



March 24, 2020

COVID-19 and Quality Reporting Programs: CMS Provides Exceptions and Extensions for Reporting and Data Submission

In furtherance of efforts to ease regulatory burdens while clinicians, providers and facilities fight the 2019 Novel Coronavirus (COVID-19), the Centers for Medicare and Medicaid Services (“CMS”) is implementing extreme and uncontrollable circumstances policy exceptions from reporting requirements and providing extensions for clinicians and providers participating in Medicare quality reporting programs. CMS is making the following exceptions to the reporting program requirements:

- For programs with data submission deadlines in April and May 2020, submission of such data is now *optional*, based on the facility’s choice to report.
- CMS will not use data reflecting services provided from January 1, 2020 through June 30, 2020 in calculations for Medicare quality reporting and value-based purchasing programs.

CMS notes that it is continuing to assess options to bring additional relief to clinicians, facilities and their staff. The following chart from CMS identifies the reporting program 2019 Data Submission and 2020 Data Submission updates.

Program	2019 Data Submission	2020 Data Submission
Provider Programs		
Quality Payment Program – Merit-Based Incentive Payment System (MIPS)	<p>Deadline extended to April 30, 2020</p> <p>MIPS eligible clinicians who have not submitted any MIPS data by April 30, 2020 will qualify for the automatic extreme and uncontrollable circumstances policy and will receive a neutral payment adjustment for the 2021 MIPS payment year.</p>	CMS is evaluating options for providing relief around participation and data submission for 2020
Medicare Shared Savings Program Accountable Care Organizations (ACOs)	Deadline extended to April 30, 2020	
Hospital Programs		
Ambulatory Surgical Center Quality Reporting Program		CMS will not count data from January 1, 2020 through June 30,

CrownWeb National ESRD Patient Registry and Quality Measure Reporting System	<p>Deadline for October 1, 2019 – December 31, 2019 (Q4) data submission optional.</p> <p>If Q4 is submitted, it will be used to calculate the 2019 performance and payment (where appropriate). If data for Q4 is unable to be submitted, the 2019 performance will be calculated based on data from January 1, 2019 – September 30, 2019 (Q1-Q3) and available data.</p>	2020 (Q1-Q2) for performance or payment programs. Data does not need to be submitted to CMS for this time period.
End-Stage Renal Disease (ESRD) Quality Incentive Program		<p>* For the <i>Hospital-Acquired Condition Reduction Program</i> and the <i>Hospital Value-Based Purchasing Program</i>, if data from January 1, 2020 – March 31, 2020 (Q1) is submitted, it will be used for scoring in the program (where appropriate).</p>
Hospital-Acquired Condition Reduction Program		
Hospital Inpatient Quality Reporting Program		
Hospital Outpatient Quality Reporting Program		
Hospital Readmissions Reduction Program		
Hospital Value-Based Purchasing Program		
Inpatient Psychiatric Facility Quality Reporting Program		
PPS-Exempt Cancer Hospital Quality Reporting Program		
Promoting Interoperability Program for Eligible Hospitals and Critical Access Hospitals		
Post-Acute Care Programs		
Home Health Quality Reporting Program	<p>Deadlines for October 1, 2019 – December 31, 2019 (Q4) data submission optional.</p> <p>If Q4 is submitted, it will be used to calculate the 2019 performance and payment (where appropriate).</p>	<p>* <i>Home Health and Hospice Consumer Assessment of Healthcare Providers and Systems (CAHPS)</i> survey data from January 1, 2020 through September 30, 2020 (Q1-Q3) does not need to be submitted to CMS.</p> <p>* For the <i>Skilled Nursing Facility (SNF) Value-Based Purchasing Program</i>, qualifying claims will be excluded from the claims-based SNF 30-Day All-Cause Readmission Measure (SNFRM, NQF #2510) calculation for Q1-Q2.</p>
Hospice Quality Reporting Program		
Inpatient Rehabilitation Facility Quality Reporting Program		
Long Term Care Hospital Quality Reporting Program		
Skilled Nursing Facility Quality Reporting Program		
Skilled Nursing Facility Value-Based Purchasing Program		

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We anticipate that additional guidance in response to COVID-19 will be issued in the coming days and weeks, which may include additional waivers or exceptions to CMS requirements. Health care providers who are or may be affected by the consequences of the COVID-19 pandemic should monitor additional development and announcements from CMS and other federal and state agencies. If you have any questions about the Quality Reporting Program exceptions and extensions, please contact a member of our [national Healthcare practice group](#).

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