The Physicians Advocacy Institute’s Medicare Quality Payment Program (QPP) Physician Education Initiative

2020 Promoting Interoperability (PI) Category Hardships and Reweighting Overview
2020 is the fourth year of the MACRA Quality Payment Program (QPP), under which physicians may choose to participate in an Advanced Alternative Payment Model (APM) or submit data to the Merit-Based Incentive Payment System (MIPS).

MIPS consolidates and sunsets the previous quality reporting programs by the Centers for Medicare and Medicaid Services (CMS), including the Physician Quality Reporting System (PQRS), Value-based Payment Modifier (VM), and the Electronic Health Records (EHR) Incentive program (Meaningful Use), into one program. In 2020, MIPS has four weighted performance categories: quality (45%), based on PQRS; cost (15%), based on VM; promoting interoperability (PI) (25%), previously advancing care information (ACI); and improvement activities (15%).

Certain physicians and other eligible clinicians can have the PI category reweighted to 0% and have the 25% reassigned to the quality category. This resource provides information on the hardship exceptions that can be applied for to have the PI category reweighted.
There are generally two ways for the PI category to be reweighted to 0%. First, CMS may automatically reweight the category for certain physicians and other eligible clinicians (ECs).¹ Second, some ECs may be able to submit a hardship application for reweighting the category.

The following physicians qualify for automatic reweighting to 0%:

- Ambulatory Surgical Center (ASC)-based MIPS ECs
- Hospital-based MIPS ECs (including off-campus outpatient hospital)
- Physicians assistants
- Nurse practitioners
- Clinical nurse specialists
- Certified registered nurse anesthetists
- Physicians lacking physical interaction with patients (non-patient facing)
- Physical therapists
- Occupational therapists
- Qualified speech-language pathologist
- Qualified audiologist
- Clinical psychologist
- Registered dietitian or nutrition professionals

Physicians can submit an application by December 31, 2020 for reweighting for one of the following hardships:

- Insufficient internet connectivity
- Extreme and uncontrollable circumstances, e.g., disaster practice, closure, severe financial distress, or vendor issues
- Lack of control over the availability of CEHRT
- MIPS eligible clinicians in small practices of 15 or fewer ECs
- Have decertified EHR technology

Note: Reporting the PI category is optional for these ECs. However, if they elect to report data for the PI category, they will be scored and PI will be 25% of their MIPS final score.

¹ For 2020, eligible clinicians include physicians (MD, DO, DDS, DMD, DPM, OD), osteopathic practitioners, chiropractors, physician assistants, nurse practitioners, certified nurse anesthetists, physical therapists, occupational therapists, clinical psychologists, qualified speech-language pathologists, qualified audiologists, registered dietitians or nutrition professionals.
Hospital-Based MIPS ECs Status

To get the hospital-based MIPS EC status and have the PI category reweighted to 0%, you must meet one of the following criteria depending on whether you are participating in MIPS at the individual level or group or Virtual Group level:

- **Individual Physicians** – you furnish at least 75% of your covered professional services in an inpatient hospital, on-campus outpatient hospital, off-campus outpatient hospital, or emergency room setting during the determination period.

- **Group or Virtual Groups** – more than 75% of MIPS ECs furnish their covered professional services in an inpatient hospital, on-campus outpatient hospital, off-campus outpatient hospital, or emergency room setting during the determination period.

**PI Category Reweighted to 0% and Quality Increases to 70%**

If the PI category is reweighted for either of these reasons, then for 2020, the weights for the four MIPS categories will be: quality (70%), cost (15%), PI (0%), and improvement activities (15%).
Where can I go for more information?

To learn more about the ACI category, please see the PAI PI Category Overview resource available on the MIPS Pathway page.

Additionally, please review the CMS PI Category Quick Start Guide, CMS PI Category page, and visit the PAI QPP Resource Center and the CMS QPP Resource Library for more information.