

Medicare Promoting Interoperability PROGRAM

ELIGIBLE HOSPITALS AND CRITICAL ACCESS HOSPITALS CALENDAR YEAR 2024 HARDSHIP EXCEPTION FACT SHEET

CMS understands that there may be circumstances out of your control that make it difficult for you to successfully meet the Medicare Promoting Interoperability Program requirements. CMS provides eligible hospitals and critical access hospitals (CAHs) the opportunity to apply for a Hardship Exception. If a Hardship Exception is granted, that eligible hospital or CAH avoids a downward payment adjustment for the Medicare Promoting Interoperability Program.

Calendar Year (CY) 2024 Hardship Exception Application Dates

Hospital Type	Application Period Opens	Application Period Deadline
Eligible Hospital*	5/1/2025	9/2/2025
CAH**	5/1/2025	10/31/2025

*The hardship exception application applies to the fiscal year (FY) 2026 payment determination.

**The hardship exception application applies to the FY 2024 payment determination.

Please sign up to receive updates and announcements on the Medicare Promoting Interoperability Program and Hardship Exception Process on the [CMS.gov website](https://www.cms.gov).

How to Submit Your Hardship Exception Application

We have gone paperless for the Medicare Promoting Interoperability Program Hardship Exception application, and eligible hospitals and CAHs can submit their application electronically at the following website: https://cmsqualitysupport.servicenow.com/cms_hh.

If an electronic submission is not possible, please contact the CCSQ Service Center at (866) 288-8912 for assistance in completing a verbal application.

For information regarding the Medicare Promoting Interoperability Program and Hardship Exception Process, please contact Inpatient and Outpatient Healthcare Quality Systems Development and Program Support at the QualityNet Question and Answer Site at https://cmsqualitysupport.servicenow.com/qnet_qa?id=ask_a_question or by phone at (844) 472-4477.

Hardship Exception Overview

For CY 2024, the [Office of the National Coordinator Health Information Technology certification criteria](#) are required to meet the certified electronic health record (EHR) technology (CEHRT) definition for the Medicare Promoting Interoperability Program. Eligible hospitals and CAHs may be exempt from a Medicare downward payment adjustment if they can show that compliance with the requirement for being a meaningful EHR user would result in a significant hardship. Simply lacking CEHRT does not qualify an eligible hospital or CAH for a Hardship Exception.



To be considered for an exception (to avoid a downward payment adjustment), eligible hospitals and CAHs must complete and submit a Hardship Exception [application](#). If approved, the Hardship Exception is valid for only one payment adjustment year. Eligible hospitals and CAHs would need to submit a new application for subsequent years and ***no eligible hospital or CAH can receive more than five exceptions in a lifetime.***

Eligible hospitals and CAHs may submit a Medicare Promoting Interoperability Program Hardship Exception application citing one of the following specified reasons for review and approval:

- Insufficient internet connectivity
- Extreme and uncontrollable circumstances.
 - Disaster
 - Hospital Closure
 - Severe Financial Distress (Bankruptcy or Debt Restructuring)
 - EHR Certification/Vendor Issues (CEHRT Issues)

Frequently Asked Questions

How does an eligible hospital or CAH demonstrate meaningful use in order to avoid a payment adjustment?

An eligible hospital or CAH demonstrates meaningful use by successfully reporting their Medicare Promoting Interoperability Program data through the Hospital Quality Reporting (HQR) system.

Does CMS require the submission of supporting documentation along with the Hardship Exception application?

CMS does not require an eligible hospital or CAH to submit documentation with the Hardship Exception application. CMS will review the application to record the category selected and use the identifying information for each eligible hospital and CAH listed on the application. Eligible hospitals and CAHs should retain documentation of their circumstances supporting their application for their own records in the event CMS requests an audit.

Can an eligible hospital or CAH that switched EHR vendors apply for a Hardship Exception and avoid a negative payment adjustment?

Yes, if an eligible hospital or CAH switches EHR vendors during their self-selected reporting period and is unable to demonstrate meaningful use, the eligible hospital or CAH can submit a Hardship Exception application. CMS grants hardship exceptions on a case-by-case basis.

What if my electronic health record product is decertified?

If your EHR product is decertified, you can still use that product to submit your measures if the reporting period ended before the decertification occurred. If your reporting period ended after the decertification occurred, you can apply for a Medicare Promoting Interoperability Program Hardship Exception.

