

Extreme and Uncontrollable Circumstances Hardship Exception Application Guide

2024 Final Document versus 2025 Final Document

Burden impact: The changes in this guide don't reflect policies in the CY 2026 Physician Fee Scheduled (PFS) proposed rule for the Quality Payment Program. There is no impact to burden as a result of the changes reflected in this crosswalk.

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Change #1:

Location:

2024 – Page 1

2025 – Page 1

Reason for Change:

Alignment with current program year

2024 Final Document text:

Title: 2024 Extreme and Uncontrollable Circumstances Exception Application Guide

2025 Final Document text:

Title: 2025 Extreme and Uncontrollable Circumstances Exception Application Guide

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Change #2:

Location:

2024 – Page 6

2025 – Page 6

Reason for Change:

Updated based on policy dates for the 2025 performance year.

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: When

The MIPS EUC Exception application will close at 8 p.m. ET on December 31, 2024.

2025 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: When

The MIPS EUC Exception application will close at 8 p.m. ET on December 31, 2025.

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Change #3:

Location:

2024 – Page 7

2025 – Page 7

Reason for Change:

Updated based on policy changes for the 2025 performance year.

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: N/A

2025 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: Policies for Individual Clinicians, Groups, and Virtual Groups

A qualifying data submission voids the 0% performance category weight on a category-by-category basis; a non-qualifying (incomplete) submission for a performance category won't void its 0% weighting. See Appendix D for more information.

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Change #4:**Location:**

2024 – Page 7

2025 – Page 7

Reason for Change:

Updated dates for new performance year.

2024 Final Document text:

Section: Extreme and Uncontrollable Circumstances Exception Application Overview

- **Content:** If you submit Medicare Part B Claims measures during the performance year, this will override quality performance category reweighting. However, if you request and are approved for reweighting in all 4 performance categories and don't submit data for another performance category, your MIPS final score for the 2024 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2026.
- When fewer than 2 performance categories can be scored (meaning 1 performance category is weighted at 100% of your MIPS final score, and the other performance categories are weighted at 0%), the MIPS final score for the 2024 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2026.

2025 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

- **Content:** If you submit Medicare Part B Claims measures during the performance year, this will override quality performance category reweighting. However, if you request and are approved for reweighting in all 4 performance categories and don't submit data for another performance category, your MIPS final score for the 2025 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2027.

- When fewer than 2 performance categories can be scored (meaning 1 performance category is weighted at 100% of your MIPS final score, and the other performance categories are weighted at 0%), the MIPS final score for the 2025 MIPS performance period would be equal to the performance threshold and you would receive a neutral payment adjustment in 2027.

Change #5:

Location:

2024 – Page 11

2025 – Page 11

Reason for Change:

Clarify performance category reweighting for an Extreme and Uncontrollable Circumstances Exception.

2024 Final Document text:

Section: Extreme and Uncontrollable Circumstances Exception Application Overview

Content: Clinicians who register to report an MVP as a subgroup will inherit the performance category reweighting approved for their affiliated group.

- Submission by the affiliated group won't override performance category reweighting for the subgroup.
- Submission by the subgroup won't override performance category reweighting for the affiliated group, it will only override performance category reweighting for the subgroup.

Subgroups **can't** submit a MIPS EUC Exception application as outlined in this guide.

2025 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: Clinicians who register to report an MVP as a subgroup will inherit the performance category reweighting approved for their affiliated group. *That is, subgroups will inherit any reweighting approved for their affiliated group. However, a qualifying data submission can affect performance category reweighting:*

- A *qualifying data* submission by the affiliated group won't override performance category reweighting for the subgroup.
- A *qualifying data* submission by the subgroup won't override performance category reweighting for the affiliated group, it will only override performance category reweighting for the subgroup.

Subgroups **can't** submit a MIPS EUC Exception application as outlined in this guide.

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Change #6:

Location:

2024 – Page 12

20245 – Page 12

Reason for Change:

Updated list of APM Entities to link to external list of APMs.

2024 Final Document text:

Section: Extreme and Uncontrollable Circumstances Exception Application Overview

Content: Policies for APM Entities

APM Entities in the following models can submit an EUC Exception application on behalf of their MIPS eligible clinicians:

- *ACO Realizing Equity Access and Community Health (ACO REACH)*
- *Advancing All-Payer Health Equity Approaches and Development (AHEAD) Model**
- *Bundled Payments for Care Improvement (BPCI) Advanced Model*
- *Comprehensive Care for Joint Replacement (CJR) Payment Model*
- *Enhancing Oncology Model (EOM)*
- *Guiding an Improved Dementia Experience (GUIDE) Model*
- *Kidney Care Choices (KCC)*
- *Making Care Primary (MCP)*
- *Maryland Total Cost of Care Model*
- *Medicare Shared Savings Program*
- *Primary Care First (PCF)*
- *States AHEAD Model - Hospital Track**
- *Value in Opioid Use Disorder Treatment (ViT)*
- *Vermont Medicare ACO Model*

2025 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application Overview

Content: Policies for APM Entities

- *Review the Connect to an Organization resource in the QPP Access User Guide (ZIP, 4MB) for more information on obtaining the Security Official role. For a list of active APMs please refer the 2024 and 2025 Comprehensive List of APMs.*

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Change #7

Location:

2024 – Page 17

2025 – Page 17

Reason for Change:

Updated based on policy changes for the 2024 performance year.

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Frequently Asked Questions

Content: Our Third Party Intermediary Experienced Issues and Is Unable to Submit Data on Our Behalf. Can We Submit an EUC Exception Application for this Issue?

- *As noted in the [Calendar Year 2018 Quality Payment Program Final Rule](#), extreme and uncontrollable circumstances, such as natural disasters, may affect a clinician's ability to access or submit quality measures via all submission mechanisms (effectively rendering the measures unavailable to the clinician), as well as the availability of numerous improvement activities. In addition, damage to a facility where care is provided due to a natural disaster, such as a hurricane, could result in practice management and clinical systems that are used for the collection or submission of data to be down, thus impacting a clinician's ability to submit necessary information via Qualified Registry, QCDR, CMS Web Interface, or claims.*
- *This policy doesn't include issues that third party intermediaries, such as Electronic Health Record vendors (EHRs), QCDRs, or Qualified Registries, might have submitting information to MIPS on behalf of a MIPS eligible clinician.*
- *Instead, this policy is geared towards events, such as natural disasters, that affect the MIPS eligible clinician's ability to submit data to the third party intermediary, which in turn, could affect the ability of the clinician (or the third party intermediary acting on their behalf) to successfully submit measures and activities to MIPS.*

2025 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Frequently Asked Questions

Content: Our Third Party Intermediary Experienced Issues and Is Unable to Submit Data on Our Behalf. Can We Submit an EUC Exception Application for this Issue?

- *Our EUC policy doesn't include third party intermediaries, such as Electronic Health Record vendors (EHRs), QCDRs, or Qualified Registries that submit data on behalf of a MIPS eligible clinician. Instead, this policy is geared towards events, such as natural disasters or ransomware attacks, that affect the MIPS eligible clinician's ability to collect and submit data to the third party intermediary, which in turn, could affect the ability of the clinician (or the third party intermediary acting on their behalf) to successfully submit measures and activities to MIPS.*
- *Furthermore, the MIPS EUC Exception Application is available during the performance year; if you discover during the performance year that your third party is having issues, you may need to find another third party to submit your data. You can also submit your own data by uploading a file or attesting to certain performance categories.*
- *If you discover during or after the submission period that your third party intermediary is unable to (or didn't) submit your data, please contact the Service Center.*

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Change #8:

Location:

2024 – Page 27

2025 – N/A

Reason for Change:

Updated to align with current policy.

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Application Steps

Content: *Applications due to the Change Healthcare Cyberattack in late February should include “Ransom/Malware” as the Event Type. Once selected, confirm that the ransom/malware event pertained to the Change Healthcare Cyberattack.*

2025 Final Document text:

Section: N/A

Content: N/A

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Change #9:

Location:

2024 – Page 28, 36-40

2025 – Page 26, 34-38

Reason for Change:

Updated dates for new performance and payment year.

2024 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Application Steps and Appendices

Content: References program year 2024 and payment year 2026.

2025 Final Document text:

Section: MIPS Extreme and Uncontrollable Circumstances Exception Application
Process: Application Steps and Appendices

Content: Update program year 2025 and payment year 2027 references.

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Change #10:

Location:

2024 – N/A

2025 – Page 40

Reason for Change:

Updated to align with current policy.

2024 Final Document text:

Section: N/A

Content: N/A

2025 Final Document text:

Section: Appendices

Content: Appendix D. Minimum Criteria for a Qualifying Data Submission

The minimum criteria for a qualifying data submission (i.e., eligible for scoring) in the quality, improvement activities, and Promoting Interoperability performance categories are:

- **Quality Performance Category:** *A qualifying data submission for the quality performance category must include numerator and denominator information for at least one quality measure from the list of MIPS quality measures to be considered a data submission and scored. Data submissions without any scorable data (e.g., practice ID, date, activity ID, measure ID, or CMS Electronic Health Record (EHR) Certification ID (CEHRT ID)) wouldn't satisfy the submission criteria.*
- **Improvement Activities Performance Category:** *A qualifying data submission for the improvement activities performance category must include a "yes" response for at least one improvement activity to be considered a data submission and scored. A submission with only a date and practice ID won't be considered a data submission and will be assigned a null score.*
- **Promoting Interoperability Performance Category:** *A qualifying data submission for the Promoting Interoperability performance category must include all of the following elements:*
 - *Performance data, including any claim of an applicable exclusion, for the required measures in each objective, as specified by CMS;*
 - *Required attestation statements, as specified by CMS;*
 - *CMS EHR Certification ID (CEHRT ID) from the Certified Health IT Product List (CHPL); and*
 - *The start date and end date for the applicable performance period as set forth in § 414.1320.*
- *A Promoting Interoperability data submission with only a date and practice ID won't be considered a qualifying data submission and will be assigned a null score; it won't override reweighting of the Promoting Interoperability performance category.*
- *The minimum criteria for a qualifying data submissions is intended to mitigate the negative scoring impact on clinicians due to unintentional submissions without data that can be scored, which would override an approved reweighting application or a prior data submission and result in a zero score.*

According to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.), no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0938-1314 (Expiration date: 2/28/2027). This information collection is the tool for the MIPS Extreme and Uncontrollable Circumstances (EUC) Exception application allows you to request reweighting for one or more performance categories to 0%. The time required to complete this information collection is estimated to average varies per response, including the time to review instructions, search existing data resources, gather the data needed, to review and complete the information collection. This information collection is voluntary and all information collected will be kept private in accordance with regulations at 45 CFR 155.260, Privacy and Security of Personally Identifiable Information. Pursuant to this regulation, CMS may only use or disclose personally identifiable information to the extent that such information is necessary to carry out their statutory and regulatory mandated functions. If you have comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: CMS, 7500 Security Boulevard, Attn: PRA Reports Clearance Officer, Mail Stop C4-26-05, Baltimore, MD 21244-1850. If you have questions or concerns regarding where to submit your documents, please contact QPP at qpp@cms.hhs.gov.

Under the Privacy Act of 1974 (5 U.S.C. 552a) any personally identifying information obtained will be kept private to the extent of the law.