

CMS Reweighting 2020 MIPS Cost Performance Category

The Centers for Medicare & Medicaid Services (CMS) recognizes the impact of the COVID-19 pandemic public health emergency (PHE) on clinicians across the country and we continue to offer flexibilities to provide relief where possible. Under § 414.1350(d)(3), the Merit-based Incentive Payment System (MIPS) cost performance category weight is 15% of the final score for the 2020 performance period/2022 MIPS payment year. We would like to inform all MIPS eligible clinicians that we're reweighting the cost performance category from 15% to 0% for the 2020 performance period. The 15% cost performance category weight will be redistributed to other performance categories in accordance with § 414.1380(c)(2)(ii)(D). Please see the table below for reweighting scenarios.

Our analysis of the underlying data for the 2020 performance year, in comparison to prior years' data, shows that the volume of data available to calculate the scores for the cost measures has significantly decreased overall. As a result, we do not believe we can reliably calculate scores for the cost measures that would adequately capture and reflect the performance of MIPS eligible clinicians. Given these circumstances, in accordance with § 414.1380(c)(2)(i)(A)(2), we will assign a weight of 0% to the cost performance category for the 2020 performance period and redistribute the prescribed weight of 15% to another performance category or categories.

Specifically, we do not believe we can reliably calculate scores for the cost measures based on the following reasons, as shown by our analysis of the cost performance category data for the 2020 performance year:

- A significant decrease in service utilization in 2020 demonstrates cost measures may not accurately characterize patient risk due to the lack of diagnosis information in the lookback periods used for risk adjustment.
- Episodes with COVID-19 diagnoses generally have higher observed and risk-adjusted costs, indicating COVID-19 impacted service utilization and wasn't sufficiently accounted for through risk adjustment.
- The overall number of clinicians who met 2020 cost measure case minimums substantially decreased from prior performance years. A substantial portion of clinicians had episodes with COVID-19.

Clinicians don't need to take any action as a result of this decision because the cost performance category relies on administrative claims data.

MIPS Performance Category Weight Redistribution Policies Finalized for the 2020 Performance Period

The table below illustrates the 2020 performance category weights and reweighting policies that CMS will apply to clinicians under MIPS. As a reminder, under § 414.1380(c), if a MIPS eligible clinician is scored on fewer than 2 performance categories (meaning 1 performance category is weighted at 100% or all performance categories are weighted at 0%), they will receive a final score equal to the performance threshold and a neutral MIPS payment adjustment for the 2022 MIPS payment year.

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
No Additional Reweighting Applies	55%	0%	15%	30%
Reweight 2 Performance Categories				
No Promoting Interoperability, No Cost	85%	0%	15%	0%
No Quality, No Cost	0%	0%	15%	85%
No Improvement Activities, No Cost	70%	0%	0%	30%

* This table may be found at § 414.1380(c)(2)(ii)(D).

This reweighting of the cost performance category applies in addition to the extreme and uncontrollable circumstances (EUC) policies under § 414.1380(c)(2)(i)(A)(6), § 414.1380(c)(2)(i)(A)(8), § 414.1380(c)(2)(i)(C)(2), and § 414.1380(c)(2)(i)(C)(3). Clinicians who aren't covered by the automatic EUC policy or who did not apply to request reweighting under the EUC policy will still have their cost performance category weighted to 0%.

Questions?

Please contact the Quality Payment Program at 1-866-288-8292 or by e-mail at: QPP@cms.hhs.gov. To receive assistance more quickly, 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.