



2024 MIPS Data Submission Deadline Extended and EUC Applications to Reopen in Response to National IV Fluid Shortage

In response to the ongoing national intravenous (IV) fluid shortage, the Centers for Medicare & Medicaid Services (CMS) will reopen the 2024 Merit-based Incentive Payment System (MIPS) Extreme and Uncontrollable Circumstances (EUC) Exception Application to provide relief to practices impacted by the IV fluid shortage.

- **The application will reopen Monday, March 31, 2025, at 10 a.m. ET, and will close April 14, 2025, at 8 p.m. ET.**
- CMS is reopening the 2024 MIPS EUC Exception Application window in response to the national IV fluid shortage; therefore, **CMS will only accept applications citing the shortage as the basis for requesting reweighting under the MIPS EUC Exception.** Any applications submitted for reasons outside of the national IV fluid shortage will be denied.

CMS is also extending the MIPS data submission deadline until April 14, 2025, at 8 p.m. ET.

- **IMPORTANT!** The deadline for certain clinicians, groups, and Alternative Payment Model (APM) Entities to elect to participate in MIPS – because they are [opt-in eligible](#) due to the low-volume threshold or are partially qualifying APM participants ([Partial QPs](#)) – is still March 31, 2025, at 8 p.m. ET.

This announcement includes details about the following information:

- [2024 MIPS Data Submission Deadline](#)
- [Who Can Submit a 2024 MIPS EUC Exception Application Now?](#)
- [What If We've Already Submitted Some Data?](#)
- [How Do I Apply?](#)
- [Additional Resources](#)

2024 MIPS Data Submission Deadline Extended to April 14, 2025

MIPS eligible clinicians and their representatives can submit and update their MIPS data until **April 14, 2024, 8 p.m. ET**. We encourage submission of data as early as possible in advance of this extended deadline.

Please note: This extension will delay the mid-June timeline for releasing final scores and opening Targeted Review.

Opt-in Eligible Clinicians and Groups

- Opt-in eligible clinicians and groups exceed 1 or 2, but not all 3 of the MIPS low-volume threshold criteria.

- Opt-in eligible clinicians and groups who want to report MIPS data must complete their opt-in election by March 31, 2025, at 8 p.m. ET. (Data must be submitted by April 14, 2025, at 8 p.m. ET.)
- No action is required for opt-in eligible clinicians and groups who don't want to report MIPS data.
- Learn more in the [2024 MIPS Opt-In and Voluntary Reporting Election User Guide \(PDF, 2MB\)](#).

Partial QPs

- Partial QPs received at least 40% of Medicare Part B payments or saw at least 25% of Medicare patients through an Advanced APM Entity during the 2024 QP performance period (January 1 - August 31).
- Partial QPs who want to report MIPS data and get a MIPS payment adjustment must complete their Partial QP election by March 31, 2025, at 8 p.m. ET. (Data must be submitted by April 14, 2025, at 8 p.m. ET.)
- No action is required from Partial QPs who don't want to participate in MIPS.
- There's information about Partial QP elections in the [2024 APP Data Submission User Guide \(PDF, 3MB, pp. 21 – 24\)](#) and [2024 Traditional MIPS Data Submission User Guide \(PDF, 3MB, pp. 34 – 37\)](#).

Who Can Submit a 2024 MIPS EUC Exception Application?

Individual MIPS eligible clinicians, groups, virtual groups, and APM Entities participating in MIPS (including Shared Savings Program Accountable Care Organizations) affected by the national IV fluid shortage will be able to submit a 2024 MIPS EUC Exception Application **between March 31, 2025, 10 a.m. ET and April 14, 2025, 8 p.m. ET**. They can apply to request reweighting for any or all MIPS performance categories.

For example, you may need to apply if your practice's administrative and support staff has needed to focus on supply chains to support patients' care, affecting their capacity to collect and prepare data for reporting.

What If We've Already Submitted Some Data?

Individuals, groups, and virtual groups: We won't reweight any performance category for which we've received data.

However, if 3 of the performance categories are reweighted to 0% and only one performance category can be scored (e.g., because the MIPS eligible clinician, group, or virtual group submitted data for that category), then the MIPS eligible clinician, group, or virtual group will earn a final score equal to the performance threshold and the MIPS eligible clinician(s) will receive a neutral payment adjustment.

For example:

- A MIPS eligible clinician in a small practice reported Medicare Part B claims quality measures during the performance period, resulting in a quality score. Because we've received data, we won't reweight the quality performance category.
- If the other 3 performance categories are approved for reweighting to 0% (and no data was submitted for the improvement activities or Promoting Interoperability categories), the quality performance category would be weighted at 100% of the final score, resulting in a final score of 75 points (the performance threshold).

APM Entities: Data submission for an APM Entity **won't override** performance category reweighting.

- If approved, the MIPS eligible clinicians in the APM Entity will receive a score equal to the performance threshold and a neutral MIPS payment adjustment in the 2026 payment year unless the MIPS eligible clinicians had a higher final score (for the same TIN/NPI combination) from individual or group participation.

How Do I Apply?

When the 2024 MIPS EUC Exception Application reopens on March 31st, you'll take the following steps:

- [Sign in to the QPP website.](#)
- Select 'Exceptions Applications' on the left-hand navigation.
- Select 'Add New Exception'.
- Select 'Extreme and Uncontrollable Circumstances Exception'.
- Complete the application.
 - **When the application reopens, you MUST select "National IV Fluid Shortage" as the Event Type and include the impact to your practice in the Event Description.**

If your application is approved, you can still submit data should circumstances change before the submission deadline.

Additional Resources

- Please note that we're still working to update the QPP website and resources to reflect this information.
- We'll release an updated 2024 MIPS EUC Exception Application User Guide with additional screenshots by the end of March when we announce that the application has reopened.

For More Information on PY2024 MIPS Data Submission

Review the following submission resources are available on the [QPP Resource Library](#):

- [2024 Traditional MIPS Data Submission User Guide \(PDF, 3MB\)](#)
- [2024 MVPs Data Submission User Guide \(PDF, 4MB\)](#)
- [2024 APP Data Submission User Guide \(PDF, 2MB\)](#)
- [2024 QPP JSON Templates and Instructions \(ZIP, 856KB\)](#)
- [2024 CMS Web Interface User Guide \(PDF, 5MB\)](#)