

## Top Story: Applying for a MIPS Advancing Care Information Hardship Exception

If you are a practice group receiving Medicare reimbursement through the MIPS APM value-based payment system (like most MaineHealth ACO MSSP contract participants), you may be excluded from reporting data for the Advancing Care Information (ACI) category if you're experiencing specific EHR-related hardships.

CMS may grant an ACI reporting exclusion if your group applies for and receives a Quality Payment Program Hardship Exception for the following reasons:

- Insufficient internet connectivity
- Extreme and uncontrollable circumstances\*
- Lack of control over the availability of Certified EHR Technology (CEHRT)

Applications may be submitted via the [Quality Payment Program website](#) or by contacting the Quality Payment Program Service Center and working with a representative to verbally submit an application. Service center representatives may be reached at 866-288-8292. Once the application is submitted, you will receive a confirmation email indicating review status. Applications will be processed on a rolling basis.

### No Documentation Need Be Submitted

CMS does not require a MIPS-eligible group to submit documentation with the exception application. CMS will review the application to record the category selected and use the identifying information for each clinician and group listed on the application. Clinicians and groups should retain documentation of their circumstances supporting their application for their own records in the event CMS requests data validation or audit.

### Questions About Special Circumstances

#### **Q: Can MIPS-eligible groups that have switched CEHRT vendors apply for a hardship exception?**

A: Yes, if a MIPS-eligible group switches CEHRT vendors during the performance period and is unable to demonstrate meaningful use, the group may apply for an "extreme and uncontrollable circumstances" hardship exception. For example, if a MIPS-eligible group switches CEHRT vendors in 2017 and is unable to submit measures for the ACI category for the 2017 performance period, it can apply for an "extreme and uncontrollable circumstances" hardship exception, before the submission deadline.

\* "Extreme and uncontrollable circumstances" consist of one of the following.

- Disaster (e.g., a natural disaster in which the CEHRT was damaged or destroyed)
- Practice or hospital closure
- Severe financial distress (bankruptcy or debt restructuring)
- EHR certification/vendor issues (CEHRT issues)
  - If your product was decertified, you must provide the Certification Number.

A start and end date of when the circumstance occurred must be included in the application.

**Q: What if my EHR is decertified?**

A: If your EHR is decertified, you can still use it to submit ACI measures if your performance period ended before the decertification occurred. If your performance period ended after the decertification occurred, you can apply for a hardship exception.

**For More Information**

For more info about this MACRA/MIPS topic or others, please [email](#) the ACO's Gail Mazzone.