Quality Payment PROGRAM

2024 Merit-based Incentive Payment System Automatic Extreme and Uncontrollable Circumstances Policy

UPDATED: 10/15/2024

Purpose

The Merit-based Incentive Payment System (MIPS) automatic extreme and uncontrollable circumstances (EUC) policy was established to support clinicians affected by natural disasters and public health emergencies. Clinicians affected by certain circumstances may have their performance categories reweighted and receive a neutral payment adjustment. This resource addresses the automatic EUC policy as it applies to **individual MIPS eligible clinicians** for the 2024 performance year.

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

The MIPS automatic EUC policy doesn't apply to group, subgroup, virtual group, or Alternative Payment Model (APM) Entity participation.

The 2024 MIPS EUC Exception application is now available for individuals, groups, virtual groups, and APM Entities.

Who Does the MIPS Automatic EUC Policy Apply to?

The MIPS automatic EUC policy applies to MIPS eligible clinicians identified as located in a Centers for Medicare & Medicaid Services (CMS)-designated region affected by extreme and uncontrollable circumstances (such as a Federal Emergency Management Agency (FEMA)-designated major disaster or Secretary of Health and Human Services determined public health emergency) during the 2024 performance year. For these clinicians, we aim to reduce their reporting burden by eliminating the need to submit an application to request reweighting of one or more MIPS performance categories. We'll update this resource if additional qualifying circumstances are identified that trigger this policy.

The MIPS automatic EUC policy doesn't apply to group, subgroup, 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 or APM Entity participation.
- Clinicians that register to report a MIPS Value Pathway (MVP) as a subgroup and submit data will be scored according to existing MIPS scoring policies. The MIPS eligible clinicians in the subgroup will receive the subgroup's final score and associated payment adjustment unless they have a higher score from individual, group, or APM Entity 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. MIPS eligible clinicians in the APM Entity will receive the APM Entity's final score and associated payment adjustment unless they have a higher score from individual or group participation.

How Does the MIPS Automatic EUC Policy Work?

We identify MIPS eligible clinicians 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 QPP Participation Status Tool.

MIPS eligible clinicians who are automatically identified and subject to MIPS will have all 4 performance categories weighted at 0% of their final score.

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 current and check their performance feedback on the QPP website to ensure the policy was applied correctly, if applicable.**

Note: The QPP Participation Status Tool will be updated in December 2024 with all of the qualifying events that triggered the MIPS automatic EUC policy in the 2024 performance year.

Individual clinicians will automatically have all 4 MIPS performance categories reweighted to 0% and receive a score equal to the performance threshold, which will result in a neutral payment adjustment for the 2026 MIPS payment year **unless**:

- The clinician submits data, or can be scored, as an individual for 2 or more MIPS performance categories (quality, improvement activities, and/or Promoting Interoperability):
  - Data submission by individual clinicians voids the 0% performance category weight on a category-by-category basis;
  - Clinicians who participate in an APM are eligible to receive automatic credit in the improvement activities performance category; for these MIPS eligible clinicians, submitting data for the quality and/or Promoting Interoperability performance categories will initiate a score in the improvement activities performance category (they'll automatically receive 20 out of 40 possible points);

- Clinicians will receive a final score based on the data submitted and available for scoring;

- The clinician is part of a group, subgroup, or APM Entity that submits data on behalf of its clinicians; OR
- The clinician is part of a virtual group.

Under the MIPS 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 MIPS automatic EUC policy doesn't apply to group, subgroup, 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 refer to 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 and circumstances that trigger the MIPS automatic EUC policy through the QPP listserv. You can subscribe to the QPP listserv on the QPP website by scrolling to the bottom of the webpage. In addition, we'll 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(s) listed on the FEMA website under PA-A and PA-B:

- The designated counties in Texas for Hurricane Beryl
  - Texas: DR-4798-TX
- The designated counties in Florida for Hurricane Debby
  - Florida: DR-4806-FL
- The designated parishes in Louisiana for Hurricane Francine (Parishes updated 10/15/2024)
  - Louisiana: DR-4817-LA
- The designated counties in Florida, Georgia, North Carolina, South Carolina and Tennessee for Hurricane or Tropical Storm Helene (Counties updated 10/15/2024)
  - Florida: DR-4828-FL
  - Georgia: DR-4830-GA
  - North Carolina: DR-4827-NC
  - South Carolina: DR-4829-SC
  - Tennessee: DR-4832-TN

If, and when we identify qualifying events, you can find information about designated disaster areas in this fact sheet and on the CMS Emergency Preparedness & Response Operations webpage. Clinicians can monitor these pages for updates on designated disaster areas. Appendix B lists the counties identified as located in CMS-designated areas that have been affected by an extreme and uncontrollable circumstance.

Note: It is at CMS' discretion whether or not a region affected by extreme and uncontrollable circumstances is identified as having qualified to trigger the MIPS automatic EUC policy. If you were part of an extreme and uncontrollable circumstance that didn't trigger the MIPS automatic EUC policy, you may submit a 2024 MIPS EUC Exception application, which is now available for individuals, groups, virtual groups, and APM Entities.

What if I'm part of a group, subgroup, 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% to all performance categories, resulting in a neutral payment adjustment for the 2026 MIPS payment year to MIPS eligible clinicians located in the designated area(s), **unless** your group, subgroup or APM Entity submits data on your behalf during the 2024 submission period (January 2, 2025 – March 31, 2025) or you're part of a CMS-approved virtual group.

A group, subgroup, or APM Entity (with clinicians who qualify for the automatic EUC policy) that chooses to submit data at the group, subgroup, or APM Entity level for the 2024 performance year will be scored as a group, subgroup, or APM Entity according to the existing and applicable 2024 MIPS scoring policies.

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

Groups and virtual groups can complete an EUC Exception application if the extreme and uncontrollable circumstance affects their ability to collect data, at the group or virtual group level, for a specific MIPS performance category or categories. (Subgroups will inherit any reweighting approved for their affiliated group; they can't request reweighting independent of their affiliated group's status.) APM Entities also may submit an application but must request reweighting for all performance categories.

What should I do if I'm eligible for the MIPS automatic EUC policy, but my performance feedback doesn't reflect the correct reweighting?

If you believe that you qualified for the automatic EUC policy, but don't see it reflected in your performance feedback, you should submit a targeted review. Targeted reviews can be requested upon release of 2024 MIPS final scores and for 30 days after 2026 MIPS payment adjustments are released.

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

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

- If you submit data for 1 performance category (or no data at all), you'll receive a final score equal to the performance threshold and receive a neutral payment adjustment.

  - **Note**: If you participate in an APM, you're eligible to receive automatic credit in the improvement activities performance category. Submitting data for the quality or Promoting Interoperability performance categories will initiate a score in the improvement activities performance category (20 out of 40 possible points), and you'll receive a final score based on the data submitted and available for scoring.

- If you submit data for 2 or 3 performance categories (quality, improvement activities, and/or Promoting Interoperability), you'll be scored on the performance categories for which you submitted data. Your final score will determine your payment adjustment.
  - **Note**: If you participate in an APM, you're eligible to receive automatic credit in the improvement activities performance category. Submitting data for the quality and Promoting Interoperability performance categories will initiate a score in the improvement activities performance category (20 out of 40 possible points), and you'll receive a final score based on the data submitted and available for scoring.
- You **won't** be scored in any performance category for which data isn't submitted (see exception noted above for APM participants).
- 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, subgroup, virtual group, or APM Entity participation.)

What happens if I've submitted Medicare Part B claims before an event that triggers the MIPS automatic EUC policy?

If a MIPS eligible clinician in a small practice reports quality measures through Medicare Part B claims collection **and** we receive data for the clinician before 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 as individuals for either the Promoting Interoperability or improvement activities performance categories.

Please note that **we'll no longer automatically calculate a score for the quality performance category at the group level** when clinicians in a small practice report quality measures through Medicare Part B claims. We'll calculate a group score only if the group also submits data for another performance category at the group level.

Where Can I Learn More?

- QPP Exception Applications webpage
- FEMA-Designated Disaster Areas webpage
- CMS's Emergency Preparedness & Response Operations webpage
- HHS's Declarations of a Public Health Emergency webpage

To receive QPP information and updates, you can subscribe to the QPP listserv by scrolling to the bottom of the QPP webpage. You can also contact the QPP Service Center by email at QPP@cms.hhs.gov, by creating a QPP Service Center ticket, or by phone at 1-866-288-8292 (Monday through Friday 8 a.m. – 8 p.m. ET). People who are deaf or hard of hearing can dial 711 to be connected to a TRS Communications Assistant.

Version History

Date	Change Description
10/15/2024	Updated to reflect that the automatic EUC policy applies to certain counties in Louisiana for Hurricane Francine and Florida, Georgia, North Carolina, South Carolina and Tennessee for Hurricane or Tropical Storm Helene. Updated Florida county list for Hurricane Debby.
08/20/2024	Updated to reflect that the automatic EUC policy applies to certain counties in Florida following Hurricane Debby.
08/02/2024	Updated to reflect that the automatic EUC policy applies to certain counties in Texas following Hurricane Beryl.
05/13/2024	Original version.

Appendix A

Table 1 depicts the 2024 MIPS performance category reweighting policies that CMS will apply under the MIPS automatic EUC policy to clinicians who submit MIPS data as individuals. (Clinicians in a small practice should refer to Table 2.)

Table 1: Reweighting for Clinicians Not in a Small Practice

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 1 Performance Category					
Quality Only[1]	100%	0%	0%	0%	Neutral

[1] APM participants are eligible to receive automatic credit in the improvement activities performance category; for these MIPS eligible clinicians, submitting data for the quality and/or Promoting Interoperability performance categories will initiate a score in the improvement activities performance category (20 out of 40 possible points), and they'll receive a final score based on the data submitted and available for scoring.

Data Submitted	Quality Category Weight	Promoting Interoperability Category Weight	Improvement Activities Category Weight	Cost Category Weight	Payment Adjustment
Promoting Interoperability Only[1]	0%	100%	0%	0%	Neutral
Improvement Activities Only	0%	0%	100%	0%	Neutral
Submit Data for 2 Performance Categories					
Quality **and** Promoting Interoperability[1]	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

Table 2 depicts the 2024 MIPS performance category reweighting policies that CMS will apply under the MIPS automatic EUC policy to clinicians in small practices who submit MIPS data as individuals.

Table 2: Reweighting for Clinicians in a Small Practice

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

Data Submitted	Quality Category Weight	Promoting Interoperability Category Weight	Improvement Activities Category Weight	Cost Category Weight	Payment Adjustment
Submit Data for 1 Performance Category					
Quality Only[2]	100%	0%	0%	0%	Neutral
Promoting Interoperability Only[2]	0%	100%	0%	0%	Neutral
Improvement Activities Only	0%	0%	100%	0%	Neutral

Data Submitted	Quality Category Weight	Promoting Interoperability Category Weight	Improvement Activities Category Weight	Cost Category Weight	Payment Adjustment
Submit Data for 2 Performance Categories					
Quality **and** Promoting Interoperability[2]	70%	30%	0%	0%	Positive, Negative, or Neutral
Quality **and** Improvement Activities	50%	0%	50%	0%	Positive, Negative, or Neutral
Improvement Activities **and** Promoting Interoperability	0%	85%	15%	0%	Positive, Negative, or Neutral
Submit Data for 3 Performance Categories					

[2] APM participants are eligible to receive automatic credit in the improvement activities performance category; for these MIPS eligible clinicians, submitting data for the quality and/or Promoting Interoperability performance categories will initiate a score in the improvement activities performance category (20 out of 40 possible points), and they'll receive a final score based on the data submitted and available for scoring.

Quality **and** Improvement Activities **and** Promoting Interoperability	55%	30%	15%	0%	Positive, Negative, or Neutral

Appendix B

The table below lists the affected counties/areas located in a CMS-designated region affected by an extreme and uncontrollable circumstance during the 2024 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 been identified on the FEMA disaster declaration webpage after publication.)

Texas Hurricane Beryl – Texas Counties – DR-4798-TX Note: The automatic EUC policy applies to the following counties in Texas:		
PA-A Anderson Angelina Aransas Austin Bowie Brazoria Brazos Burleson Calhoun Cameron Camp Cass Chambers Cherokee Colorado DeWitt Fayette Fort Bend Freestone Galveston Goliad Gregg Grimes	Hardin Harris Harrison Hidalgo Houston Jackson Jasper Jefferson Kenedy Kleberg Lavaca Lee Leon Liberty Madison Marion Matagorda Milam Montgomery Morris Nacogdoches Newton Nueces	Orange Panola Polk Refugio Robertson Rusk Sabine San Augustine San Jacinto San Patricio Shelby Trinity Tyler Upshur Victoria Walker Waller Washington Webb Wharton Willacy

PA-B Anderson Angelina Aransas Austin Bowie Brazoria Brazos Burleson Calhoun Cameron Camp Cass Chambers Cherokee Colorado DeWitt Fayette Fort Bend Freestone Galveston Goliad Gregg	Grimes Hardin Harris Harrison Hidalgo Houston Jackson Jasper Jefferson Kenedy Kleberg Lavaca Lee Leon Liberty Madison Marion Matagorda Milam Montgomery Morris Nacogdoches Newton	Nueces Orange Panola Polk Refugio Robertson Rusk Sabine San Augustine San Jacinto San Patricio Shelby Trinity Tyler Upshur Victoria Walker Waller Washington Webb Wharton Willacy

Florida Hurricane Debby – Florida Counties – DR-4806-FL Note: The automatic EUC policy applies to the following counties in Florida:		
PA-A Alachua Baker Bradford Charlotte Clay Columbia Dixie Duval Franklin	Gilchrist Hamilton Jefferson Lafayette Leon Levy Madison Manatee Nassau	Pinellas Sarasota St. Johns Sumter Suwannee Taylor Union Wakulla

PA-B Alachua Baker Bay Bradford Brevard Calhoun Charlotte Citrus Clay Collier Columbia DeSoto Dixie Duval Escambia Flagler Franklin Gadsden Gilchrist Glades Gulf	Hamilton Hardee Hendry Hernando Highlands Hillsborough Holmes Jackson Jefferson Lafayette Lake Lee Leon Levy Liberty Madison Manatee Marion Monroe Nassau Okaloosa	Okeechobee Orange Osceola Pasco Pinellas Polk Putnam Santa Rosa Sarasota Seminole St. Johns Sumter Suwannee Taylor Union Volusia Wakulla Walton Washington

Louisiana Hurricane Francine – Louisiana Parishes – DR-4817-LA Note: The automatic EUC policy applies to the following parishes in Louisiana:		
PA-A Ascension Assumption East Baton Rouge East Feliciana Lafourche Livingston	Orleans Plaquemines St. Charles St. Helena St. James St. John the Baptist	St. Martin St. Mary St. Tammany Terrebonne Washington West Feliciana
PA-B Ascension Assumption East Baton Rouge East Feliciana Lafourche Livingston	Orleans Plaquemines St. Charles St. Helena St. James St. John the Baptist	St. Martin St. Mary St. Tammany Terrebonne Washington West Feliciana

Florida Hurricane Helene – Florida Counties – DR-4828-FL Note: The automatic EUC policy applies to the following counties in Florida:		
PA-A Alachua Bradford Charlotte Citrus Columbia Dixie Duval Franklin Gadsden Gilchrist	Gulf Hamilton Hernando Hillsborough Jefferson Lafayette Lee Leon Levy Liberty Madison	Manatee Nassau Pasco Pinellas Putnam Sarasota Suwannee Taylor Union Wakulla
PA-B Alachua Bradford Charlotte Citrus Columbia Dixie Duval Franklin Gadsden Gilchrist	Gulf Hamilton Hernando Hillsborough Jefferson Lafayette Lee Leon Levy Liberty Madison	Manatee Nassau Pasco Pinellas Putnam Sarasota Suwannee Taylor Union Wakulla

Georgia Hurricane Helene – Georgia Counties – DR-4830-GA Note: The automatic EUC policy applies to the following counties in Georgia:		
PA-A Appling Atkinson Bacon Ben Hill Berrien Brantley Brooks Bryan	Echols Effingham Emanuel Evans Glascock Glynn Grady Irwin	Monroe Montgomery Pierce Pulaski Richmond Screven Tattnall Telfair

Bulloch Burke Camden Candler Charlton Chatham Clinch Coffee Colquitt Columbia Cook Dodge Dooly	Jeff Davis Jefferson Jenkins Johnson Lanier Laurens Liberty Lincoln Long Lowndes McDuffie McIntosh Mitchell	Thomas Tift Toombs Treutlen Twiggs Ware Washington Wayne Wheeler Wilcox Wilkinson Worth
PA-B Appling Atkinson Bacon Ben Hill Berrien Brantley Brooks Bryan Bulloch Burke Camden Candler Chatham Clinch Coffee Colquitt Columbia Cook Dodge Dooly	Echols Effingham Emanuel Evans Glascock Glynn Grady Irwin Jeff Davis Jefferson Jenkins Johnson Lanier Laurens Liberty Lincoln Long Lowndes McDuffie McIntosh Mitchell	Monroe Montgomery Pierce Pulaski Richmond Screven Tattnall Telfair Thomas Tift Toombs Treutlen Twiggs Ware Washington Wayne Wheeler Wilcox Wilkinson Worth

North Carolina Tropical Storm Helene – North Carolina Counties – DR-4827-NC
Note: The automatic EUC policy applies to the following counties in North Carolina:

PA-A Alexander Alleghany Ashe Avery Buncombe Burke Caldwell Catawba Clay Cleveland	Eastern Band of Cherokee Indians of North Carolina Gaston Haywood Henderson Jackson Lincoln Macon Madison McDowell	Mecklenburg Mitchell Polk Rutherford Swain Transylvania Watauga Wilkes Yancey
PA-B Alexander Alleghany Ashe Avery Buncombe Burke Caldwell Catawba Clay Cleveland	Eastern Band of Cherokee Indians of North Carolina Gaston Haywood Henderson Jackson Lincoln Macon Madison McDowell	Mecklenburg Mitchell Polk Rutherford Transylvania Watauga Wilkes Yancey

South Carolina Hurricane Helene – South Carolina Counties – DR-4829-SC Note: The automatic EUC policy applies to the following counties in South Carolina:		
PA-A Abbeville Aiken Allendale Anderson Bamberg Barnwell Calhoun Catawba Indian Reservation Cherokee Chester	Colleton Edgefield Fairfield Greenville Greenwood Hampton Jasper Laurens Lexington McCormick	Newberry Oconee Orangeburg Pickens Richland Saluda Spartanburg Union Williamsburg York

PA-B Abbeville Aiken Allendale Anderson Bamberg Barnwell Calhoun Catawba Indian Reservation Cherokee Chester	Colleton Edgefield Fairfield Greenville Greenwood Hampton Jasper Laurens Lexington McCormick	Newberry Oconee Orangeburg Pickens Richland Saluda Spartanburg Union Williamsburg York

Tennessee Tropical Storm Helene – Tennessee Counties – DR-4832-TN Note: The automatic EUC policy applies to the following counties in Tennessee:		
PA-A Carter Claiborne Cocke Grainger Greene	Hamblen Hawkins Jefferson Johnson Sevier	Sullivan Unicoi Washington
PA-B Carter Claiborne Cocke Grainger Greene	Hamblen Hawkins Jefferson Johnson Sevier	Sullivan Unicoi Washington