EXHIBIT A

HOSPITAL OUTPATIENT QUALITY REPORTING PROGRAM (0938-1109)
CY 2026 OPPS/ASC PROPOSED RULE CHANGE CROSSWALK

REGULATIONS	CHANGES TO REGULATIONS/GUIDANCE	EXPLANATION
§419.46 Requirements under the Hospital Outpatient Quality Reporting (OQR) Program. (e) Exception. CMS may grant an exception to one or more data submission deadlines and requirements in the event of extraordinary circumstances beyond the control of the hospital, such as when an act of nature affects an entire region or locale or a systemic problem with one of CMS' data collection systems directly or indirectly affects data submission. CMS may grant an exception as follows: (1) Upon request by the hospital. Specific requirements for submission of a request for an exception are available on the CMS website. (2) At the discretion of CMS. CMS may grant exceptions to hospitals that have not requested them when CMS determines that an extraordinary circumstance has occurred.	**§419.46 Requirements under the Hospital Outpatient Quality Reporting (OQR) Program.** (e) Extraordinary circumstance exception (ECE). (1) General rule. CMS may grant an ECE with respect to the reporting requirements under this section in the event of extraordinary circumstances beyond the control of the hospital. For purposes of this paragraph (e), an extraordinary circumstance is an event beyond the control of a hospital (for example, a natural or man-made disaster such as a hurricane, tornado, earthquake, terrorist attack, or bombing) that affected the ability of the hospital to comply with one or more applicable reporting requirements with respect to a calendar year. (2) Process for requesting an ECE. (i) A hospital may request an ECE within 30 calendar days of the date that the extraordinary circumstance occurred by submitting the information specified by CMS at QualityNet or a successor website. (ii) CMS notifies the hospital of its decision on the request, in writing, via email. In the event that CMS grants an ECE to the hospital, the written decision specifies whether the hospital is exempted from one or more reporting requirements or whether CMS has granted the hospital an extension of time to comply with one or more reporting requirements. (3) Authority to Grant an ECE. CMS may grant an ECE to one or more hospitals that have not requested an ECE if CMS determines that— (i) A systemic problem with a CMS data collection system directly impacted the ability of the hospital to comply with a quality data reporting requirement; or (ii) An extraordinary circumstance has affected an entire region or locale. Any ECE granted under this paragraph (e)(3) specifies whether the affected hospitals are exempted from one or more reporting requirements or whether CMS has granted the hospitals an extension of time to comply with one or more reporting requirements.	Updated the extraordinary circumstance exception policy to clarify that CMS has the discretion to grant an extension as a form of ECE relief (in addition to exceptions).