
Hardship Application - ACI Category

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You can apply for a hardship exemption for the “Advancing Care Information” (ACI) category of the Quality Payment Program’s Merit-based Incentive Payment System. ACI counts for 25% of the composite performance score for eligible clinicians (ECs) in the government’s new payment program. The application, which is being accepted now, mirrors the exceptions historically available to “Meaningful Use” participants. If accepted, the ACI category will be reweighted to 0%, thus shifting your score to be formulated on the basis of Quality (85%) and Improvement Activities (15%) in 2017.

Applications are being accepted on a rolling basis for: insufficient internet connectivity, extreme and uncontrollable circumstances, and lack of control over the availability of Certified EHR Technology (CEHRT). The Centers for Medicare & Medicaid Services (CMS) specifically includes switching vendors in 2017 as an “extreme and uncontrollable circumstance.”

Regardless of the category, there is no supporting documentation required. However, CMS advises: “Clinicians and groups should retain documentation of their circumstances supporting their application for their own records in the event CMS requests data validation or audit.”

So-called “special-status” clinicians are automatically exempt and do not need to complete an application; these include hospital-based MIPS-ECs, non-patient-facing ECs and advanced practice providers.

If you’re not sure about participating in ACI – and thus, not sure if you should submit this application - note that CMS will score your ACI submission regardless. CMS reveals: “You may still report on the ACI performance category, and if you choose to report, your data will be scored. If you have a pending or approved hardship exception application and choose to report on the advancing care information measures, your hardship exception application will be dismissed.” Therefore, there’s no downside to submitting an application.

Applications are being accepted for practices, as well as individual providers. Once submitted, you will receive a confirmation via email, and whether the application is pending, approved, or dismissed.

[Click here for a link](#) to the application. For the hardship-exception website, please visit [this page](#).

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attorney for legal advice, as specific legal requirements may vary from state to state and/or change over time.