
Applications for QPP Exception Due Soon

By Elizabeth Woodcock, MBA, FACMPE, CPC

The financial impact of the Quality Payment Program will soon be felt. On January 1, 2019, the reimbursement for Medicare will be shifted based on your performance in 2017. Although it's too late to avoid the 2019 penalty of 4%, you have until December 31, 2018, to possibly dodge the 2020 sanction, or at least a portion of the program's requirements. The Centers for Medicare & Medicaid Services (CMS) includes a change in EHR system vendors, as well as a natural disaster, as "Extreme and Uncontrollable Circumstances," allowing you to avoid the penalty for those reasons alone - but you must submit the application.

Simply being a "small practice" - defined as 15 eligible clinicians or less - will dismiss you from the "Promoting Interoperability" (PI) requirements (the new name for the 'Advancing Care Information' category), but the application is required. If you are on the fence as to your success in participation, consider applying just to hedge your bets. According to the FAQs posted by CMS, "You may still report on the Promoting Interoperability 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 Promoting Interoperability measures, your hardship exception application will be dismissed and the category will not be reweighted." There is really no downside to applying; if you wait until January (when the 2018 reporting opens) and discover a problem with your submission, it will be too late to apply for the exemption.

If you are part of an Accountable Care Organization (ACO) that qualifies as a Merit-based Incentive Payment System Alternative Payment Model (MIPS APM), you will need to report the PI category to CMS directly, or deploy this option if you meet the exception and submit an application.

Regardless of the reason, applications are required each year. You can apply for the exception [here](#).

The contents of The Sentinel are intended for educational/informational purposes only and do not constitute legal advice. Policyholders are urged to consult with their personal attorney for legal advice, as specific legal requirements may vary from state to state and/or change over time.