

# Quality Payment PROGRAM

## Merit-based Incentive Payment System (MIPS)

### 2022 Extreme and Uncontrollable Circumstances Exception Application Guide



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## How to Use This Guide



## Table of Contents

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**Please note:** This guide was prepared for informational purposes only and isn't intended to grant rights or impose obligations. The information provided is only intended to be a general summary. It isn't intended to take the place of the written law, including the regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

## Hyperlinks

Hyperlinks to the [Quality Payment Program website](#) are included throughout the guide to direct the reader to more information and resources.

**Purpose:** This guide will provide general information about the Extreme and Uncontrollable Circumstances (EUC) Exception application and provide step-by-step instructions on how to complete the application.



**Extreme and  
Uncontrollable  
Circumstances  
Application Overview**

# Extreme and Uncontrollable Circumstances Application Overview

## Overview

We understand that there may be circumstances out of your control that make it difficult for you to meet program requirements. To reduce this burden, we provide an opportunity for qualifying clinicians, groups, virtual groups and Alternative Payment Model (APM) Entities to apply for performance category reweighting for MIPS.

<b>What</b>	<p>The MIPS Extreme and Uncontrollable Circumstances (EUC) Exception application allows you to request reweighting for one or more performance categories to 0%.</p> <p>See <a href="#">Appendix A1</a>, <a href="#">Appendix A2</a>, and <a href="#">Appendix B</a> for more information on performance category reweighting in traditional MIPS and the APM Performance Pathway (APP).</p>
<b>Who</b>	<p>Individual clinicians, groups, virtual groups, and APM Entities</p> <ul style="list-style-type: none"><li>• Third Party Intermediaries can submit an application with permission from the clinician or practice.</li></ul>
<b>Why</b>	<p>You can submit an application to have your MIPS quality, cost, improvement activities, and/or Promoting Interoperability performance categories reweighted to 0% if:</p> <ul style="list-style-type: none"><li>• You experience an extreme and uncontrollable circumstance outside of your control, such as a natural disaster, ransomware attack or public health emergency (PHE) (e.g. COVID-19 pandemic), that prevents you from collecting data for an extended period of time, or that could impact your performance on cost measures.</li></ul> <p><b>Note:</b> APM Entities are required to request reweighting for all performance categories.</p>
<b>When</b>	<p>Now through January 3, 2023, at 8 p.m. ET.</p>
<b>Where</b>	<p>Sign in to <a href="https://qpp.cms.gov">qpp.cms.gov</a> with your HCQIS Access and Roles Profile (HARP) account.</p> <p>You must have a HCQIS Access Roles and Profile (HARP) account to complete and submit an exception application. For more information on HARP accounts, please refer to the <b>Register for a HARP Account</b> document in the <a href="#">QPP Access User Guide (ZIP)</a>.</p> <p><b>Note:</b> APM Entity representatives must have the Security Official role in order to complete the Extreme and Uncontrollable Circumstances exception application on behalf of their entity. Refer to the Connect to an Organization document in the <a href="#">QPP Access User Guide (ZIP)</a> for more information on requesting the Security Official role.</p>
<b>How</b>	<ol style="list-style-type: none"><li>1. <a href="#">Register for a HARP account</a></li><li>2. Sign in to <a href="https://qpp.cms.gov">qpp.cms.gov</a></li><li>3. Select 'Exceptions Applications' on the left-hand navigation</li><li>4. Select 'Add New Exception'</li><li>5. Select 'Extreme and Uncontrollable Circumstances Exception'</li><li>6. Complete the application for individual, group, virtual group, or APM Entity participation</li></ol>



## Policies for Individual Clinicians, Groups, and Virtual Groups

### **EUC applications can be submitted for one or more performance categories.**

- Any performance category that isn't included in the application is eligible for scoring, even if no data are submitted, unless the clinician or group qualifies for reweighting under another policy.

### **Any data you submit, or is submitted on your behalf, will override reweighting for that performance category and the category will be scored.**

- If you later determine that you're able to collect data for a performance category approved in your application, you can submit that data and it will be scored.
- If the cost performance category is included in the application, cost measures won't be scored even if data is submitted for other performance categories.
- If you submit Medicare Part B Claims measures during the performance year, this will override quality performance category reweighting. However, if you request and are approved for reweighting in all 4 performance categories and don't submit data for another performance category, your MIPS final score for the 2022 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2024.

### **You must be scored on at least 2 performance categories to earn a MIPS final score other than the performance threshold.**

When fewer than 2 performance categories can be scored (meaning 1 performance category is weighted at 100% of your MIPS final score, and the other performance categories are weighted at 0%), the MIPS final score for the 2022 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2024.

You will be scored in any performance category that's not included in your application, unless you qualify for reweighting through another policy.

#### **For example:**

- If you don't meet the case minimum for any cost measures, the cost performance category will be reweighted.
- You qualify for reweighting under the automatic Extreme and Controllable Circumstances policy.
  - Review the [2022 Automatic Extreme and Uncontrollable Circumstances Fact Sheet \(PDF\)](#) for additional information.
- Certain clinician types and individuals, groups, and virtual groups with certain special statuses qualify for automatic reweighting of the Promoting Interoperability performance category.
  - For additional information on automatic reweighting on Promoting Interoperability, review the [2022 Promoting Interoperability Quick Start Guide \(PDF\)](#).



## Intersection Between the Automatic EUC Policy and the Application-Based EUC Policy

If you qualify for reweighting under the automatic EUC policy, then we'll reweight all 4 performance categories to 0% (rather than just the categories included in your EUC application). We'll score any performance category for which data is submitted.

### Example

Scenario	Outcome
<p>A MIPS eligible clinician who is eligible for the automatic EUC policy has also submitted an EUC-exception application. The application was approved for reweighting in the Promoting Interoperability performance category, and the clinician submits data for the quality and improvement activities performance categories.</p>	<p>You will be scored as follows:</p> <ul style="list-style-type: none"><li>• The quality and improvement activities performance categories will be scored because you submitted data for those categories</li><li>• The cost performance category is reweighted to 0% under the automatic EUC policy.</li><li>• The Promoting Interoperability performance category is also reweighted to 0% under the automatic EUC policy.</li></ul> <p><b>Note</b>, in this example, the EUC application wasn't needed to reweight the Promoting Interoperability performance category due to the automatic EUC policy.</p>



# Extreme and Uncontrollable Circumstances Application Overview

## Individual Clinicians, Groups, and Virtual Groups Reporting Via Traditional MIPS

### Example

Scenario	Outcome
<p>You're a MIPS eligible clinician (or group or virtual group) that is planning to report via <b>traditional MIPS</b>. You submit an application to have all 4 performance categories reweighted, but later determine you are able to report the improvement activities and Promoting Interoperability performance categories.</p>	<p>You will receive a MIPS final score based on the data submitted.</p> <ul style="list-style-type: none"><li>• The improvement activities performance category will be weighted at 15%.</li><li>• The Promoting Interoperability performance category will be weighted at 85%.</li><li>• The quality performance category will retain a 0% weight because you didn't submit quality data.</li><li>• The cost performance category will retain a 0% weight because there are no data submission requirements associated with the cost performance category (reweighting can't be voided).</li></ul>

# Extreme and Uncontrollable Circumstances Application Overview

## Individual Clinicians and Groups Reporting Via APP

### Example

Scenario	Outcome
<p>You're a MIPS eligible clinician (or group) planning to report via the <b>APP</b>. You submit an application to reweight the quality performance category and your application was approved.</p>	<p>You will receive a MIPS final score based on the data submitted.</p> <ul style="list-style-type: none"><li>• The improvement activities performance category will be weighted to 25%.</li><li>• The Promoting Interoperability performance category will be weighted to 75%.</li><li>• The quality performance category will be weighted at 0% provided no data is submitted.</li><li>• The cost performance category will retain a 0% weight (because cost isn't scored under the APP).</li></ul>

## APM Entities

### APM Entities

APM Entities in the following models can submit an EUC application on behalf of their MIPS eligible clinicians:

- Medicare Shared Saving Program
- Vermont Medicare ACO Model
- Bundled Payments for Care Improvement (BPCI) Advanced Model
- Oncology Care Model (OCM)
- Maryland Total Cost of Care
- Independence at Home Demonstration
- Primary Care First (PCF)-
- Value in Opioid Use Disorder Treatment (ViT)
- Direct Contracting (DC)-
- Comprehensive Care for Joint Replacement (CJR) Payment
- Kidney Care Choices (KCC)

## APM Entities (continued)

### **APM Entity applications must be submitted for all performance categories.**

- You can't submit an application for an APM Entity to request reweighting in 1 or 2 performance categories.
- This is different from our policy for individual, group, and virtual group applications.

### **If your APM Entity's application is approved, the APM Entity will receive a final score equal to the performance threshold even if data are submitted for the APM Entity.**

- The MIPS eligible clinicians in the APM Entity will receive a neutral MIPS payment adjustment unless they have a higher final score from individual or group participation.
- Data submitted for an APM Entity will not override performance category reweighting from an approved application.
- This is different from our policy for individual, group, and virtual group applications.

### **At least 75% of MIPS eligible clinicians in an APM Entity must qualify for reweighting of the Promoting Interoperability performance category.**

- Given that APM Entities are required to request reweighting for all performance categories in their EUC application, at least 75% of the MIPS eligible clinicians in the Entity will need to qualify for reweighting in the Promoting Interoperability performance category.
- They may qualify automatically or by meeting one of the criteria for the [MIPS Promoting Interoperability Hardship Exception](#).

### **APM Entity representatives must have a QPP Security Official role to complete the Extreme and Uncontrollable Circumstances exception application on behalf of their entity.**

- Review the Connect to an Organization resource in the [QPP Access User Guide \(ZIP\)](#) for more information on obtaining the Security Official role.

### **An approved application won't affect your model-specific reporting requirements.**

- For example, Shared Savings Program ACOs must report the quality measures identified under the APP to meet their requirements under the Shared Savings Program, unless otherwise excepted under that APM.



# **Extreme and Uncontrollable Circumstances Application Process: Frequently Asked Questions**

## How Does CMS Assess EUC Application Requests?

We consider the variables affecting your ability to collect and submit data for each performance category when reviewing your application for performance category reweighting due to extreme and uncontrollable circumstances.

During our review, we will review both the event circumstances and the length of time you were impacted as indicated in your application to assess the ability of a MIPS eligible clinician to submit data for each performance category selected in the application.

### Example:

The performance period for an improvement activity is a continuous 90-day period (or as specified in the activity description) whereas the performance period for the quality performance category is 12 months. An issue lasting 3 months may have more impact on the availability of measures for the quality performance category than your ability to perform and attest to improvement activities.

# Extreme and Uncontrollable Circumstances Application Process: Frequently Asked Questions

## How Long Does it Take to Process an EUC Exception Application?

- The length of time it takes to process application requests depends on the volume of requests we receive. We review all application requests in the order that they were received. Once a decision is made regarding your application, you will receive a notice of our decision and the status of your application will be reflected in your QPP Account on [qpp.cms.gov](https://qpp.cms.gov).

## Where Can I Look for a Status Update on My EUC Exception Application?

- You can monitor your application status in your QPP Account on [qpp.cms.gov](https://qpp.cms.gov).

## Are We Required to Submit Documentation with Our EUC Exception Application?

- No, you aren't required to submit documentation with your application.
- However, you should retain documentation of the circumstances supporting your application for your own records in the event that you are selected by CMS for data validation or an audit. See our [2022 MIPS Data Validation Criteria Guide \(ZIP\)](#) for information on the data validation and audit process.

## How Can I Correct a Mistake Made on Our EUC Exception Application?

- If you identified an error with your exception application, please contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8 a.m.-8 p.m. ET or by e-mail at: [QPP@cms.hhs.gov](mailto:QPP@cms.hhs.gov).

## Can Additional Staff Members Access/Receive Notifications About the Status of Our EUC Exception Application?

- Yes, you can add additional staff or representatives who should receive notifications about the status of the application.
- In the **Additional Access** section of the application, provide the email address(es) of additional staff or representatives who would like to receive email notifications.
- Please note that the additional staff or representatives must have a HARP credentials in order to see the application in qpp. **Important Note:** Corrections can't be made after the application period has closed.





**Extreme and Uncontrollable  
Circumstances Application  
Process: Application Steps**

# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 1: Sign in to Your QPP Account

Sign in to your QPP Account at [qpp.cms.gov](http://qpp.cms.gov) with your HARP credentials.

**Note:** If you haven't signed into [qpp.cms.gov](http://qpp.cms.gov) before, you must register for an account to obtain your HARP credentials.

The screenshot shows the 'QPP Account' sign-in interface. At the top, there are links for 'Sign in' and 'Register'. Below this is the heading 'Sign in to QPP'. The form includes a 'USER ID' field with a placeholder 'User ID', a 'PASSWORD' field with a placeholder 'Password', and a 'Show password' checkbox. A link for 'Forgot your user id or password? Recover ID or reset password' is provided. Below the password field is a 'STATEMENT OF TRUTH' section with a text box containing a certification statement and a 'Yes, I agree' checkbox. At the bottom, there is a blue 'Sign in >' button and a link for 'Don't have an account? Register'.

\*The screenshots included in this user guide were based on the QPP test environment. Because we are always working to incorporate feedback and improve experience, there may be differences between these screenshots and what you see on [qpp.cms.gov](http://qpp.cms.gov).

# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 2: Navigate to Your Exception Applications

Once you are signed into your account select:

- The **Exception Application** tab in the left-hand navigation menu, then click + **Add New QPP Exception**

OR

- The **Start an Application** quick link on the home page.

You can create and submit a new exception request until 8 p.m. ET on January 3, 2023.

The screenshot displays the user interface for Tessa H. On the left is a dark navigation menu with the following items: Account Home, Eligibility & Reporting, Performance Feedback, APM Incentive Payments, Exceptions Application, Targeted Review, Reports, Manage Access, and Help and Support. The main content area is titled 'Welcome back Tessa H!' and features a progress bar with four stages: 'Jan 3, 2022 Submission Window is open' (checked), 'Mar 18, 2022 Last Day to submit 2021 data' (checked), 'Mar 18, 2022 Preliminary Performance Feedback Available' (checked), and 'Summer 2022 Final Performance Feedback is available' (unchecked). Below the progress bar are three main cards: 1. 'Preliminary 2021 Performance Feedback Available' with a 'View Feedback' button. 2. '2021 Submission Window has Closed' with a 'View Eligibility Details' button. 3. 'Exceptions Application' with a 'Start an Application' button. At the bottom of the navigation menu is a 'COLLAPSE' button with a left-pointing arrow.

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# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 3: Select Extreme and Uncontrollable Circumstances Exception

Select the **Extreme and Uncontrollable Circumstances** Exception, then click **Continue**.

**Add New Exception**

Exception Type \*

MIPS Promoting Interoperability Performance Category Hardship Exception

The MIPS Promoting Interoperability Performance Category Hardship Exception application allows you to request reweighting specifically for the Promoting Interoperability performance category if you qualify for one of the reasons identified below.

- You are a small practice
- You have decertified EHR technology
- You have insufficient internet connectivity
- You face extreme and uncontrollable circumstances such as disaster, practice closure, severe financial distress or vendor issues
- You lack control over the availability of CEHRT

Extreme and Uncontrollable Circumstances Exception

The Extreme and Uncontrollable Circumstances Exception application allows you to request reweighting for any or all performance categories if you encounter an extreme and uncontrollable circumstance or public health emergency, such as COVID-19, that is outside of your control.

**All other events such as vendor issues, decertification of EHR, etc. should be filed as a Promoting Interoperability Hardship Exception.**

CANCEL CONTINUE >

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# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 4: Select Application Type

Select the **participation level** at which you intend (or intended) to participate in MIPS.

← Add New Extreme and Uncontrollable Circumstances Application

Application Type: \* ?

Individual

Group

Virtual Group

APM Entity

Clinician NPI \* ?

e.g. 1234567890

CANCEL SAVE SAVE & CONTINUE >

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# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 5: Enter Participation Level Information

Enter the required participation level information.

The required information for each participation level is as follows:

Participation Level	Required Information
Individual Clinician	<ul style="list-style-type: none"><li>National Provider Identifier (NPI)</li><li>Practice Affiliation</li></ul>
Group	<ul style="list-style-type: none"><li>Taxpayer Identification Number (TIN)</li></ul>
Virtual Group	<ul style="list-style-type: none"><li>Virtual Group Identifier</li></ul>
APM Entity	<ul style="list-style-type: none"><li>APM Entity ID</li></ul>

**Note:** If you're an individual clinician, group, or virtual group requesting reweighting of only 1 or 2 MIPS performance categories and intend to submit data for others, it is critical that you select the application type that aligns with the level at which you intend to submit data to MIPS (i.e. at the individual, group or virtual group level).

PY 2022 OPP EXCEPTION ID: 2706 VIEW/ADD COMMENTS | All changes saved SAVE & CLOSE

### EUC Application - BD (E&UC: Individual)

Individual Details

Clinician NPI	Clinician's Name	Clinician Type
0839723588 <a href="#">Change</a>	Brenda Drenenberger	Doctor of Medicine

Group Practice Name \* ?

- Select
- Select
- Pfeffer Group (TIN: \*\*\*\*\*9403)
- Not listed

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# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 6: Enter Submitter Details

Enter your **contact information** (as the submitter) and identify your **relationship to the party** identified in the application.

The screenshot shows a web form titled "EUC Application - BD (E&UC: Individual)". At the top, it displays "PY 2022 OPP EXCEPTION ID: 2706" and a "VIEW/ADD COMMENTS" link. A status indicator shows "All changes saved" and a "SAVE & CLOSE" button. The main section is "Submitter Details". It contains three required fields: "Contact Phone Number" with sub-fields for "Phone Number" (866-268-8292) and "Ext. (Optional)"; "Contact Email Address" (janedoe@pfeffergroup.com); and "Submitter/Third Party Intermediary Relationship" with a dropdown menu. The dropdown menu is open, showing options: "Please specify", "Please specify", "Clinician", "Consultant", "Physician Staff", "Registry / OCDR", "EHR Vendor", and "Other".

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# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 7: Enter Additional Staff in the Additional Access Section

You can identify additional users to receive notifications about the application in the **Additional Access** section. If there's a HARP account associated with the email address(es) you provide, the person will be able to sign in to their QPP Account on [qpp.cms.gov](http://qpp.cms.gov) and access the application.

PY 2022 OPP EXCEPTION ID: 2706 [VIEW/ADD COMMENTS](#) | ✓ All changes saved [SAVE & CLOSE](#)

**EUC Application - BD** (E&UC: Individual)

Additional Access

Additional Staff Access Email(s)

johndoe@pfeffergroup.com

jackdoe@pfeffergroup.com Enter email address(es)

Hit enter/comma after each entry to add multiple

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# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 8: Enter the Extreme and Uncontrollable Circumstances Event Type

Select the appropriate **Event Type** for the extreme and uncontrollable circumstance you experienced.

Then, enter the timeframe for which you were impacted by the extreme and uncontrollable event by completing the **Event Date Range**. If you continue to be impacted by the event, select **Event Still Persists**.

The screenshot shows a web application interface for entering event details. At the top, it displays 'PY 2022 QPP EXCEPTION ID: 2706' and a 'VIEW/ADD COMMENTS' link. The main title is 'EUC Application - BD (E&UC: Individual)'. A 'SAVE & CLOSE' button is visible in the top right corner, along with a status indicator 'All changes saved'. The form is titled 'Extreme and Uncontrollable Circumstances Details' and contains the following sections:

- Event Type \***: A list of radio button options: COVID-19, Natural Disaster, Ransom / Malware, Medical Issue, and Other.
- Event Date Range \***: Two date input fields labeled 'Start Date \*' and 'End Date \*' with a 'To' separator between them. Below these is a checkbox labeled 'Event Still Persists'.
- Event Description \***: A large text area with the placeholder text 'Enter a brief description of the event'. Below the text area, it indicates '6000 characters remaining'.

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# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 9: Provide a Brief Description of the Challenges You Experienced

Provide a **brief description** about the data collection challenges that you experienced due to the extreme and uncontrollable event and how your 2022 performance data will be impacted.



The screenshot shows a form field titled "Event Description" with a red asterisk and a help icon. Below the title is a large text input area with the placeholder text "Enter a brief description of the event". At the bottom right of the input area, it says "6000 characters remaining".

**Note:** You don't need to submit supporting documentation with your application.

However, you should retain documentation of the circumstances supporting your application for your own records in the event that you are selected by CMS for data validation or an audit.

See our [2022 MIPS Data Validation Criteria Guide \(2021\)](#) for information on the data validation and audit process.

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# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 10: Select MIPS Performance Categories

Select each **MIPS performance category** for which you are requesting reweighting by checking the corresponding box next to the category name, then select **Submit for Review**.

Performance Categories Affected \* ?

- Quality**  
Select this category when the event or circumstance has affected your performance or ability to collect quality data for a significant portion of the 12 month performance period. **If this category is approved for reweighting, you won't receive a score in this category unless data are submitted for it.**
- Promoting Interoperability**  
Select this category when the event or circumstance has affected your performance or ability to collect promoting interoperability data for any 90 consecutive day period during the calendar year. **If this category is approved for reweighting, you won't receive a score in this category unless data are submitted for it.**
- Improvement Activities**  
Select this category when the event or circumstance has affected your ability to implement any improvement activity for any 90 consecutive day period during the calendar year. **If this category is approved for reweighting, you won't receive a score in this category unless data are submitted for it.**
- Cost**  
Select this category when you believe the event or circumstance has affected your performance on cost measures. **If this category is approved for reweighting, you won't receive a score in this category even if data are submitted for other performance categories.**

WITHDRAW      SUBMIT FOR REVIEW >

**Note:** All performance categories will be automatically selected for APM Entity applications.

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# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Step 11: Submit Extreme and Uncontrollable Circumstances Application

Once you are done with your application, review the disclosures, then select the **Submit for Review** button.

**Certify and Submit for Review**

▼ Submission Summary EXPORT (PDF) ▲

**General Notice**

If an application is approved for reweighting of all categories and no data is submitted, the clinician, group or virtual group will receive a final score which is equal to the performance threshold score and receive a neutral MIPS payment adjustment. If the clinician, group, or virtual group associated with this application submits data for any performance category included in an approved application, data submission will void the reweighting for that performance category and be part of your final score. When fewer than 2 performance categories are scored, the final score for the 2021 MIPS performance period would be equal to the performance threshold, resulting in a neutral payment adjustment in the 2023 MIPS payment year.

**Disclosures**

Submission of this MIPS Extreme and Uncontrollable Circumstance Application is voluntary. Failure to provide necessary information to identify the clinician or group will result in processing delays or denial of the MIPS Extreme and Uncontrollable Circumstance Application.

**Notice**

Any person who knowingly files a statement of claim containing any misrepresentation or any false, incomplete or misleading information may be guilty of a criminal act punishable under law and may be subject to civil penalties.

**Certification of Clinician**

I certify that the information contained in this MIPS Extreme and Uncontrollable Circumstance Application is true, accurate, and complete to the best of my knowledge, information, and belief. If I become aware that any information contained in this application is not true, accurate, and complete, I will inform CMS promptly. I understand that:

- The MIPS Extreme and Uncontrollable Circumstance Application for the Quality Payment Program that I requested may result in a change in the amount the clinician will be paid from Federal funds.
- By filing the MIPS Extreme and Uncontrollable Circumstance Application, I am submitting information that will be used to assess a claim for Federal funds.
- Any person who knowingly files a statement of claim containing any false, incomplete, or misleading information, may be guilty of a criminal act punishable under Federal and state law and may be subject to civil penalties.

By submitting this Extreme and Uncontrollable Circumstances Hardship Exception Application, I am certifying that the details entered are correct to the best of my knowledge. Furthermore, I am submitting this request as if I physically signed and submitted a hard copy of this form.

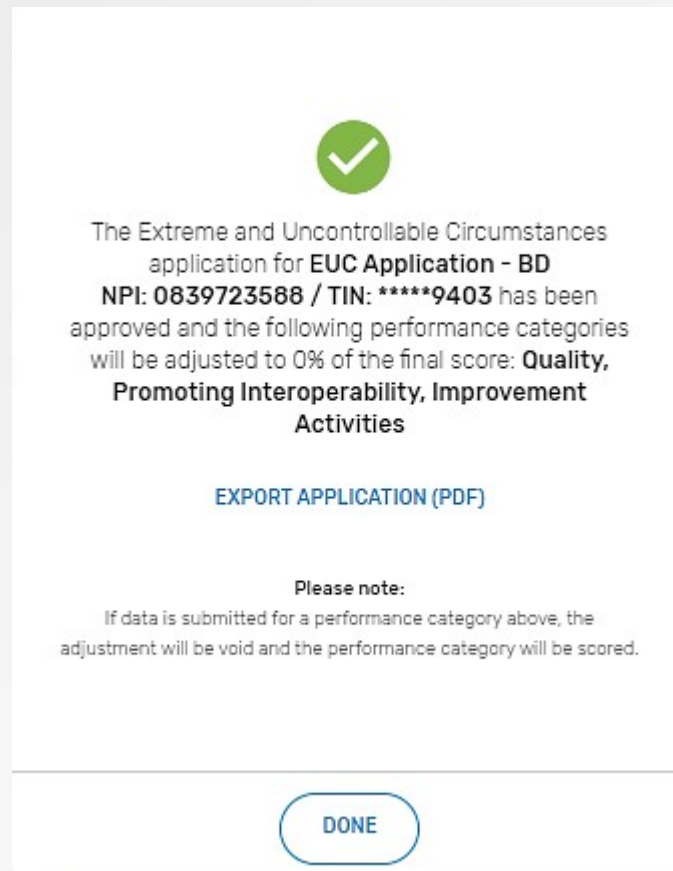
CLOSE CERTIFY & SUBMIT >



# Extreme and Uncontrollable Circumstances Application Process: Application Steps

## Extreme and Uncontrollable Circumstances Exception Application Submission Confirmation

After you submit your application, you will receive a message stating that your application has been successfully submitted and is pending review. You will also receive an email notification.



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## **Help, Resources, and Version History**



# Help, Resources, and Version History

## Where Can You Go for Help?

Contact the Quality Payment Program at 1-866-288-8292, Monday through Friday, 8 a.m.- 8 p.m. ET or by e-mail at: [QPP@cms.hhs.gov](mailto:QPP@cms.hhs.gov).

- Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.

Visit the Quality Payment Program [website](#) for other [help and support](#) information, to learn more about [MIPS](#), and to check out the resources available in the [QPP Resource Library](#).

## Additional Resources

The [Quality Payment Program Resource Library](#) houses fact sheets, measure specifications, specialty guides, technical guides, user guides, helpful videos, and more. We will update this table as more resources become available.

Resource
<a href="#">2022 Automatic Extreme and Uncontrollable Circumstances Policy Fact Sheet (PDF)</a>
<a href="#">2022 MIPS Promoting Interoperability Hardship Exception Application Guide (PDF)</a>

# Help, Resources, and Version History

## Version History

If we need to update this document, changes will be identified here.

Date	Description
10/06/2022	Updated deadline to request an exception to January 3, 2023, at 8 p.m. ET (slides 6 and 18)
05/02/2022	Original Posting.





## **Appendices**



## Appendix A1: 2022 Performance Year MIPS Performance Category Weight Redistribution Policies for Individual Clinicians, Groups, Virtual Groups, and APM Entities Reporting Traditional MIPS

The table below illustrates the 2022 performance category weights and reweighting policies that CMS will apply to clinicians, groups, and virtual groups reporting traditional MIPS. (Small practices should refer to Appendix A2.)

Refer to Appendix B for reweighting policies for APM Entities reporting the APP. APM Entities reporting traditional MIPS can **only** request reweighting for **all** performance categories.

If fewer than 2 performance categories can be scored (meaning 1 performance category is weighted at 100%, or all performance categories are weighted at 0%), the clinician, group, or virtual group will receive a final score equal to the performance threshold and the MIPS eligible clinicians will receive a neutral payment adjustment in the 2024 payment year.

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
<b>No Reweighting</b>				
<b>Standard Weighting under traditional MIPS</b>	30%	30%	15%	25%
<b>Reweight 1 Performance Category</b>				
<b>No Cost</b> (Cost <input type="checkbox"/> Quality and Promoting Interoperability)	55%	0%	15%	30%
<b>No Improvement Activities</b> (Improvement Activities <input type="checkbox"/> Quality)	45%	30%	0%	25%
<b>No Promoting Interoperability</b> (Promoting Interoperability <input type="checkbox"/> Quality)	55%	30%	15%	0%
<b>No Quality</b> (Quality <input type="checkbox"/> Promoting Interoperability)	0%	30%	15%	55%

Table continues on the following slide



## Appendix A1: 2022 Performance Year MIPS Performance Category Weight Redistribution Policies for Individual Clinicians, Groups, Virtual Groups, and APM Entities Reporting Traditional MIPS (continued)

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
<b>Reweight 2 Performance Categories</b>				
<b>No Cost + No Promoting Interoperability</b> (Cost + Promoting Interoperability □ Quality)	85%	0%	15%	0%
<b>No Cost + No Quality</b> (Cost + Quality □ Promoting Interoperability)	0%	0%	15%	85%
<b>No Cost + No Improvement Activities</b> (Cost + Improvement Activities □ Promoting Interoperability + Quality)	70%	0%	0%	30%
<b>No Promoting Interoperability + No Quality</b> (Promoting Interoperability + Quality □ Cost + Improvement Activities)	0%	50%	50%	0%
<b>No Promoting Interoperability + No Improvement Activities</b> (Promoting Interoperability + Improvement Activities □ Quality)	70%	30%	0%	0%
<b>Reweight 3 Performance Categories</b>				
If you have multiple performance categories reweighted to 0% so that a single performance category is weighted at 100% of your final score, you will receive a score equal to the performance threshold regardless of any data submitted or not and receive a neutral payment adjustment.				
<b>Reweight 4 Performance Categories</b>				
If all performance categories are reweighted to 0%, you will receive a score equal to the performance threshold regardless of any data submitted or not and receive a neutral payment adjustment.				

## Appendix A2. MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2022 Performance Year: Small Practices

The table below illustrates the 2022 performance category weights and reweighting policies that CMS will apply to small practices.

Refer to Appendix B for reweighting policies that apply to APM Entities reporting the APP. APM Entities reporting traditional MIPS can **only** request reweighting for **all** performance categories.

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
<b>No Reweighting</b>				
<b>Standard Weighting under traditional MIPS for small practices</b>	30%	30%	15%	25%
<b>Reweight 1 Performance Category</b>				
<b>No Cost</b> (Cost □ Quality and Promoting Interoperability)	55%	0%	15%	30%
<b>No Improvement Activities</b> (Improvement Activities □ Quality)	45%	30%	0%	25%
<b>No Promoting Interoperability</b> (Promoting Interoperability □ Quality and Improvement Activities)	40%	30%	30%	0%
<b>No Quality</b> (Quality □ Promoting Interoperability)	0%	30%	15%	55%

\*Table continues on next slide.



## Appendix A2. MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2022 Performance Year: Small Practices (continued)

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
<b>Reweight 2 Performance Categories</b>				
<b>No Cost + No Promoting Interoperability</b> (Cost + Promoting Interoperability □ Quality and Improvement Activities)	50%	0%	50%	0%
<b>No Cost + No Quality</b> (Cost + Quality □ Promoting Interoperability)	0%	0%	15%	85%
<b>No Cost + No Improvement Activities</b> (Cost + Improvement Activities □ Promoting Interoperability + Quality)	70%	0%	0%	30%
<b>No Promoting Interoperability + No Quality</b> (Promoting Interoperability + Quality □ Cost + Improvement Activities)	0%	50%	50%	0%
<b>No Promoting Interoperability + No Improvement Activities</b> (Promoting Interoperability + Improvement Activities □ Quality)	70%	30%	0%	0%
<b>No Quality + No Improvement Activities</b> (Quality + Improvement Activities □ Promoting Interoperability)	0%	30%	0%	70%
<b>Note:</b> If you have multiple performance categories reweighted to 0% so that a single performance category is weighted at 100% of your final score, you will receive a score equal to the performance threshold regardless of any data submitted or not submitted. See next slide for additional information.				

## Appendix B. 2022 Performance Year MIPS Performance Category Weight Redistribution Policies for APM Entities and APM Participants Reporting the APP

The table below illustrates the 2022 performance category weights and reweighting policies that CMS will apply to APM Entities reporting traditional MIPS and to individual clinicians, groups and APM Entities reporting via the APP.

**Reminder:** APM Entities can only submit an EUC Application for all performance categories.

### Reminders:






- Cost isn't scored under the APP.
- There are no reporting requirements for the improvement activities performance category under the APP for performance year 2022. Participants reporting via the APP will automatically receive full credit for the improvement activities performance category.
- Participants reporting via the APP will follow the same reporting requirements as traditional MIPS for the Promoting Interoperability performance category.

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
<b>No Reweighting</b>				
<b>Standard Weighting under the APP</b>	50%	0%	20%	30%
<b>Reweight 1 Performance Category</b>				
<b>No Promoting Interoperability</b> (Promoting Interoperability □ Quality)	75%	0%	25%	0%
<b>No Quality</b> (Quality □ Promoting Interoperability)	0%	0%	25%	75%
<b>Reweight 2+ Performance Categories</b>				

If you have multiple performance categories reweighted to 0% so that a single performance category is weighted at 100% of your final score, you will receive a score equal to the performance threshold regardless of any data submitted or not and receive a neutral payment adjustment.

## Appendix C. MIPS Promoting Interoperability Hardship Exception Application Status Descriptions

The table below provides a description of each application status in the order of which they occur.

Draft in Progress	Submitted - Pending Approval	Approved / Denied	Withdrawn
 Draft in Progress  You are currently working on your application and haven't submitted it yet.  Select Manage to continue working on your application.	 Submitted - Pending Approval  You have successfully completed and submitted your application.  Applications are reviewed in the order of which they are received.	 Approved  We completed our review of your application and approved your request.	 Withdrawn  You have withdrawn your application. You can withdraw your application at any point in the process.  An application can't be reopened after being withdrawn. You'll need to complete a new application.
		 Denied  We completed our review of your application and denied your request.	