



Merit-based Incentive Payment System (MIPS)

2021 Extreme and Uncontrollable Circumstances Exception Application Guide



Contents

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How to Use This Guide



Please Note: This guide was prepared for informational purposes only and isn't intended to grant rights or impose obligations. The information provided is only intended to be a general summary. It isn't intended to take the place of the written law, including the regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

Purpose: This guide will provide general information about the Extreme and Uncontrollable Circumstances (EUC) Exception application and provide step-by-step instructions on how to complete the application.

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Hyperlinks

Hyperlinks to the [QPP website](#) are included throughout the guide to direct you to more information and resources.



Extreme and Uncontrollable Circumstances Application Overview

Extreme and Uncontrollable Circumstances Application Overview

Overview

We understand that there may be circumstances out of your control that make it difficult for you to meet program requirements. To reduce this burden, we provide an opportunity for qualifying clinicians, groups, virtual groups and Alternative Payment Model (APM) Entities to apply for performance category reweighting for MIPS.

What	<p>The MIPS Extreme and Uncontrollable Circumstances (EUC) Exception Application allow you to request one or more performance categories be reweighted to 0%.</p> <p>See Appendix A and Appendix B for more information on performance category reweighting in traditional MIPS and the APM Performance Pathway (APP).</p>
Who	<p>Individual Clinicians, Groups, Virtual Groups and APM Entities</p> <ul style="list-style-type: none">• Third Party Intermediaries can submit an application with permission from the clinician or practice.
Why	<p>You can submit an application to have your MIPS quality, cost, improvement activities, and/or Promoting Interoperability performance categories reweighted to 0% if:</p> <ul style="list-style-type: none">• You experience an extreme and uncontrollable circumstance outside of your control, such as a natural disaster, ransomware attack or public health emergency (PHE) (e.g. COVID-19 pandemic), that prevents you from collecting data for an extended period of time, or that could impact your performance on cost measures. <p>Note: APM Entities are required to request reweighting for all performance categories.</p>
When	<p>The application will close on December 31, 2021, at 8 p.m. ET.</p>
Where	<p>Sign in to qpp.cms.gov with your HCQIS Access and Roles Profile (HARP) account.</p> <p>You must have a HCQIS Access Roles and Profile (HARP) account to complete and submit an exception application. For more information on HARP accounts, please refer to the Register for a HARP Account document in the QPP Access User Guide (ZIP).</p> <p>Note: APM Entity representatives must have the Security Official role in order to complete the Extreme and Uncontrollable Circumstances exception application on behalf of their entity. Refer to the Connect to an Organization document in the QPP Access User Guide (ZIP) for more information on requesting the Security Official role.</p>
How	<ol style="list-style-type: none">1. Register for a HARP account2. Sign in to qpp.cms.gov3. Select 'Exceptions Applications' on the left-hand navigation4. Select 'Add New Exception'5. Select 'Extreme and Uncontrollable Circumstances Exception'6. Complete the application for individual, group, virtual group, or APM Entity participation



Extreme and Uncontrollable Circumstances Application Overview

Policies for Individual Clinicians, Groups, and Virtual Groups

Skip ahead to policies for [APM Entities](#).

EUC applications can be submitted for one or more performance categories.

- Any performance category that isn't included in the application is eligible for scoring, even if no data are submitted, unless the clinician or group qualifies for reweighting under another policy.

Any data you submit, or is submitted on your behalf, will override reweighting for that performance category and the category will be scored.

- If you later determine that you're able to collect data for a performance category approved in your application, you can submit that data and it will be scored.
- If the cost performance category is included in the application, cost measures won't be scored even if data is submitted for other performance categories.
- If you submit Medicare Part B Claims measures during the performance year, this will override quality performance category reweighting. However, if you request and are approved for reweighting in all 4 performance categories and don't submit data for another performance category, your MIPS Final Score for the 2021 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2023.

You must be scored on at least 2 performance categories to earn a MIPS Final Score other than the performance threshold.

When fewer than 2 performance categories can be scored (meaning 1 performance category is weighted at 100% of your MIPS Final Score, and the other performance categories are weighted at 0%), the MIPS Final Score for the 2021 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2023.

You will be scored in any performance category that's not included in your application, unless you qualify for reweighting through another policy.

For example:

- If you don't meet the case minimum for any cost measures, the cost performance category will be reweighted.
- Certain clinician types and individuals, groups, and virtual groups with certain special statuses qualify for automatic reweighting of the Promoting Interoperability performance category.
 - For additional information on automatic reweighting on Promoting Interoperability, review the [2021 Promoting Interoperability Quick Start Guide \(PDF\)](#).

Extreme and Uncontrollable Circumstances Application Overview

Individual Clinicians, Groups, Virtual Groups Reporting Via Traditional MIPS

Example

Scenario	Outcome
<p>You are a MIPS eligible clinician (or group or virtual group) that is planning to report traditional MIPS. You submit an application to have all 4 performance categories reweighted, but later determine you are able to report the improvement activities and Promoting Interoperability performance categories.</p>	<p>You will receive a MIPS Final Score based on the data submitted.</p> <ul style="list-style-type: none">• The improvement activities performance category will be weighted at 15%.• The Promoting Interoperability performance category will be weighted at 85%.• The quality performance category will retain a 0% weight because you didn't submit quality data.• The cost performance category will retain a 0% weight because there are no data submission requirements associated with the cost performance category (reweighting can't be voided).

Extreme and Uncontrollable Circumstances Application Overview

Individual Clinicians and Groups Reporting Via APP

Example

Scenario	Outcome
<p>You are a MIPS eligible clinician (or group) planning to report the APP. You submit an application to reweight the quality performance category and your application was approved.</p>	<p>You will receive a MIPS Final Score based on the data submitted.</p> <ul style="list-style-type: none">• The improvement activities performance category will be weighted to 25%.• The Promoting Interoperability performance category will be weighted to 75%.• The quality performance category will be weighted at 0% provided no data is submitted.• The cost performance category will retain a 0% weight (because cost isn't scored under the APP).

Extreme and Uncontrollable Circumstances Application Overview

APM Entities

APM Entities

APM Entities in the following models can submit an EUC application on behalf of their MIPS eligible clinicians:

- Medicare Shared Saving Program
- Next Generation Accountable Care Organization (ACO) Model
- Vermont Medicare ACO Model
- Comprehensive Primary Care Plus (CPC+)
- Comprehensive ESRD Care (CEC)
- Bundled Payments for Care Improvement (BPCI) Advanced Model
- Oncology Care Model (OCM)
- Maryland Primary Care Program
- Independence at Home Demonstration
- Primary Care First (PCF)*
- Value in Opioid Use Disorder Treatment (ViT)*
- Direct Contracting (DC)*

*Some APM Entities may not be able to submit an EUC application until summer 2021 when we update our systems with information from the 1st APM snapshot. The 1st APM snapshot is generally available in early July. (You won't be able to create a QPP account, required to submit an EUC application, until our system recognizes your organization.)

Extreme and Uncontrollable Circumstances Application Overview

APM Entities (continued)

APM Entity applications must be submitted for all performance categories.

- You can't submit an application for an APM Entity to request reweighting in 1 or 2 performance categories.
- This is different from our policy for individual, group, and virtual group applications.

If your APM Entity's application is approved, the APM Entity will receive a final score equal to the performance threshold even if data are submitted for the APM Entity.

- The MIPS eligible clinicians in the APM Entity group will receive a neutral MIPS payment adjustment unless they have a higher final score from individual or group participation.
- Data submitted for an APM Entity will not override performance category reweighting from an approved application.
- This is different from our policy for individual, group, and virtual group applications.

At least 75% of MIPS eligible clinicians in an APM Entity must qualify for reweighting of the Promoting Interoperability performance category.

- Given that APM Entities are required to request reweighting for all performance categories in their EUC application, at least 75% of the MIPS eligible clinicians in the Entity will need to qualify for reweighting in the Promoting Interoperability performance category.
- They may qualify automatically or by meeting one of the criteria for the [MIPS Promoting Interoperability Hardship Exception](#).


APM Entity representatives must have a QPP Security Official role to complete the Extreme and Uncontrollable Circumstances exception application on behalf of their entity.

Review the Connect to an Organization resource in the [QPP Access User Guide \(ZIP\)](#) for more information on obtaining the Security Official role.

An approved application won't affect your model-specific reporting requirements.

- For example, Shared Savings Program ACOs must report the quality measures identified under the APP to meet their requirements under the Shared Savings Program, unless otherwise excepted under that APM.





Extreme and Uncontrollable Circumstances Application Process: Frequently Asked Questions

Extreme and Uncontrollable Circumstances Application Process: Frequently Asked Questions

How Does CMS Assess EUC Application Requests?

We consider the variables affecting your ability to collect and submit data for each performance category when reviewing your application for performance category reweighting due to extreme and uncontrollable circumstances.

During our review, we will review both the event circumstances and the length of time you were impacted as indicated in your application to assess the ability of a MIPS eligible clinician to submit data for each performance category selected in the application.

Example:

The performance period for an improvement activity is a continuous 90-day period (or as specified in the activity description) whereas the performance period for the quality performance category is 12 months, so an issue lasting 3 months may have more impact on the availability of measures for the quality performance category than your ability to perform and attest to improvement activities.

Extreme and Uncontrollable Circumstances Application Process: Frequently Asked Questions

How Long Does it Take to Process an EUC Exception Application?

The length of time it takes to process application requests depends on the volume of requests we receive. We review all application requests in the order that they were received. Once a decision is made regarding your application, you will receive a notice of our decision and the status of your application will be reflected in your QPP Account on qpp.cms.gov.

Where Can I Look for a Status Update on EUC Hardship Exception?

You can monitor your application status in your QPP Account on qpp.cms.gov.

Are We Required to Submit Documentation with Our Exception Application?

No, you aren't required to submit documentation with your application.

However, you should retain documentation of the circumstances supporting your application for your own records in the event that you are selected by CMS for data validation or an audit.

How Can I Correct a Mistake Made on Our EUC Hardship Exception?

If you identified an error with your exception application, please contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8 a.m.-8 p.m. Eastern Time (ET) or by e-mail at: QPP@cms.hhs.gov.

Corrections can't be made after the application period has closed.



Extreme and Uncontrollable Circumstances Application Process: Frequently Asked Questions

Can Additional Staff Members Access/Receive Notifications About the Status of Our EUC Exception Application?

Yes, you can add additional staff or representatives who should receive notifications about the status of the application.

In the Additional Access section of the application, provide the email address(es) of additional staff or representatives who would like to receive notifications.

Please note that the additional staff or representatives must have a HARP credentials in order to see the application in qpp.cms.gov.



Extreme and Uncontrollable Circumstances Application Process: Application Steps

Extreme and Uncontrollable Circumstances Application Process: Application Steps

Step 1: Sign in to Your QPP Account

Sign in to your QPP Account at qpp.cms.gov with your HARP credentials.

Home /

QPP Account

SIGN IN REGISTER

Sign in to QPP

USER ID

PASSWORD

Show password

Forgot your user id or password? [Recover ID](#) or [reset password](#)

STATEMENT OF TRUTH

In order to sign in, you must agree to this: I certify to the best of my knowledge that all of the information that will be submitted will be true, accurate, and complete. If I become aware that any submitted information is not true, accurate, and complete, I will correct such information promptly. I understand that the knowing omission, misrepresentation, or falsification of any submitted information may be punished by criminal, civil, or administrative penalties, including fines, civil damages, and/or imprisonment.

Yes, I agree

[Sign in >](#) [Don't have an account? Register](#)

Note: If you haven't signed into qpp.cms.gov before, you must register for an account to obtain your HARP credentials. For more information on how to create an account view the [QPP Account Access Guide \(ZIP\)](#).

*The screenshots included in this user guide were based on the QPP test environment. Because we are always working to incorporate feedback and improve experience, there may be differences between these screenshots and what you see on qpp.cms.gov.

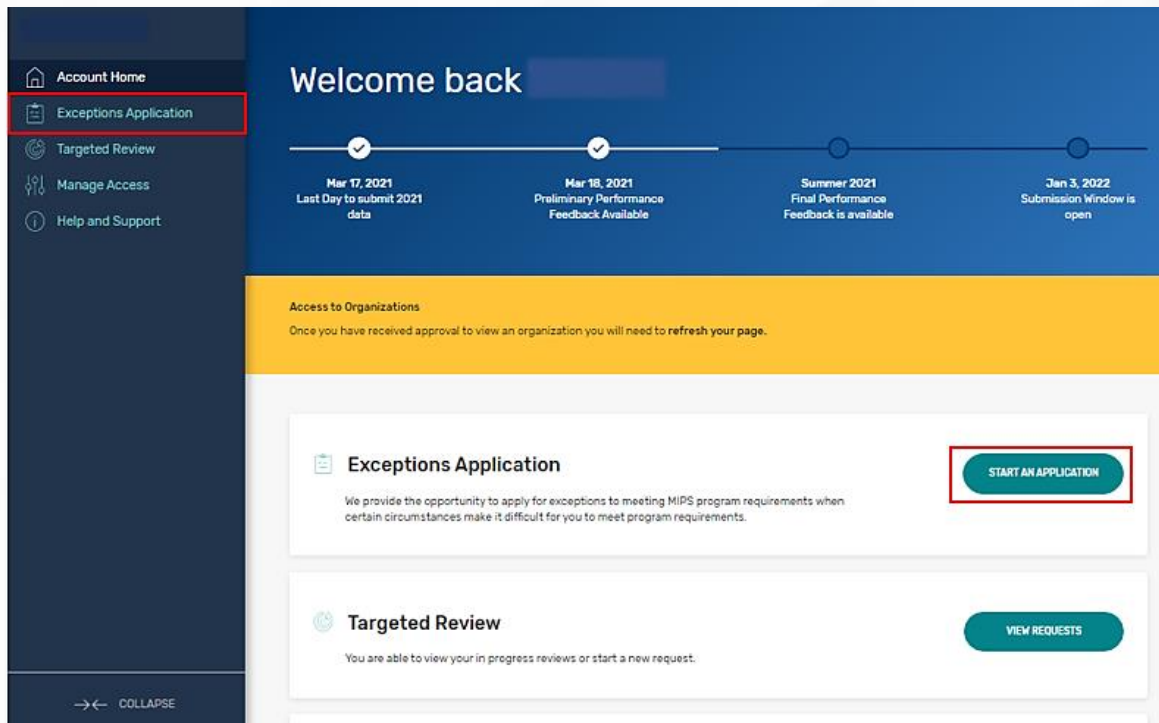


Extreme and Uncontrollable Circumstances Application Process: Application Steps

Step 2: Navigate to Your Exception Applications

Once you are signed into your account select:

- The **Exception Application** tab in the left-hand navigation menu, then click + **Add New QPP Exception**, or
- The **Start an Application** quick link on the home page.



You can create and submit a new exception request until December 31, 2021.

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Extreme and Uncontrollable Circumstances Application Process: Application Steps

Step 3: Select Extreme and Uncontrollable Circumstances Exception

Select the **Extreme and Uncontrollable Circumstances Exception**, then click **Continue**.

Add New Exception

Exception Type * ?

Promoting Interoperability Hardship Exception

MIPS eligible clinicians, groups, and virtual groups may submit a Promoting Interoperability Hardship Exception Application citing one of the following specified reasons:

- You're a small practice
- You have decertified EHR technology
- You have insufficient Internet connectivity
- You face extreme and uncontrollable circumstances such as disaster, practice closure, severe financial distress or vendor issues
- You lack control over the availability of CEHRT

Extreme and Uncontrollable Circumstances Exception

The Extreme and Uncontrollable Circumstances application is reserved for instances where there is indeed an Extreme and Uncontrollable Circumstance, such as a **natural disaster, public health emergency or other significant event**, that prevents collecting data for an extended period of time, or that could impact performance on cost measures.

CANCEL CONTINUE >

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Extreme and Uncontrollable Circumstances Application Process: Application Steps

Step 4: Select Application Type

Select the **participation level** of which you intend (or intended) to participate in MIPS.

← Add New Extreme and Uncontrollable Circumstances Application

Application Type: * ?

Individual

Group

Virtual Group

APM Entity

CANCEL SAVE SAVE & CONTINUE >

Your options are:

Participation Level	Required Information
Individual Clinician	<ul style="list-style-type: none">National Provider Identifier (NPI)Practice Affiliation
Group	<ul style="list-style-type: none">Taxpayer Identification Number (TIN)
Virtual Group	<ul style="list-style-type: none">Virtual Group Identifier
APM Entity	<ul style="list-style-type: none">APM Entity ID

Note: If you're an individual clinician, group, or virtual group requesting reweighting of only 1 or 2 MIPS performance categories and intend to submit data for others, it is critical that you select the application type that aligns with the level at which you intend to submit data to MIPS (i.e. at the individual, group or virtual group level).

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Extreme and Uncontrollable Circumstances Application Process: Application Steps

Step 5: Enter Submitter Details

Enter your **contact information** (as the submitter) and identify your **relationship to the party** identified in the application.

The screenshot shows a web form titled "Submitter Details". It contains several input fields and a dropdown menu. Two callout boxes provide instructions: one for the "Contact Information" section and another for the "Submitter/Third Party Intermediary Relationship" dropdown.

Submitter Details

Please enter your contact information so that we may be able to contact you if further information is required

Contact Information * ?

Phone Number Ext. (Optional)

Email

Submitter/Third Party Intermediary Relationship * ?

Please Specify

- Please Specify
- Clinician
- Consultant
- Physician Staff
- Registry / OCDR
- EHR Vendor
- Other

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Extreme and Uncontrollable Circumstances Application Process: Application Steps

Step 6: Enter Additional Staff in Additional Access

You can identify additional users to receive notifications about the application in the Additional Access section.

If there's a HARP account associated with the email address(es) you provide, the person will be able to sign in to their QPP Account on qpp.cms.gov and access the application.

Additional Access

Additional Staff Access Email(s) ?

Enter email address(es)

Hit enter/comma after each entry to add multiple

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Extreme and Uncontrollable Circumstances Application Process: Application Steps

Step 7: Enter the Extreme and Uncontrollable Circumstances Event Type

Select the appropriate Event Type for the extreme and uncontrollable circumstance you experienced.

Then, enter the timeframe for which you were impacted by the extreme and uncontrollable event by completing the **Event Date Range**. If you continue to be impacted by the event, select **Event Still Persists**.

Extreme and Uncontrollable Circumstances Details

Event Type * ?

COVID-19

Natural Disaster

Ransomware / Malware

Medical Issue

Other

Event Date Range * ?

Start Date To

Event Still Persists

Event Description * ?

Enter a brief description of the event

6000 characters remaining

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Extreme and Uncontrollable Circumstances Application Process: Application Steps

Step 8: Provide a Brief Description of the Challenges You Experienced

Provide a **brief description** about the data collection challenges that you experienced due to the extreme and uncontrollable event and how your 2021 performance data will be impacted.

Extreme and Uncontrollable Circumstances Details

Event Type * ?

COVID-19

Natural Disaster

Ransomware / Malware

Medical Issue

Other

Event Date Range * ?

Start Date To

Event Still Persists

Event Description * ?

Enter a brief description of the event

6000 characters remaining

Note: You don't need to submit supporting documentation with your application. However, you should retain documentation of the circumstances supporting your application for your own records in the event that you are selected by CMS for data validation or an audit.

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Extreme and Uncontrollable Circumstances Application Process: Application Steps

Step 9: Select MIPS Performance Categories

Select each **MIPS performance category** for which you are requesting reweighting by checking the corresponding box next to the category name.

Select the performance category or categories for which data collection or performance has been affected by the reported event. If this application is approved, the performance categories you select will be weighted at 0% and you aren't required to submit data for them. You are still required to report data and will be scored in any performance category you don't select unless you qualify for reweighting for another reason.

Performance Category(ies) Affected *

Quality
Select this category when the event or circumstance has affected your performance or ability to collect quality data for a significant portion of the 12 month performance period. If this category is approved for reweighting, you won't receive a score in this category unless data are submitted for it.

Promoting Interoperability
Select this category when the event or circumstance has affected your performance or ability to collect promoting interoperability data for any 90 consecutive day period during the calendar year. If this category is approved for reweighting, you won't receive a score in this category unless data are submitted for it.

Improvement Activities
Select this category when the event or circumstance has affected your ability to implement any improvement activity for any 90 consecutive day period during the calendar year. If this category is approved for reweighting, you won't receive a score in this category unless data are submitted for it.

Cost
Select this category when you believe the event or circumstance has affected your performance on cost measures. If this category is approved for reweighting, you won't receive a score in this category even if data are submitted for other performance categories.

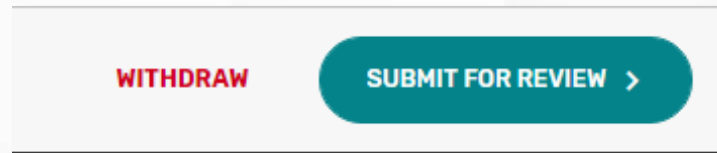
Note: All performance categories will be automatically selected for APM Entity applications.

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Extreme and Uncontrollable Circumstances Application Process: Application Steps

Step 10: Submit Extreme and Uncontrollable Circumstances Application

Once you are done with your application, click the **Submit for Review** button.



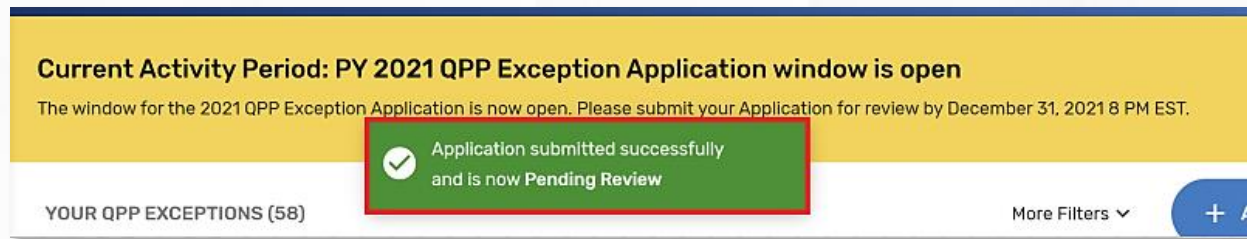
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Extreme and Uncontrollable Circumstances Application Process: Application Steps

Extreme and Uncontrollable Circumstances Exception Application Submission Confirmation

After you submit your application, you will receive a message stating that your application has been successfully submitted and is pending review .

You will also receive an email notification.



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Help, Resources, Glossary, and Version History

Where Can You Go for Help?

Contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8 a.m.-8 p.m. Eastern Time (ET) or by e-mail at: QPP@cms.hhs.gov.

- Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.

Connect with your [local Technical Assistance organization](#). We provide no-cost technical assistance to small, underserved, and rural practices to help you successfully participate in the Quality Payment Program.

Visit the Quality Payment Program [website](#) for other [help and support](#) information, to learn more about [MIPS](#), and to check out the resources available in the [QPP Resource Library](#).

Additional Resources

The [QPP Resource Library](#) houses fact sheets, measure specifications, specialty guides, technical guides, user guides, helpful videos, and more. We will update this table as more resources become available.

- [2021 Automatic Extreme and Uncontrollable Circumstances Policy Fact Sheet \(PDF\)](#)
- [2021 MIPS Promoting Interoperability Hardship Exception Application Guide \(PDF\)](#)

Version History

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

Date	Description
05/19/2021	Original Version



Appendix

Appendix A: 2021 Performance Year MIPS Performance Category Weight Redistribution Policies for Individual Clinicians, Groups, and Virtual Groups Reporting Traditional MIPS

The table below illustrates the 2021 performance category weights and reweighting policies that CMS will apply to clinicians, groups, and virtual groups reporting traditional MIPS.

Refer to [Appendix B](#) for reweighting policies for APM Entities reporting traditional MIPS.

If fewer than 2 performance categories can be scored (meaning 1 performance category is weighted at 100%, or all performance categories are weighted at 0%), the clinician, group, or virtual group will receive a final score equal to the performance threshold and the MIPS eligible clinicians will receive a neutral payment adjustment in the 2023 payment year.

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
No Reweighting				
Standard Weighting under traditional MIPS	40%	20%	15%	25%
Reweight 1 Performance Category				
No Cost (Cost → Quality and Promoting Interoperability)	55%	0%	15%	30%
No Improvement Activities (Improvement Activities → Quality)	55%	20%	0%	25%
No Promoting Interoperability (Promoting Interoperability → Quality)	65%	20%	15%	0%
No Quality (Quality → Promoting Interoperability)	0%	20%	15%	65%

Table continues on the following slide.



Appendix A: 2021 Performance Year MIPS Performance Category Weight Redistribution Policies for Individual Clinicians, Groups, and Virtual Groups Reporting Traditional MIPS (continued)

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

Appendix B. 2021 Performance Year MIPS Performance Category Weight Redistribution Policies for APM Entities and APM Participants Reporting the APP

The table below illustrates the 2021 performance category weights and reweighting policies that CMS will apply to APM Entities reporting traditional MIPS and to individual clinicians, groups and APM Entities reporting the APP.

Reminder: APM Entities can only submit an EUC Application for **all** performance categories.

Reminders:

- Cost is not scored under the APP.
- There are no reporting requirements for the improvement activities performance category under the APP for PY 2021. Participants reporting via the APP will automatically receive full credit for the improvement activities performance category.
- Participants reporting via the APP will follow the same reporting requirements as traditional MIPS for the Promoting Interoperability performance category.

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