

Exemptions and Special Considerations

The qualifications for the Low Volume Exemption have changed for 2018! This year, individual clinicians or groups with less than or equal to **\$90,000** in Medicare Part B allowed charges or providing care to less than or equal to **200 Part B beneficiaries** do NOT have to participate in QPP. Check your participation status at <https://qpp.cms.gov/participation-lookup> to be sure. How does CMS know if you're eligible? There are two evaluation dates per year; if you are not eligible in the first period, you are exempt for the whole year.

Providers in **small practices** (15 or fewer eligible clinicians) receive **5 bonus points** to their final score providing they submit data for at least 1 performance category (Cost Performance Category does not count). "Eligible clinician" is defined as Physicians, Physician Assistants, Nurse Practitioners, Clinical Nurse Specialists and Certified Registered Nurse Anesthetists. Providers in small practices will also continue to receive **3 points** for measures in the Quality Performance Category that do not meet data completeness threshold of 60%. Similarly, providers in small practices or in rural/health care professional shortage areas earn full credit for the Improvement Activities Performance Category with just **2 activities** (2 medium weight or 1 high weight). Don't know if you're in a health care professional shortage area? Find out by inputting your address at <https://datawarehouse.hrsa.gov/tools/analyzers/geo/ShortageArea.aspx>

Use of 2014 or 2015 Edition CEHRT is required for the Advancing Care Information/Promoting Interoperability Performance Category; lacking CEHRT is not a sufficient reason to be exempt from the ACI/PI Performance Category. However, providers can submit a Quality Payment Program **Hardship Exception Application** to be have their scores reweighted (Quality 75%; Cost 10%; IA 15%) for the following reasons:

- MIPS-eligible clinicians in small practices (see above for definition)
- MIPS-eligible clinicians using decertified EHR technology
- Extreme and uncontrollable circumstances
- Insufficient internet connectivity
- Lack of control over CEHRT availability

You must **submit** for a Hardship Exception for these reasons, it will not be automatically granted! Forms will be available in late summer 2018.