

Merit-based Incentive Payment System (MIPS)

2023 Extreme and Uncontrollable Circumstances Exception Application Guide



Quality Payment
PROGRAM

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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.



How to Use This Guide





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.

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Hyperlinks

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

MIPS Extreme and Uncontrollable Circumstances Exception Application Overview



UPDATED MARCH 2024

In response to the Change Healthcare cyberattack in late February, the Centers for Medicare & Medicaid Services (CMS) extended the 2023 Merit-based Incentive Payment System (MIPS) data submission deadline and is reopening the 2023 MIPS Extreme and Uncontrollable Circumstances (EUC) Exception Application to provide relief to clinicians affected by this cybersecurity incident. The applications will be open for the remainder of the data submission period, which closes April 15, 2024.

For more information, view the *CMS Announces Reopening of 2023 MIPS EUC Application in Response to Change Healthcare Cyberattack* listserv message posted on the QPP Resource Library.



MIPS Extreme and Uncontrollable Circumstances Exception 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.

What	The MIPS Extreme and Uncontrollable Circumstances (EUC) Exception application allows you to request reweighting for one or more performance categories to 0%. See Appendix A1, Appendix A2, and Appendix B for more information on performance category reweighting in traditional MIPS, MIPS Value Pathways (MVPs) and the APM Performance Pathway (APP).
Who	Individual clinicians, groups, virtual groups, and APM Entities • Third party intermediaries can submit an application with permission from the clinician or practice. 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.
Why	You can submit an application to have your MIPS quality, cost, improvement activities, and/or Promoting Interoperability performance categories reweighted to 0% if: • You experience an extreme and uncontrollable circumstance outside of your control, such as a natural disaster, ransomware attack or public health emergency (PHE), that prevents you from collecting data for an extended period of time, or that could impact your performance on cost measures. Note: APM Entities are required to request reweighting for all performance categories.
When	The MIPS EUC Exception application will close at 8 p.m. ET on January 2, 2024.
Where	Sign in to the Quality Payment Program (QPP) website with your HCQIS Access and Roles Profile (HARP) account. 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 Register for a HARP Account document in the QPP Access User Guide (ZIP). Note: 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 QPP Access User Guide (ZIP) for more information on requesting the Security Official role.
How	1. Register for a HARP account 2. Sign in to the QPP website 3. Select 'Exceptions Applications' on the left-hand navigation 4. Select 'Add New Exception' 5. Select 'Extreme and Uncontrollable Circumstances Exception' 6. Complete the application for individual, group, virtual group, or APM Entity participation



MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Policies for Individual Clinicians, Groups, and Virtual Groups

MIPS EUC Exception applications can be submitted for one or more performance categories. 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 2023 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2025.

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 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 of Promoting Interoperability, review the [2023 Promoting Interoperability Quick Start Guide \(PDF\)](#).



MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

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

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

Example

Scenario	Outcome
A MIPS eligible clinician who is eligible for the automatic MIPS EUC policy has also submitted an MIPS 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.	You'll be scored as follows: • The quality and improvement activities performance categories will be scored because you submitted data for those categories • The cost performance category is reweighted to 0% under the automatic EUC policy. • The Promoting Interoperability performance category is also reweighted to 0% under the automatic EUC policy. Note, in this example, the MIPS EUC Exception application wasn't needed to reweight the Promoting Interoperability performance category due to the automatic MIPS EUC policy.

MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Individual Clinicians, Groups, and Virtual Groups Reporting Traditional MIPS / Individual Clinicians and Groups Reporting an MVP

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

Example

Scenario	Outcome
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.	You'll receive a MIPS final score based on the data submitted. • The improvement activities performance category will be weighted at 15%. • The Promoting Interoperability performance category will be weighted at 85%. • The quality performance category will retain a 0% weight because you didn't submit quality data. • 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).



MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Individual Clinicians and Groups Reporting the APP

Example

Scenario	Outcome
You're a MIPS eligible clinician (or group) planning to report the APP . You submit an application to reweight the quality performance category and your application was approved.	You'll receive a MIPS final score based on the data submitted. • The improvement activities performance category will be weighted to 25%. • The Promoting Interoperability performance category will be weighted to 75%. • The quality performance category will be weighted at 0% provided no data is submitted. • The cost performance category will retain a 0% weight (because cost isn't scored under the APP).

MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Policies for Subgroups Reporting an MVP

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.



MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Policies for APM Entities

APM Entities

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)



MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Policies for 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 Exception 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.



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



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

How Does CMS Assess MIPS EUC Exception 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.

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'll receive a notice of our decision and the status of your application will be reflected in your QPP Account on the [QPP website](#).

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

- You can monitor your application status in your QPP Account on the [QPP website](#).



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

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 [2023 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 Service Center by email at 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).

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 HARP credentials in order to see the application on the [QPP website](#).

Important Note: Corrections can't be made after the application period has closed.



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

Can we submit one MIPS EUC Exception application at the group level rather than separate applications for each individually eligible clinician?

- Yes, you can submit a group-level application instead of separate applications for each clinician if the EUC applies to the whole group. However, if the circumstances are specific to a subset of clinicians in the group, you'd need to submit individual applications for each of those clinicians.

Our third party intermediary experienced issues and is unable to submit data on our behalf. Can we submit an EUC Exception application for this issue?

- As noted in the [Calendar Year 2018 Quality Payment Program Final Rule](#), extreme and uncontrollable circumstances, such as natural disasters, may affect a clinician's ability to access or submit quality measures via all submission mechanisms (effectively rendering the measures unavailable to the clinician), as well as the availability of numerous improvement activities. In addition, damage to a facility where care is provided due to a natural disaster, such as a hurricane, could result in practice management and clinical systems that are used for the collection or submission of data to be down, thus impacting a clinician's ability to submit necessary information via Qualified Registry, QCDR, CMS Web Interface, or claims.
- This policy doesn't include issues that third party intermediaries, such as Electronic Health Record vendors (EHRs), QCDRs, or Qualified Registries, might have submitting information to MIPS on behalf of a MIPS eligible clinician.
- Instead, this policy is geared towards events, such as natural disasters, that affect the MIPS eligible clinician's ability to submit data to the third party intermediary, which in turn, could affect the ability of the clinician (or the third party intermediary acting on their behalf) to successfully submit measures and activities to MIPS.

MIPS Extreme and Uncontrollable Circumstances Exception Application Process: Application Steps



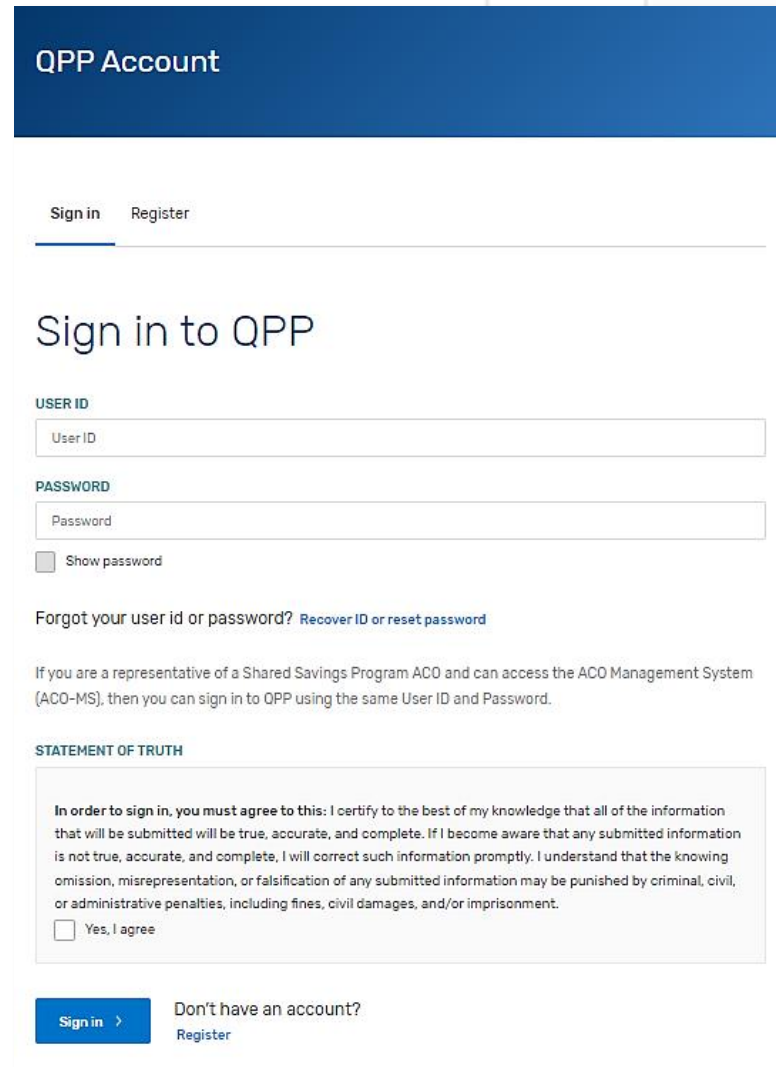
MIPS Extreme and Uncontrollable Circumstances Exception Application Process: Application Steps

Step 1: Sign in to Your QPP Account

With your HARP credentials, sign in to your QPP Account **on the [QPP website](#)**.

Note: If you haven't signed in on the [QPP website](#) before, you must register for an account to obtain your HARP credentials.

*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](#).



The screenshot shows the 'QPP Account' sign-in interface. At the top, there's a blue header with 'QPP Account'. Below it, a navigation bar has 'Sign in' (active) and 'Register'. The main heading is 'Sign in to QPP'. There are two input fields: 'USER ID' and 'PASSWORD'. Below the password field is a 'Show password' checkbox. A link 'Forgot your user id or password? Recover ID or reset password' is provided. A paragraph explains that ACO representatives can use ACO-MS credentials. A 'STATEMENT OF TRUTH' section contains a long text block about certifying information and a 'Yes, I agree' checkbox. At the bottom, there's a blue 'Sign in >' button and a link 'Don't have an account? Register'.

QPP Account

Sign in Register

Sign in to QPP

USER ID

User ID

PASSWORD

Password

☐ Show password

Forgot your user id or password? [Recover ID or reset password](#)

If you are a representative of a Shared Savings Program ACO and can access the ACO Management System (ACO-MS), then you can sign in to QPP using the same User ID and Password.

STATEMENT OF TRUTH

In order to sign in, you must agree to this: I certify to the best of my knowledge that all of the information that will be submitted will be true, accurate, and complete. If I become aware that any submitted information is not true, accurate, and complete, I will correct such information promptly. I understand that the knowing omission, misrepresentation, or falsification of any submitted information may be punished by criminal, civil, or administrative penalties, including fines, civil damages, and/or imprisonment.

☐ Yes, I agree

[Sign in >](#) Don't have an account? [Register](#)



MIPS Extreme and Uncontrollable Circumstances Exception Application Process: Application Steps

Step 2: Navigate to Your Exception Applications

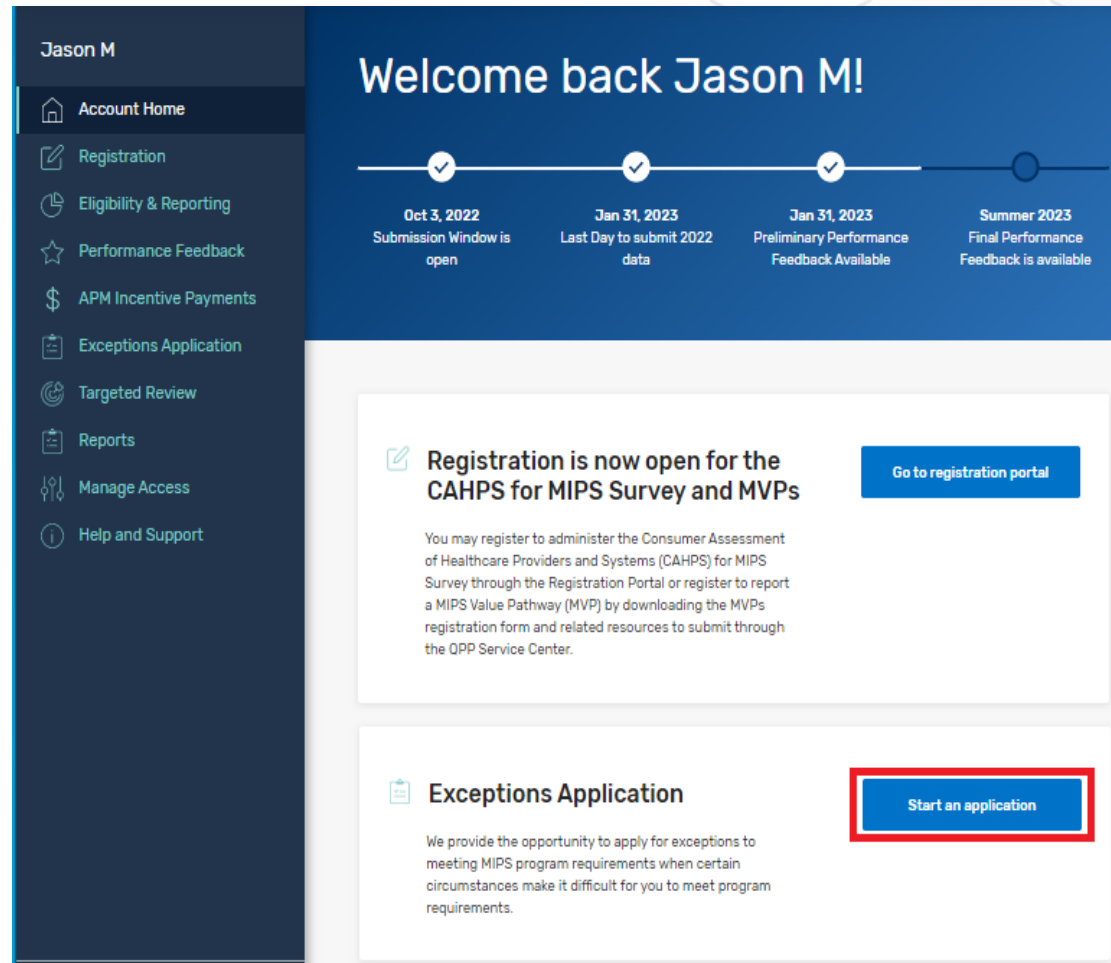
Once you're signed into your account, select:

- 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.

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MIPS Extreme and Uncontrollable Circumstances Exception Application Process: Application Steps

Step 3: Select Extreme and Uncontrollable Circumstances Exception

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

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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 >



MIPS Extreme and Uncontrollable Circumstances Exception Application Process: Application Steps

Step 4: Select Application Type

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

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

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The screenshot shows a web form titled "Add New Extreme and Uncontrollable Circumstances Application". It features a back arrow on the left. The form has two main sections. The first section is labeled "Application Type: * ?" and contains four radio button options: "Individual" (which is selected), "Group", "Virtual Group", and "APM Entity". The second section is labeled "Clinician NPI * ?" and contains a text input field with the placeholder text "e.g. 1234567890". At the bottom of the form, there are three buttons: "CANCEL", "SAVE", and "SAVE & CONTINUE >".

MIPS Extreme and Uncontrollable Circumstances Exception 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	- National Provider Identifier (NPI) - Practice Affiliation
Group	Taxpayer Identification Number (TIN)
Virtual Group	Virtual Group Identifier
APM Entity	APM Entity ID

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 2023 QPP EXCEPTION ID: 8521 [VIEW/ADD COMMENTS](#) | ✓ All changes saved [SAVE & CLOSE](#)

EUC Application - BD (E&UC: Individual)

Individual Details

Clinician NPI	Clinician's Name	Clinician Type
0839723588 Change	Brenda Drerenberger	Doctor of Medicine

Group Practice Name * [?](#)

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

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MIPS Extreme and Uncontrollable Circumstances Exception 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 application interface for entering submitter details. At the top, there is a header bar with the text "PY 2023 QPP EXCEPTION ID: 8521" and a link "VIEW/ADD COMMENTS". Below this, the title "EUC Application - BD (E&UC: Individual)" is displayed, followed by a status indicator "All changes saved" and a "SAVE & CLOSE" button. The main section is titled "Submitter Details". It contains three fields: "Contact Phone Number" with a sub-field for "Phone Number" (866-288-8292) and an "Ext. (Optional)" field; "Contact Email Address" with a sub-field for "Email" (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 / QCDR", "EHR Vendor", and "Other".

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MIPS Extreme and Uncontrollable Circumstances Exception 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 the [QPP website](#) and access the application.

PY 2023 QPP EXCEPTION ID: 8521 [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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MIPS Extreme and Uncontrollable Circumstances Exception 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**.

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The screenshot shows a web form titled "PY 2023 QPP EXCEPTION ID: 8521" with a "VIEW/ADD COMMENTS" link. Below the title is "EUC Application - BD (E&UC: Individual)" with edit and download icons, and a status "All changes saved". A "SAVE & CLOSE" button is in the top right. The main section is "Extreme and Uncontrollable Circumstances Details". It contains three sections: "Event Type" with radio buttons for COVID-19, Natural Disaster, Ransom / Malware, Medical Issue, and Other; "Event Date Range" with "Start Date" and "End Date" fields, a "To" separator, and an "Event Still Persists" checkbox; and "Event Description" with a text area and a "6000 characters remaining" indicator.

PY 2023 QPP EXCEPTION ID: 8521 [VIEW/ADD COMMENTS](#) | ✓ All changes saved [SAVE & CLOSE](#)

EUC Application - BD (E&UC: Individual)

Extreme and Uncontrollable Circumstances Details

Event Type

☐ COVID-19

☐ Natural Disaster

☐ Ransom / Malware

☐ Medical Issue

☐ Other

Event Date Range

Start Date To End Date

☐ Event Still Persists

Event Description

Enter a brief description of the event

6000 characters remaining



MIPS Extreme and Uncontrollable Circumstances Exception 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 2023 performance data will be impacted.



The screenshot shows a web form 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're selected by CMS for data validation or an audit.

See our [2023 MIPS Data Validation Criteria](#) for information on the data validation and audit process.

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MIPS Extreme and Uncontrollable Circumstances Exception Application Process: Application Steps

Step 10: Select MIPS Performance Categories

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

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

The screenshot shows a web interface for selecting MIPS performance categories. At the top, it says "Performance Categories Affected" with a red asterisk and a question mark icon. Below this, there are four categories, each with a checkbox and a description:

- ☒ **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.**

At the bottom right, there are two buttons: "WITHDRAW" in red text and "SUBMIT FOR REVIEW" in white text on a teal button with a right arrow.

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MIPS Extreme and Uncontrollable Circumstances Exception Application Process: Application Steps

Step 11: Submit Extreme and Uncontrollable Circumstances Application

Once you're done with your application, review the disclosures, then select the **Certify & Submit** button.

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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

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 >

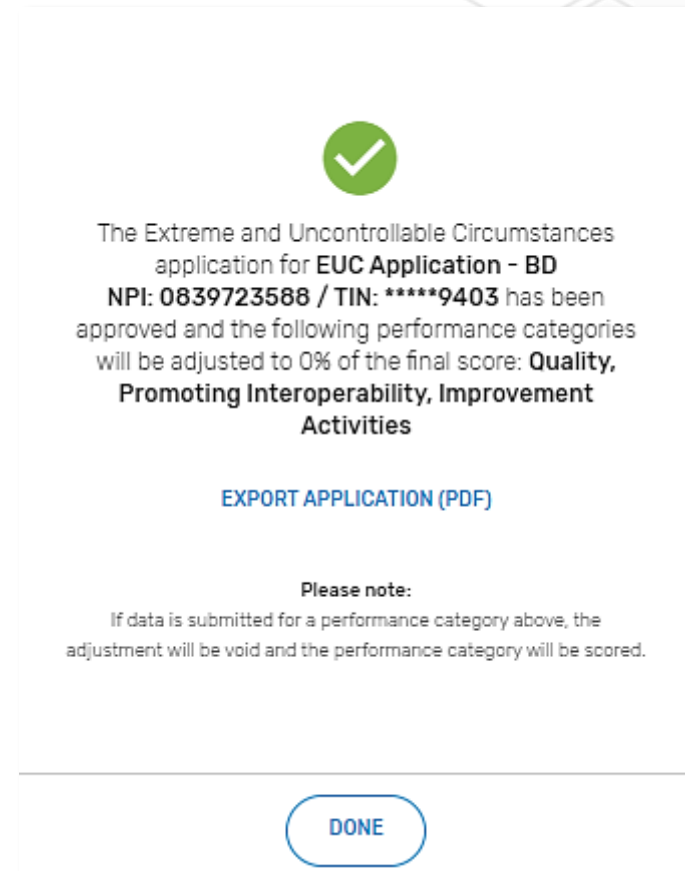


MIPS Extreme and Uncontrollable Circumstances Exception Application Process: Application Steps

Extreme and Uncontrollable Circumstances Exception Application Submission Confirmation

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

*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](#).



Help and Version History



Where Can You Go for Help?

Contact the Quality Payment Program Service Center by email at 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).

- 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 [Quality Payment Program Resource Library](#).

Version History

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

Date	Description
10/15/2024	Updated link to the QPP Access User Guide on slides 7 and 14.
03/15/2024	Updated to add slide 6 to reflect that CMS extended the data submission deadline and reopened the 2023 MIPS EUC Exception Application period.
05/01/2023	Original Posting.

Appendices



Appendices

Appendix A1.

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](#).)

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
No Reweighting				
Standard Weighting under traditional MIPS	30%	30%	15%	25%
Reweight 1 Performance Category				
No Cost (Cost → Quality and Promoting Interoperability)	55%	0%	15%	30%
No Improvement Activities (Improvement Activities → Quality)	45%	30%	0%	25%
No Promoting Interoperability (Promoting Interoperability → Quality)	55%	30%	15%	0%
No Quality (Quality → Promoting Interoperability)	0%	30%	15%	55%

Table continues on the following slide.



Appendices

Appendix A1.

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

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
Reweight 2 Performance Categories				
No Cost + No Promoting Interoperability (Cost + Promoting Interoperability → Quality)	85%	0%	15%	0%
No Cost + No Quality (Cost + Quality → Promoting Interoperability)	0%	0%	15%	85%
No Cost + No Improvement Activities (Cost + Improvement Activities → Promoting Interoperability + Quality)	70%	0%	0%	30%
No Promoting Interoperability + No Quality (Promoting Interoperability + Quality → Cost + Improvement Activities)	0%	50%	50%	0%
No Promoting Interoperability + No Improvement Activities (Promoting Interoperability + Improvement Activities → Quality)	70%	30%	0%	0%
No Quality + No Improvement Activities (Quality + Improvement Activities → Promoting Interoperability)	0%	30%	0%	70%
Reweight 3 Performance Categories				
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 and receive a neutral payment adjustment.				
Reweight 4 Performance Categories				
If all performance categories are reweighted to 0%, you'll receive a score equal to the performance threshold regardless of any data submitted or not and receive a neutral payment adjustment.				



Appendices

Appendix A2.

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.

Refer to [Appendix B](#) for reweighting policies that apply to APM Entities reporting the APP. APM Entities reporting traditional MIPS or MVPs 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
No Reweighting				
Standard Weighting under traditional MIPS for small practices	30%	30%	15%	25%
Reweight 1 Performance Category				
No Cost (Cost → Quality and Promoting Interoperability)	55%	0%	15%	30%
No Improvement Activities (Improvement Activities → Quality)	45%	30%	0%	25%
No Promoting Interoperability (Promoting Interoperability → Quality and Improvement Activities)	40%	30%	30%	0%
No Quality (Quality → Promoting Interoperability)	0%	30%	15%	55%

Table continues on the following slide.



Appendices

Appendix A2.

MIPS Performance Category Weight Redistribution Policies Under Traditional MIPS Finalized for the 2023 Performance Year: Small Practices (Continued)

MIPS Performance Category Reweighting Scenario	Quality Category Weight	Cost Category Weight	Improvement Activities Category Weight	Promoting Interoperability Category Weight
Reweight 2 Performance Categories				
No Cost + No Promoting Interoperability (Cost + Promoting Interoperability → Quality and Improvement Activities)	50%	0%	50%	0%
No Cost + No Quality (Cost + Quality → Promoting Interoperability)	0%	0%	15%	85%
No Cost + No Improvement Activities (Cost + Improvement Activities → Promoting Interoperability + Quality)	70%	0%	0%	30%
No Promoting Interoperability + No Quality (Promoting Interoperability + Quality → Cost + Improvement Activities)	0%	50%	50%	0%
No Promoting Interoperability + No Improvement Activities (Promoting Interoperability + Improvement Activities → Quality)	70%	30%	0%	0%
No Quality + No Improvement Activities (Quality + Improvement Activities → Promoting Interoperability)	0%	30%	0%	70%

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.



Appendices

Appendix B.

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.

Reminder: APM Entities can only submit an EUC Exception 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 the 2023 performance year. 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
No Reweighting				
Standard Weighting under the APP	50%	0%	20%	30%
Reweight 1 Performance Category				
No Promoting Interoperability (Promoting Interoperability → Quality)	75%	0%	25%	0%
No Quality (Quality → Promoting Interoperability)	0%	0%	25%	75%
Reweight 2+ Performance Categories				
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 and receive a neutral payment adjustment.				



Appendices

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	 Submitted - Pending Approval	 Approved	 Withdrawn
You're currently working on your application and haven't submitted it yet. Select Manage to continue working on your application.	You've successfully completed and submitted your application. Applications are reviewed in the order of which they're received.	We completed our review of your application and approved your request.	You've 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.	