

# MIPS Promoting Interoperability Performance Category Hardship Exception Application Guide

## 2022 Final Document versus 2023 Final Document

**Burden impact:** The changes in this guide don't reflect policies in the CY 2024 Physician Fee Scheduled (PFS) final 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:

2022 – Page 1

2023 – Page 1

#### Reason for Change:

Alignment with current program year

#### 2022 Final Document text:

**Title:** 2022 MIPS Promoting Interoperability Performance Category Hardship Exception Application Guide

#### 2023 Final Document text:

**Title:** 2023 MIPS Promoting Interoperability Performance Category Hardship Exception Application Guide

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### Change #2:

#### Location:

2022 – Page 2

2023 – Page 2

#### Reason for Change:

Removed part of section title

#### 2022 Final Document text:

**Section:** Table of Contents

**Content:** *MIPS Promoting Interoperability Performance Category Hardship Exception Information for Individuals, Groups and Virtual Groups*

#### 2023 Final Document text:

**Section:** Table of Contents

**Content:** *MIPS Promoting Interoperability Performance Category Hardship Exception Information*

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### Change #3:

#### Location:

2022 – Page 2

2023 – Page 2

#### Reason for Change:

Removed section with additional resources and glossary therefore the table of contents was updated.

**2022 Final Document text:**

**Section:** Table of Contents

**Content:** *Help, Resources, Glossary, and Version History*

**2023 Final Document text:**

**Section:** Table of Contents

**Content:** *Help and Version History*

.....  
**Change #4:**

**Location:**

2022 – Page 4

2023 – Page 2

**Reason for Change:**

Moved location of document purpose to table of contents page, no change to purpose.

**2022 Final Document text:**

**Section:** How to Use This Guide

**Content:** Purpose: This guide will provide general information about the MIPS Promoting Interoperability Performance Category Hardship Exception application and provide step-by-step instructions on how to complete the application.

**2023 Final Document text:**

**Section:** Table of Contents

**Content:** Purpose: This guide will provide general information about the MIPS Promoting Interoperability Performance Category Hardship Exception application and provide step-by-step instructions on how to complete the application.

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**Change #5:**

**Location:**

2022 – Page 6

2023 – Page 6

**Reason for Change:**

Updated to account for program changes.

**2022 Final Document text:**

**Section:** Overview

**Content:** Who

Individual clinicians, groups, and virtual groups reporting via traditional MIPS or the APM Performance Pathway (APP).

- Third party intermediaries can submit an application with permission from the clinician or practice.

Some clinicians, groups and virtual groups automatically qualify for reweighting of the Promoting Interoperability performance category. If you qualify for automatic reweighting, you don't need to apply for a MIPS Promoting Interoperability Hardship

Exception.

- See Appendix A for information about the clinicians, groups, and virtual groups that automatically qualify for reweighting of this performance category.

**2023 Final Document text:**

**Section:** Overview

**Content:** Who

Individual clinicians, groups, and virtual groups reporting via traditional MIPS, *MIPS Value Pathways (MVPs)* or the APM Performance Pathway (APP).

- Third party intermediaries can submit an application with permission from the clinician or practice.

Some clinicians, groups and virtual groups automatically qualify for reweighting of the Promoting Interoperability performance category. If you qualify for automatic reweighting, you don't need to apply for a MIPS Promoting Interoperability Hardship Exception.

- See Appendix A for information about the clinicians, groups, and virtual groups that automatically qualify for reweighting of this performance category.

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**Change #6:**

**Location:**

2022 – Page 6

2023 – Page 6

**Reason for Change:**

Updated dates for new year

**2022 Final Document text:**

**Section:** Overview

**Content:** When

*Now through January 3, 2023, at 8 p.m. ET.*

**2023 Final Document text:**

**Section:** Overview

**Content:** When

*The Promoting Interoperability Hardship Exception application will close at 8 p.m. ET on January 2, 2024.*

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**Change #7:**

**Location:**

2022 – Page 7

2023 – Page 7

**Reason for Change:**

Updated section break title in alignment with changes to table of contents

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information for Individuals, Groups and Virtual Groups

**Content:** MIPS Promoting Interoperability Performance Category Hardship Exception Information *for Individuals, Groups and Virtual Groups*

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information

**Content:** *MIPS Promoting Interoperability Performance Category Hardship Exception Information*

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**Change #8:**

**Location:**

2022 – Page 8

2023 – Page 8

**Reason for Change:**

Updated because the policy was no longer new.

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information for Individuals, Groups and Virtual Groups

**Content:** *New:* Small practices *now* qualify for automatic reweighting.

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information

**Content:** *Reminder:* Small practices qualify for automatic reweighting.

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**Change #9**

**Location:**

2022 – Page 8

2023 – Page 8

**Reason for Change:**

Updated to account for new policy.

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information for Individuals, Groups and Virtual Groups

**Content:** You will complete the hardship exception application at the level for which you will report data to MIPS.

- If you are reporting data at the individual level, complete the hardship exception application at the individual level.
- If you are reporting data at the group level, complete the hardship exception application at the group level.
- Note, a group hardship exception application will only apply at the group level.

- If your practice is participating in MIPS at the individual level, don't complete the hardship exception application at the group level. You will complete the hardship exception application at the individual level for each clinician (who doesn't automatically qualify for reweighting) to be considered for reweighting.

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information

**Content:** You will complete the hardship exception application at the level for which you will report data to MIPS.

- If you are reporting data at the individual level, complete the hardship exception application at the individual level.
- If you are reporting data at the group level, complete the hardship exception application at the group level.
- Note, a group hardship exception application will only apply at the group level.
  - If your practice is participating in MIPS at the individual level, don't complete the hardship exception application at the group level. You will complete the hardship exception application at the individual level for each clinician (who doesn't automatically qualify for reweighting) to be considered for reweighting.
  - *If you're reporting as an MVP as a subgroup, the group level Hardship Exception will apply to the subgroup participants.*

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**Change #10:**

**Location:**

2022 – Page 8

2023 – Page 8

**Reason for Change:**

Updated because the policy was no longer new.

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information for Individuals, Groups and Virtual Groups

**Content:** *Starting with performance year 2022*, small practices qualify for automatic reweighting of the Promoting Interoperability performance category.

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information

**Content:** Small practices qualify for automatic reweighting of the Promoting Interoperability performance category.

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**Change #11:**

**Location:**

2022 – Page 8

**Reason for Change:**

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

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information for Individuals, Groups and Virtual Groups

**Content:**

You aren't required to submit documentation with your application.

- However, clinicians, groups, and virtual groups should retain documentation of their circumstances supporting their application for their own records in the event they're selected by CMS for data validation or audit. See our *2022 MIPS Data Validation Criteria (ZIP)* for details on the data validation process.

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information

**Content:**

You aren't required to submit documentation with your application.

- However, clinicians, groups, and virtual groups should retain documentation of their circumstances supporting their application for their own records in the event they're selected by CMS for data validation or audit. See our *2023 MIPS Data Validation Criteria (ZIP)* for details on the data validation process.



**Change #12:**

**Location:**

2022 – Page 9

2023 – Page 9

**Reason for Change:**

Updated to align with current performance year.

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information for Individuals, Groups and Virtual Groups

**Content:** You may still be able to report if your electronic health record (EHR) product is decertified during the *2022* performance year.

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information

**Content:** You may still be able to report if your electronic health record (EHR) product is decertified during the *2023* performance year.



**Change #13:**

**Location:**

2022 – Page 11

2023 – Page 11

**Reason for Change:**

Acronym previously spelled out.

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information for Individuals, Groups and Virtual Groups

**Content:** A MIPS Promoting Interoperability performance category hardship exception doesn't exempt you from reporting on any *certified EHR technology* (CEHRT) activities required for participation in your APM.

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception Information

**Content:** A MIPS Promoting Interoperability performance category hardship exception doesn't exempt you from reporting on any CEHRT activities required for participation in your APM.

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**Change #14:**

**Location:**

2022 – Page 13

2023 – Page 13

**Reason for Change:**

Added new option for contacting the QPP service center and rearranged order of contact options.

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception: Frequently Asked Questions

**Content:**

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).

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception: Frequently Asked Questions

**Content:**

If you identified an error with your exception application, please contact the Quality Payment Program *Service Center* by email at [QPP@cms.hhs.gov](mailto:QPP@cms.hhs.gov), *create a QPP Service Center ticket*, or by phone at 1-866-288-8292 (Monday – Friday, 8 a.m. - 8 p.m. ET).

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**Change #15:**

**Location:**

2022 – Page 15 (repeats on every page through page 29)

2023 – Page 15 (repeats on every page through page 29)

**Reason for Change:**

Updated screenshot disclaimer to replace the URL with “QPP website” in alignment with current style guide preferences.

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception: Application Steps

**Content:** \*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).

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception: Application Steps

**Content:** \*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 the [QPP website](http://QPP website).

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**Change #16:**

**Location:**

2022 – Page 16

2023 – Page 16

**Reason for Change:**

Updated deadline.

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception: Application Steps

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

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception: Application Steps

**Content:** You can create and submit a new exception request until 8 p.m. ET on January 2, 2024.

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**Change #17:**

**Location:**

2022 – Page 16



**Reason for Change:**

Updated title of linked resource to account for new year.

**2022 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception: Application Steps

**Content:** 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 case you are selected by CMS for data validation or an audit. See our *2022 MIPS Data Validation Criteria Guide (ZIP)* for details on the data validation process.

**2023 Final Document text:**

**Section:** MIPS Promoting Interoperability Performance Category Hardship Exception: Application Steps

**Content:** 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 case you are selected by CMS for data validation or an audit. See our *2023 MIPS Data Validation Criteria Guide (ZIP)* for details on the data validation process.

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**Change #18:**

**Location:**

2022 – Page 30

2023 – Page 30

**Reason for Change:**

Updated section break title in alignment with changes to table of contents.

**2022 Final Document text:**

**Section:** Help, Resources, Glossary, and Version History

**Content:** Help, *Resources*, *Glossary*, and Version History

**2023 Final Document text:**

**Section:** Help and Version History

**Content:** Help and Version History

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**Change #19:**

**Location:**

2022 – Page 31

2023 – Page 31

**Reason for Change:**

Updated service center contact information to account for a new contact option and revisions to standardized language.

**2022 Final Document text:**

**Section:** Help, Resources, Glossary, and Version History

**Content:** 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

**2023 Final Document text:**

**Section:** Help and Version History

**Content:** Contact the Quality Payment Program Service Center by email at [QPP@cms.hhs.gov](mailto:QPP@cms.hhs.gov), create a [QPP Service Center ticket](#), or by phone at 1-866-288-8292 (Monday through Friday, 8 a.m. - 8 p.m. ET).

- People who are deaf or hard of hearing can dial 711 to be connected to a TRS Communications Assistant.

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**Change #20:**

**Location:**

2022 – Page 32

2023 – N/A

**Reason for Change:**

Additional resources section deemed superfluous as links to these resources are included earlier in the document. (Standardized change across all resources.)

**2022 Final Document text:**

**Section:** Help, Resources, Glossary, and Version History

**Content:** Additional Resources

The QPP 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.

- 2022 MIPS Promoting Interoperability Quick Start Guide (PDF)
- 2022 MIPS Promoting Interoperability User Guide (PDF)
- 2022 Extreme and Uncontrollable Circumstances Exception Application Guide

**2023 Final Document text:** N/A

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**Change #21:**

**Location:**

2022 – Page 34

2023 – Page 33

**Reason for Change:**

Updated section title for grammar

**2022 Final Document text:**

**Section:** Appendix

**Content:** Appendix

**2023 Final Document text:**

**Section:** Appendices

**Content:** Appendices

.....  
**Change #22:**

**Location:**

2022 – Page 35

2023 – Page 34

**Reason for Change:**

Updated information to align with program changes.

**2022 Final Document text:**

**Section:** Appendix

**Content:**

**You have one of these Special Statuses:**

- (New) Small Practice;
- Ambulatory Surgical Center (ASC)-based;
- Hospital-based; or
- Non-patient facing

**You are one of these clinician types:**

- (New) Clinical social worker
- *Physician assistant*
- *Nurse practitioner*
- *Clinical nurse specialist*
- *Certified registered nurse anesthetist*
- Physical therapist
- Occupational therapist
- Qualified speech-language pathologist
- Qualified audiologist
- Clinical psychologist
- Registered dietitian or nutrition professional

**2023 Final Document text:**

**Section:** Appendices

**Content:**

**You have one of these Special Statuses:**

- Small Practice;
- Ambulatory Surgical Center (ASC)-based;
- Hospital-based; or
- Non-patient facing

**You are one of these clinician types:**

- Clinical social worker
- Physical therapist
- Occupational therapist
- Qualified speech-language pathologist
- Qualified audiologist
- Clinical psychologist
- Registered dietitian or nutrition professional

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**Change #23:**

**Location:**

2022 – Page 36

2023 – Page 35

**Reason for Change:**

Updated title and performance year references to align with current performance year.

**2022 Final Document text:**

**Section:** Appendix

**Content:**

**Appendix B. MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2022 Performance Year: Individual Clinicians, Groups and Virtual Groups**

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

**Important Reminders:**

Individual Clinicians, Groups, Virtual Groups: 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.

**2023 Final Document text:**

**Section:** Appendices

**Content:**

**Appendix B. MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2023 Performance Year: Individual Clinicians, Groups and Virtual Groups**

The table below illustrates the 2023 performance category weights and reweighting policies that CMS will apply to clinicians, groups, and virtual groups reporting via traditional MIPS.

**Important Reminders:**

Individual Clinicians, Groups, Virtual Groups: 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 2025 payment year.

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**Change #24:**

**Location:**

2022 – Page 36

2023 – Page 35

**Reason for Change:**

Updated reference to later appendix (added a new appendix C in 2023)

**2022 Final Document text:**

**Section:** Appendix

**Content:** Refer to Appendix C for reweighting policies that apply to APM Entities.

**2023 Final Document text:**

**Section:** Appendices

**Content:** Refer to Appendix D for reweighting policies that apply to APM Entities.

.....  
**Change #25:**

**Location:**

2022 – Page 39

2023 – Page 40

**Reason for Change:**

Updated appendix title and copy for new performance year.

**2022 Final Document text:**

**Section:** Appendix

**Content:**

**Appendix C. MIPS Performance Category Weight Redistribution Policies for APM Entities and the APP Finalized for the 2022 Performance Year**

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

**2023 Final Document text:**

**Section:** Appendices

**Content:**

**Appendix D. MIPS Performance Category Weight Redistribution Policies for APM Entities and the APP Finalized for the 2023 Performance Year**

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