

## Extreme and Uncontrollable Circumstances Application & COVID-19

The COVID-19 pandemic has impacted all clinicians across the United States and territories. However, CMS recognizes that not all practices have been impacted by COVID-19 to the same extent. For the 2020 performance year, CMS will be using the Extreme and Uncontrollable Circumstances policy to allow MIPS eligible clinicians, groups, and virtual groups to submit an application requesting reweighting of one or more MIPS performance categories to 0% due to the current COVID-19 public health emergency.

- If you have any concerns about the effect of the COVID-19 pandemic on your performance data, including cost measures, for the 2020 performance period, [submit an application now](#) and be sure to cite COVID-19 as the reason for your application.
- If you have an approved application, you can still receive scores for the Quality, Improvement Activities, and Promoting Interoperability performance categories if you submit data. If the cost performance category is included in your approved application, you will not be scored on cost measures even if other data are submitted. Learn more in the [2020 Exceptions Applications Fact Sheet](#).
- Note:** CMS has proposed to allow APM Entities to submit an application to reweight MIPS performance categories as a result of extreme and uncontrollable circumstances, such as the public health emergency resulting from the COVID-19 pandemic. Learn more in the [2021 Quality Payment Program Proposed Rule Overview Fact Sheet](#).

### MIPS Promoting Interoperability Hardship Exceptions

- MIPS eligible clinicians, groups, and virtual groups may qualify for a re-weighting of the Promoting Interoperability performance category to 0% if they:
  - Are a small practice;
  - Have decertified EHR technology;
  - Have insufficient Internet connectivity;
  - Face extreme and uncontrollable circumstances such as disaster, practice closure, severe financial distress, or vendor issues; **or**
  - Lack control over the availability of CEHRT.
- If you're already exempt from reporting Promoting Interoperability data, you don't need to apply.

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### How do you apply?

- You must have a HCQIS Access Roles and Profile (HARP) account to complete and submit an exception application on behalf of yourself, or another MIPS eligible clinician, group, virtual group or APM Entity. For more information on HARP accounts, please refer to the Register for a HARP Account document in the [QPP Access User Guide](#).
- Once you register for a HARP account, sign in to [qpp.cms.gov](http://qpp.cms.gov), select 'Exceptions Applications' on the left-hand navigation, select 'Add New Exception,' and select 'Extreme and Uncontrollable Circumstances Exception' or 'Promoting Interoperability Hardship Exception.'

### How do you know if you are approved?

- If you submit an application for either of the exceptions, you will be notified by email if your request was approved or denied. If approved, this will also be added to your eligibility profile on the [QPP Participation Status Tool](#), but may not appear in the tool until the submission window is open in 2021.

### Need more information?

- Visit the [Promoting Interoperability Hardship Exception](#) and [Extreme and Uncontrollable Circumstances Exception](#) QPP webpages for more information and links to each application.
- Check out the [Exceptions Application Fact Sheet](#) to learn more about these exceptions.
- Contact NC AHEC Practice Support via your local practice support coach or [practicesupport@nchaec.net](mailto:practicesupport@nchaec.net).

Note the information provided is listed on the CMS QPP website at:

<https://qpp.cms.gov/mips/exception-applications>.