

Extreme and Uncontrollable Circumstances Hardship Exception Application Guide

2023 Final Document versus 2024 Final Document

Burden impact: The changes in this guide don't reflect policies in the CY 2025 Physician Fee Scheduled (PFS) proposed rule for the Quality Payment Program. There is no impact to burden as a result of the changes reflected in this crosswalk.

Change #1:

Location:

2023 – Page 1

2024 – Page 1

Reason for Change:

Alignment with current program year

2023 Final Document text:

Title: 2023 Extreme and Uncontrollable Circumstances Exception Application Guide

2024 Final Document text:

Title: 2024 Extreme and Uncontrollable Circumstances Exception Application Guide

Change #2:

Location:

2023 – Page 6

2024 – Page 6

Reason for Change:

Updated based on policy changes for the 2024 performance year.

2023 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: Who

Subgroups *registered to report an MVP can request reweighting through the QPP Service Center; subgroup reweighting requests will be superseded by any reweighting approved for their affiliated group.* See Slide 11 for additional information.

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: Who

Subgroups *will inherit any reweighting applied to their affiliated group; they can't request reweighting independent of their affiliated group's status.* See Slide 11 for additional information.

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Change #3:

Location:

2023 – Page 6

2024 – Page 6

Reason for Change:

Updated based on policy changes for the 2024 performance year.

2023 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: N/A

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: Why

The 2019 Coronavirus (COVID-19) PHE ended on May 11, 2023. We're not accepting applications due to COVID-19 for the 2024 performance year.

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Change #4:

Location:

2023 – Page 6

2024 – Page 6

Reason for Change:

Updated dates for new performance year.

2023 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: When

The MIPS EUC Exception application will close at 8 p.m. ET on *January 2, 2024*.

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: When

The MIPS EUC Exception application will close at 8 p.m. ET on *December 31, 2024*.

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Change #5:

Location:

2023 – Page 7

2024 – Page 7

Reason for Change:

Updated dates for new performance year.

2023 Final Document text:

Section: Extreme and Uncontrollable Circumstances Exception Application Overview

Content: 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 2023 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2025.

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 2023 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2025.

You'll 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 2023 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 2023 Promoting Interoperability Quick Start Guide (PDF).

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: 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 2024 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2026.

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 2024 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2026.

You'll 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 *2024 Automatic Extreme and Uncontrollable Circumstances Fact Sheet (PDF, 323KB)* 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 of Promoting Interoperability, review the *2024 Promoting Interoperability Quick Start Guide (PDF, 1MB)*.

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Change #6:

Location:

2023 – Page 9

2024 – Page 9

Reason for Change:

Clarify performance category reweighting if all four categories are approved for an Extreme and Uncontrollable Circumstances Exception.

2023 Final Document text:

Section: Extreme and Uncontrollable Circumstances Exception Application Overview

Content: You're planning to report traditional MIPS or registered to report an MVP. You submit an application to have all 4 performance categories reweighted, but later determine you're able to report the improvement activities and Promoting Interoperability performance categories.

2023 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: You're planning to report traditional MIPS or registered to report an MVP. You submit an application to have all 4 performance categories reweighted to 0%, but later determine you're able to report the improvement activities and Promoting Interoperability performance categories.

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Change #7:

Location:

2023 – Page 11

2024 – Page 11

Reason for Change:

Updated based on policy changes for the 2024 performance year.

2023 Final Document text:

Section: Extreme and Uncontrollable Circumstances Exception Application Overview

Content:

Clinicians who register to report an MVP as a subgroup will inherit the performance category reweighting approved for their affiliated group.

- Data submission by the affiliated group won't override performance category reweighting for the subgroup.
- Data submission by the subgroup won't override performance category reweighting for the affiliated group.

Clinicians who register to report an MVP as a subgroup can request performance category reweighting at the subgroup level by contacting the QPP Service Center.

- Subgroups *won't* be able to submit a MIPS EUC Exception application as outlined in this guide.

A subgroup's request for reweighting will be superseded by any reweighting approved for their affiliated group.

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content:

Clinicians who register to report an MVP as a subgroup will inherit the performance category reweighting approved for their affiliated group.

- Data submission by the affiliated group won't override performance category reweighting for the subgroup.
- Data submission by the subgroup won't override performance category reweighting for the affiliated group, *it will only override performance category reweighting for the subgroup.*
- Subgroups *can't* submit a MIPS EUC Exception application as outlined in this guide.

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Change #8

Location:

2023 – Page 12

2024 – Page 12

Reason for Change:

Updated based on policy changes for the 2024 performance year.

2023 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

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

- Medicare Shared Saving Program
- Vermont Medicare ACO Model
- Bundled Payments for Care Improvement (BPCI) Advanced Model
- Enhanced Oncology Model (EOM)
- Maryland Total Cost of Care
- *Independence at Home Demonstration*
- Primary Care First (PCF)
- Value in Opioid Use Disorder Treatment (ViT)
- ACO Realizing Equity Access and Community Health (REACH) Model
- Comprehensive Care for Joint Replacement (CJR) Payment
- Kidney Care Choices (KCC)

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

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

- ACO Realizing Equity Access and Community Health (ACO REACH)
- *Advancing All-Payer Health Equity Approaches and Development (AHEAD) Model**
- Bundled Payments for Care Improvement (BPCI) Advanced Model
- Comprehensive Care for Joint Replacement (CJR) Payment Model
- Enhancing Oncology Model (EOM)
- *Guiding an Improved Dementia Experience (GUIDE) Model*
- Kidney Care Choices (KCC)
- *Making Care Primary (MCP)*
- Maryland Total Cost of Care Model
- Medicare Shared Savings Program
- Primary Care First (PCF)
- *States AHEAD Model - Hospital Track**
- Value in Opioid Use Disorder Treatment (ViT)
- Vermont Medicare ACO Model

**State-by-state determination.*

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Change #9:

Location:

2023 – Page 16

2024 – Page 16

Reason for Change:

Updated title of linked document to align with current performance year.

2023 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Frequently Asked Questions

Content: 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 *2023 MIPS Data Validation Criteria Guide (ZIP)* for information on the data validation and audit process.

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Frequently Asked Questions

Content: 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 *2024 MIPS Data Validation Criteria Guide (ZIP, 2MB)* for information on the data validation and audit process.

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Change #10:

Location:

2023 – Page 22

2024 – Page 22

Reason for Change:

Updated to align with current policy.

2023 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Application Steps

Content: Note: If reporting an MVP with a subgroup, you *must contact the QPP Service Center to request an Extreme and Uncontrollable Circumstances Exception application.*

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Application Steps

Content: Note: If reporting an MVP with a subgroup, you *will inherit any reweighting approved for your affiliated group. Subgroups can't request reweighting independent of their affiliated group's status.*

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Change #11:

Location:

2023 – Page 26

2024 – Page 26

Reason for Change:

Updated to align with current policy.

2023 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Application Steps

Content: N/A

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Application Steps

Content: *Note: The 2019 COVID-19 PHE ended on May 11, 2023. We're no longer accepting applications due to COVID-19 for the 2024 performance year.*

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Change #12:

Location:

2023 – N/A

2024 – Page 27

Reason for Change:

Updated to align with current policy.

2023 Final Document text:

Section: N/A

Content: N/A

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Application Steps

Content: *Step 8: Enter the Extreme and Uncontrollable Circumstances Event Type Cont.*

Applications due to the Change Healthcare Cyberattack in late February should include "Ransom/Malware" as the Event Type. Once selected, confirm that the ransom/malware event pertained to the Change Healthcare Cyberattack.

Note: A Cybersecurity incident affecting Change Healthcare occurred in late February 2024, impacting healthcare operations around the country.

**The screenshots included in this user guide were based on the QPP test environment. Because we are always working to incorporate feedback and improve the experience, there may be differences between these screenshots and what you see on the QPP website.*

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Change #13:

Location:

2023 – Page 27

2024 – Page 28

Reason for Change:

Updated title of linked document to align with current performance year.

2023 Final Document text:

Section: Extreme and Uncontrollable Circumstances Exception Application Process: Application Steps

Content:

See our 2023 MIPS Data Validation Criteria for information on the data validation and audit process.

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Process: Application Steps

Content:

See our 2024 MIPS Data Validation Criteria for information on the data validation and audit process.

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Change #14:

Location:

2023 – Page 35

2024 – Page 36

Reason for Change:

Updated dates for new performance year.

2023 Final Document text:

Section: Appendices

Content: 2023 Performance Year MIPS Performance Category Weight Redistribution Policies for Individual Clinicians, Groups, Virtual Groups, and APM Entities Reporting Traditional MIPS or MVPs

The table below illustrates the 2023 performance category weights and reweighting policies that CMS will apply to clinicians, groups, and virtual groups reporting traditional MIPS or MVPs. (Small practices should refer to Appendix A2.)

2024 Final Document text:

Section: Appendices

Content: 2024 Performance Year MIPS Performance Category Weight Redistribution Policies for Individual Clinicians, Groups, Virtual Groups, and APM Entities Reporting Traditional MIPS or MVPs

The table below illustrates the 2024 performance category weights and reweighting policies that CMS will apply to clinicians, groups, and virtual groups reporting traditional MIPS or MVPs. (Small practices should refer to Appendix A2.)

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Change #15:

Location:

2023 – Page 36

2024 – Page 37

Reason for Change:

Updated dates for new performance year.

2023 Final Document text:

Section: Appendices

Content: 2023 Performance Year MIPS Performance Category Weight Redistribution Policies for Individual Clinicians, Groups, Virtual Groups, and APM Entities Reporting Traditional MIPS or MVPs (Continued)

2024 Final Document text:

Section: Appendices

Content: 2024 Performance Year MIPS Performance Category Weight Redistribution Policies for Individual Clinicians, Groups, Virtual Groups, and APM Entities Reporting Traditional MIPS or MVPs (Continued)

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Change #16:

Location:

2023 – Page 37

2024 – Page 38

Reason for Change:

Updated dates for new performance year.

2023 Final Document text:

Section: Appendices

Content: MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2023 Performance Year: Small Practices
The table below illustrates the 2023 performance category weights and reweighting policies that CMS will apply to small practices.

2024 Final Document text:

Section: Appendices

Content: MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2024 Performance Year: Small Practices
The table below illustrates the 2024 performance category weights and reweighting policies that CMS will apply to small practices.

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Change #17:

Location:

2023 – Page 38

2024 – Page 39

Reason for Change:

Updated dates for new performance year and add clarifying language on payment adjustments.

2023 Final Document text:

Section: Appendices

Content: MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2024 Performance Year: Small Practices (Continued)

Note: If you have multiple performance categories reweighted to 0% so that a single performance category is weighted at 100% of your final score, you'll receive a score equal to the performance threshold regardless of any data submitted *or not submitted*. See next slide for additional information.

2024 Final Document text:

Section: Appendices

Content: MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2024 Performance Year: Small Practices (Continued)

Note: If you have multiple performance categories reweighted to 0% so that a single performance category is weighted at 100% of your final score, you'll receive a score equal to the performance threshold regardless of any data submitted and *you'll receive a neutral payment adjustment*.

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Change #18:

Location:

2023 – Page 39

2024 – Page 40

Reason for Change:

Updated dates for new performance year.

2023 Final Document text:

Section: Appendices

Content: 2023 Performance Year MIPS Performance Category Weight Redistribution Policies for APM Entities and APM Participants Reporting the APP

The table below illustrates the 2023 performance category weights and reweighting policies that CMS will apply to APM Entities reporting traditional MIPS or MVPs and to individual clinicians, groups and APM Entities reporting via the APP.

2024 Final Document text:

Section: Appendices

Content: 2024 Performance Year MIPS Performance Category Weight Redistribution Policies for APM Entities and APM Participants Reporting the APP

The table below illustrates the 2024 performance category weights and reweighting policies that CMS will apply to APM Entities reporting traditional MIPS or MVPs and to individual clinicians, groups and APM Entities reporting via the APP.