.

Note

For physicians who are listed in PECOS as being in an affected area the exemption is automatic since CMS can identify the physician as exemption eligible for the 2017 performance period. Please note that physicians can still report and possibly earn a positive adjustment, but otherwise all physicians in Georgia will automatically receive a neutral adjustment for 2017.