

Reference #: **2024-56-PCH**  
 From: Inpatient and Outpatient Healthcare Quality Systems Development and Program Support  
 Sent: October 29, 2024  
 To: MLN Connects Newsletter and Other Program-Specific ListServ Recipients Lists  
 Subject: Reporting Exception Granted Due to Hurricane Francine

The Centers for Medicare & Medicaid Services (CMS) is granting exceptions<sup>1</sup> under certain Medicare quality reporting and value-based purchasing programs to providers and facilities located in areas affected by *Hurricane Francine*, as identified by both a Department of Health and Human Services (HHS) Public Health Emergency (PHE) declaration (<https://aspr.hhs.gov/legal/PHE/Pages/LA-Hurricane-Francine.aspx>) and the Federal Emergency Management Agency (FEMA) disaster declaration ([DR-4817-LA](#)) to assist these providers and facilities while they direct their resources toward caring for their patients and addressing potential infrastructural challenges affecting their healthcare operations.

Affected areas covered by these exceptions are detailed on the [Designated Areas: Disaster 4817](#) pages, under the section Public Assistance, designations PA-A and PA-B, of the FEMA website. If FEMA expands the emergency disaster declaration to include additional affected areas at a later date, CMS will likewise extend reporting requirement exceptions to accommodate these areas but will not necessarily publish updated communications.

At the time of this communication, the exceptions being granted are for the reporting requirements and deadlines as detailed in the table below.

Program	Affected Measure/Requirement(s)	Performance Period and Submission Deadline
Hospital Inpatient Quality Reporting (IQR) Program	Hybrid Hospital-Wide Readmission (HWR) and Hospital-Wide Mortality (HWM)	July 1, 2023 through June 30, 2024 (submission deadline 10/1/2024)

**CONSIDERATIONS FOR AFFECTED PROVIDERS AND FACILITIES THAT CHOOSE TO REPORT DATA UNDER AN EXTRAORDINARY CIRCUMSTANCE EXCEPTION (ECE)**

Providers and facilities should be aware of the potential impact to reporting requirements and payment programs when deciding whether or not to report data included in the exceptions. If data are voluntarily submitted, they will be publicly reported or used in scoring.

**OTHER CMS QUALITY PROGRAM EXCEPTION POLICIES**

**Additional Reporting Requirement Exceptions**

Providers and facilities located within a designated area listed in the FEMA disaster declaration who seek an exception for a reporting requirement not covered by this table may request an individual exception using the applicable [Extraordinary Circumstance Exception](#) (ECE) request process for the respective program(s). CMS will assess and decide upon each ECE request on a case-by-case basis.

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<sup>1</sup> The terminology “exception” is used as a general term intended for ease of reference, to collectively refer to policies established under separate programs, and may not be consistent with the specific terminology established under each individual program.

**Merit-based Incentive Payment System (MIPS)**

In addition to the above table, the MIPS automatic Extreme and Uncontrollable Circumstances (EUC) policy will be applied at the individual level to MIPS eligible clinicians identified as located in the aforementioned affected areas. Additional information on this policy can be found in the [2024 MIPS Automatic EUC Factsheet](#).

Program	Affected Measure/Requirement(s)	Performance Period and Submission Deadline
Merit-based Incentive Payment System (MIPS)	Consumer Assessment of Healthcare Providers and Systems (CAHPS) for MIPS survey	CY 2024 (submission deadline March 31st, 2025)
	Electronic Clinical Quality Measures (eCQMs)	
	Medicare Part B claims measures	
	MIPS Clinical Quality Measures (CQMs)	
	Qualified Clinical Data Registry (QCDR) Measures	

**CASES OF NON-EXCEPTION**

**Program Participants in Non-Designated Areas**

Providers and facilities located outside the FEMA-designated areas are not covered by these exceptions, but they may request an exception to the reporting requirements under one or more Medicare quality reporting or value-based purchasing programs they participate in using the applicable ECE request process for the respective program(s). CMS will assess and decide upon each ECE request on a case-by-case basis.

**End-Stage Renal Disease Quality Incentive Program (ESRD QIP)**

The ESRD QIP does not participate in these exceptions. Impacted dialysis facilities should submit ECE requests according to the process and form found on the [ESRD QIP QualityNet ECE Policy Page](#) within 90 days of the event.

**Medicare Promoting Interoperability Program**

Under the Medicare Promoting Interoperability Program, a [Hardship Exception Application](#) may be available for eligible hospitals and critical access hospitals affected by the aforementioned disaster, as long as the requesting eligible hospital or critical access hospital has not met the 5 hardship maximum (as set forth in Social Security Act section 1886(b)(3)(B)(ix)(II)).

**ADDITIONAL INFORMATION**

Program	ECE Email Contact for Inquiries	Additional ECE Information
ESRD QIP	<a href="mailto:QRFormsSubmission@hsag.com">QRFormsSubmission@hsag.com</a>	<a href="#">ESRD QIP Information</a>
HH QRP	<a href="mailto:HHAPUreconsiderations@CMS.hhs.gov">HHAPUreconsiderations@CMS.hhs.gov</a>	<a href="#">Home Health Quality Reporting (HHQR) Program ECE Information</a>

Home Health Value-Based Purchasing (HHVBP) Model	<a href="mailto:HHVBPquestions@lewin.com">HHVBPquestions@lewin.com</a>	<a href="#">HHVBP Information</a>
Hospice QRP	<a href="mailto:HospiceQRPreconsiderations@cms.hhs.gov">HospiceQRPreconsiderations@cms.hhs.gov</a>	<a href="#">Hospice QRP ECE Information</a>
Hospital IQR, IPFQR, PCHQR, Hospital VBP, ASCQR, OQR, REHQR, HAC Reduction, and Hospital Readmissions Reduction Programs, Hospital Validation	<a href="mailto:QRFormsSubmission@hsag.com">QRFormsSubmission@hsag.com</a>	<a href="#">Hospital and ASC QRPs ECE Information</a>
IRF QRP	<a href="mailto:IRFQRPreconsiderations@cms.hhs.gov">IRFQRPreconsiderations@cms.hhs.gov</a>	<a href="#">IRF QRP ECE Information</a>
LTCH QRP	<a href="mailto:LTCHQRPreconsiderations@cms.hhs.gov">LTCHQRPreconsiderations@cms.hhs.gov</a>	<a href="#">LTCH QRP ECE Information</a>
Medicare Promoting Interoperability Program	<a href="https://cmsqualitysupport.servicenow.com/qnet_qa">https://cmsqualitysupport.servicenow.com/qnet_qa</a>	<a href="#">Medicare Promoting Interoperability Program Hardship Exception Information</a>
MIPS/QPP	<a href="mailto:qpp@cms.hhs.gov">qpp@cms.hhs.gov</a>	<a href="#">QPP; QPP Resource Center</a>
SNF QRP	<a href="mailto:SNFQRPreconsiderations@cms.hhs.gov">SNFQRPreconsiderations@cms.hhs.gov</a>	<a href="#">SNF QRP ECE Information</a>
SNF VBP Program	<a href="mailto:SNFVBP@rti.org">SNFVBP@rti.org</a>	<a href="#">SNF VBP Program ECE Information</a>

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