

ACO UPDATE

October 2019 - Issue 51

Hardship Exemption for "Promoting Interoperability" (formally Advancing Care Information)

Participant TINs in Medicare Shared Savings Program (MSSP)
Accountable Care Organizations (ACOs) will submit their quality and
Clinical Practice Improvement Activities for MIPS through the ACO.
Participant TINs must report "Promoting Interoperability" (PI)
(formally Advancing Care Information) independent of the ACO.
Please note, the ONLY quality measure that is the provider's
responsibility is to report PI. Please report PI directly to CMS.

If you or your practice are unable to report PI, please review CMS' criteria for requesting a "Hardship Exemption." For PY2019, the following are permitted reasons for a hardship exemption from reporting PI:

- MIPS-eligible clinicians in small practices
- MIPS-eligible clinicians using decertified EHR technology
- Insufficient Internet connectivity
- Extreme and uncontrollable circumstances
- · Lack of control over the availability of CEHRT

The ACO cannot request a hardship exemption on your behalf. Only the Participant TIN or NPI can request a hardship exemption from CMS. The deadline to request an exemption for PY2019 is <u>December 31, 2019</u>.

If you believe that you or practice are eligible for a hardship exemption, the link below provides step-by-step instructions on how to apply online.

https://www.scripps.org/sparkle-assets/documents/hardship-exemption-process-instructions-py2019.pdf

Scripps Accountable Care Organization (ACO) Board

Kevin Hirsch, MD, Chair

Dan Dworsky, MD

Scott Eisman, MD

C. Lucy Polak, MD

Robert Tjosvold

Chris Van Gorder

Jon Worsey, MD

ACO Chief Executive

Barbara Price

price.barbara@scrippshealth.org

858-678-6017

ACO Chief Medical Officer

Anil Keswani, MD keswani.anil@scrippshealth.org 858-927-5331

ACO Primary Contact

Cindy Gipson
ScrippsACO@scrippshealth.org
858-678-7478