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From: Inpatient and Outpatient Healthcare Quality Systems Development
and Program Support

Sent: October 31, 2024

To: General Reminder LS Recipients for PI Program

Subject: **Important Reminder: Medicare Promoting Interoperability Program CY 2023
Hardship Exception Application Deadline for Critical Access Hospitals is November 30,
2024**



Medicare Promoting Interoperability PROGRAM

CY 2023 Hardship Exception Application Deadline for CAHs is November 30, 2024

The deadline to submit a calendar year (CY) 2023 Hardship Exception application for the Medicare Promoting Interoperability Program for critical access hospitals (CAHs) is **November 30, 2024**.

Key Details:

- On May 1, 2024, the Centers for Medicare & Medicaid Services (CMS) opened the Hardship Exception application period for CAHs and eligible hospitals that participated in the Medicare Promoting Interoperability Program for the CY 2023 reporting period.
- CAHs must submit their Hardship Exception application by **November 30, 2024**, to be considered for an exemption from a downward payment adjustment.

How to Submit Your Hardship Exception Application:

- CAHs may submit their application electronically at the following website:
https://cmsqualitysupport.servicenowservices.com/cms_hh

- If you are unable to submit electronically, please contact the Center for Clinical Standards and Quality Service Center (CCSQ) Service Center at (866) 288-8912 for assistance in completing a verbal application.

About the Hardship Exception:

- For the CY 2023 reporting period, eligible hospitals and CAHs were required to use 2015 Edition Cures Update certified electronic health record technology (CEHRT) to meet the [Medicare Promoting Interoperability Program requirements](#).
- A downward payment adjustment will apply to CAHs that were not meaningful users of CEHRT, did not meet the minimum score of 60 points, or failed to report electronic clinical quality measure (eCQM) data as required.
- CAHs may apply for a Hardship Exception if compliance would result in significant hardship. Please note that simply lacking CEHRT does not qualify for an exception.
- If granted, the Hardship Exception applies only for the payment adjustment year, and CAHs must reapply annually. No more than five exceptions may be granted to any one CAH.

Hardship Exception Categories Include:

- **Infrastructure** — CAHs must demonstrate that they are in an area without sufficient internet access or face insurmountable barriers to obtaining necessary infrastructure (e.g., lack of broadband).
- **Unforeseen Circumstances** — This may include events like natural disasters or other unforeseeable barriers that prevent compliance.
- **EHR Vendor Issues** — This applies if a CAH's EHR vendor was unable to obtain certification or the CAH experienced delays in EHR implementation due to certification issues.

Additional Resources:

- For more information on the Hardship Exception process, view the [Hardship Exception Fact Sheet](#).
- For further details on the Medicare Promoting Interoperability Program, visit the [Promoting Interoperability Program Website](#).
- For general questions regarding the Medicare Promoting Interoperability Program, please submit them to the [Quality Question and Answer Tool](#).

Please do not respond directly to this email.