

Reference #: **2024-146-IP**
 From: Inpatient and Outpatient Healthcare Quality Systems Development and Program Support
 Sent: October 29, 2024
 To: MLN Connects Newsletter and Other Program-Specific ListServ Recipients Lists
 Subject: Reporting Exception Granted Due to Hurricanes Helene and Milton

The Centers for Medicare & Medicaid Services (CMS) is granting exceptions¹ under certain Medicare quality reporting and value-based purchasing programs to providers and facilities located in areas affected by *Hurricanes Helene and Milton*, as identified by both Department of Health and Human Services (HHS) Public Health Emergency (PHE) declarations (<https://aspr.hhs.gov/legal/PHE/Pages/FL-Hurricane-Helene-Sept2024.aspx>, <https://aspr.hhs.gov/legal/PHE/Pages/GA-Hurricane-Helene-Sept2024.aspx>, <https://aspr.hhs.gov/legal/PHE/Pages/SC-TN-Hurricane-Helene-Sept2024.aspx>, <https://aspr.hhs.gov/legal/PHE/Pages/NC-Hurricane-Helene-Sept2024.aspx>, <https://aspr.hhs.gov/legal/PHE/Pages/FL-Hurricane-Milton-Oct2024.aspx>) and the Federal Emergency Management Agency (FEMA) disaster declarations ([DR-4828-FL](#), [DR-4830-GA](#), [DR-4829-SC](#), [DR-4827-NC](#), [DR-4832-TN](#), [DR-4834-FL](#)) to assist these providers and facilities while they direct their resources toward caring for their patients and addressing potential infrastructural challenges affecting their healthcare operations.

Affected areas covered by these exceptions are detailed on the Designated Areas: [Disaster 4828](#); [Disaster 4830](#); [Disaster 4829](#); [Disaster 4827](#); [Disaster 4832](#); and [Disaster 4834](#) pages, under the section Public Assistance, designations PA-A and PA-B, of the FEMA website. If FEMA expands the emergency disaster declaration to include additional affected areas at a later date, CMS will likewise extend reporting requirement exceptions to accommodate these areas but will not necessarily publish updated communications.

At the time of this communication, the exceptions being granted are for the reporting requirements and deadlines as detailed in the table below.

Program	Affected Measure/Requirement(s)	Reporting Period(s)/ Performance Period
Ambulatory Surgical Center Quality Reporting (ASCQR) Program	COVID-19 Vaccination Coverage Among Health Care Personnel (HCP) (COVID-19 HCP)	Quarter (Q)2 2024 (submission deadline 11/15/2024)

¹ The terminology “exception” is used as a general term intended for ease of reference, to collectively refer to policies established under separate programs, and may not be consistent with the specific terminology established under each individual program.

Hospital-Acquired Condition (HAC) Reduction Program	<u>Chart-abstracted Healthcare-associated infection (HAI) measure data:</u> <ul style="list-style-type: none"> • Central line-associated bloodstream infection (CLABSI); • Catheter-associated urinary tract infection (CAUTI); • Surgical site infection (SSI) for Colon and Abdominal Hysterectomy procedures; • Methicillin-resistant <i>Staphylococcus aureus</i> (MRSA) bacteremia; and • <i>Clostridium difficile</i> infection (CDI) 	Q2 2024 (submission deadline 11/18/24)
Hospital Inpatient Quality Reporting (IQR) Program	Hybrid Hospital-Wide Readmission (HWR)	July 1, 2023 through June 30, 2024 (submission deadline 10/1/2024)
	Hospital-Wide Mortality (HWM)	
	Population and Sampling	Q2 2024 (submission deadline 11/04/2024)
	COVID-19 HCP Severe Sepsis and Septic Shock Management	Q2 2024 (submission deadline 11/18/2024)
Hospital Outpatient Quality Reporting (OQR) Program	Patient-level, chart-abstracted clinical data (OP-18; OP-23)	Q2 2024 (submission deadline 11/01/24)
	COVID-19 HCP	Q2 2024 (submission deadline 11/15/24)
Inpatient Psychiatric Facility Quality Reporting (IPFQR) Program	COVID-19 HCP	Q2 2024 (submission deadline 11/18/24)
PPS-Exempt Cancer Hospital (PCHQR) Program	COVID-19 HCP	Q2 2024 (submission deadline 11/18/24)
	<u>Chart-abstracted HAI measure data:</u> <ul style="list-style-type: none"> • CLABSI; • CAUTI; • Colon and Abdominal Hysterectomy SSI; • MRSA; and • CDI 	
Rural Emergency Hospital Quality Reporting (REHQR) Program	Patient-level, chart-abstracted clinical data (OP-18)	Q2 2024 (submission deadline 11/01/24)
Hospital Validation/HAI Validation Templates	Hospital Acquired Conditions Reduction Program (HACRP)	Q2 2024 discharges
Hospitals Validation/Clinical Data Abstraction Center (CDAC) Record Requests	HAC Reduction Program – HAI measures	Q1 2024 and Q2 2024 discharge records
	Hospital IQR Program	
	Hospital OQR Program	

Post-Acute Care Quality Reporting Programs: Home Health Agencies (HHAs), Inpatient Rehabilitation Facilities (IRFs), Long-Term Care Hospitals (LTCHs), and Skilled Nursing Facilities (SNFs)	All Quality Reporting Program (QRP) reporting requirements, including the reporting of data on measures and any other data requested by CMS for the post-acute care quality reporting programs	Q2 2024 (submission deadline 11/15/2024)
Post-Acute Care Quality Reporting Programs: Hospices	All Quality Reporting Program (QRP) reporting requirements, including the reporting of data on measures and any other data requested by CMS for the post-acute care quality reporting programs	Q3 2024

CONSIDERATIONS FOR AFFECTED PROVIDERS AND FACILITIES THAT CHOOSE TO REPORT DATA UNDER AN EXTRAORDINARY CIRCUMSTANCE EXCEPTION (ECE)

Providers and facilities should be aware of the potential impact to reporting requirements and payment programs when deciding whether or not to report data included in the exceptions. If data are voluntarily submitted, they will be publicly reported or used in scoring.

In particular, hospitals located within the designated affected areas listed under this disaster declaration should be aware of the potential subsequent impact to the Hospital Value-Based Purchasing (VBP) Program and HAC Reduction Program minimum case threshold counts for inclusion in these programs and which measures have enough data for scoring. For example, hospitals might be scored solely on the HAC Reduction Program’s claims-based *CMS Patient Safety and Adverse Events Composite* (CMS PSI- 90) measure due to non-submissions resulting in not meeting the minimum number of Centers for Disease Control and Prevention’s HAI measures with sufficient cases. For the HAC Reduction Program, if data for the excepted period are submitted, they will be used for scoring in the program.

OTHER CMS QUALITY PROGRAM EXCEPTION POLICIES

Additional Reporting Requirement Exceptions

Providers and facilities located within a designated area listed in the FEMA disaster declaration who seek an exception for a reporting requirement not covered by this table may request an individual exception using the applicable [Extraordinary Circumstance Exception](#) (ECE) request process for the respective program(s). CMS will assess and decide upon each ECE request on a case-by-case basis.

Merit-based Incentive Payment System (MIPS)

In addition to the above table, the MIPS automatic Extreme and Uncontrollable Circumstances (EUC) policy will be applied at the individual level to MIPS eligible clinicians identified as located in the aforementioned affected areas. Additional information on this policy can be found in the [2024 MIPS Automatic EUC Factsheet](#).

Program	Affected Measure/Requirement(s)	Performance Period and Submission Deadline
Merit-based Incentive Payment System (MIPS)	Consumer Assessment of Healthcare Providers and Systems (CAHPS) for MIPS survey	CY 2024 (submission deadline March 31 st , 2025)
	Electronic Clinical Quality Measures (eCQMs)	
	Medicare Part B claims measures	
	MIPS Clinical Quality Measures (CQMs)	
	Qualified Clinical Data Registry (QCDR) Measures	

CASES OF NON-EXCEPTION

Program Participants in Non-Designated Areas

Providers and facilities located outside the FEMA-designated areas are not covered by these exceptions, but they may request an exception to the reporting requirements under one or more Medicare quality reporting or value-based purchasing programs they participate in using the applicable ECE request process for the respective program(s). CMS will assess and decide upon each ECE request on a case-by-case basis.

End-Stage Renal Disease Quality Incentive Program (ESRD QIP)

The ESRD QIP does not participate in these exceptions. Impacted dialysis facilities should submit ECE requests according to the process and form found on the [ESRD QIP QualityNet ECE Policy Page](#) within 90 days of the event.

Medicare Promoting Interoperability Program

Under the Medicare Promoting Interoperability Program, a [Hardship Exception Application](#) may be available for eligible hospitals and critical access hospitals affected by the aforementioned disaster, as long as the requesting eligible hospital or critical access hospital has not met the 5 hardship maximum (as set forth in Social Security Act section 1886(b)(3)(B)(ix)(II)). Please note that the Medicare Promoting Interoperability Program has a separate hardship exception process from the Hospital IQR Program. An exception or hardship under one program will not ensure an exception or hardship under the other program.

ADDITIONAL INFORMATION

Program	ECE Email Contact for Inquiries	Additional ECE Information
ESRD QIP	QRFormsSubmission@hsag.com	ESRD QIP Information
HH QRP	HHAPUreconsiderations@CMS.hhs.gov	Home Health Quality Reporting (HHQR) Program ECE Information
Home Health Value-Based Purchasing (HHVBP) Model	HHVBPquestions@lewin.com	HHVBP Information
Hospice QRP	HospiceQRPreconsiderations@cms.hhs.gov	Hospice QRP ECE Information

Hospital IQR, IPFQR, PCHQR, Hospital VBP, ASCQR, OQR, REHQR, HAC Reduction, and Hospital Readmissions Reduction Programs, Hospital Validation	QRFormsSubmission@hsag.com	Hospital and ASC QRPs ECE Information
IRF QRP	IRFQRPreconsiderations@cms.hhs.gov	IRF QRP ECE Information
LTCH QRP	LTCHQRPreconsiderations@cms.hhs.gov	LTCH QRP ECE Information
Medicare Promoting Interoperability Program	https://cmsqualitysupport.servicenowservices.com/qnet_qa	Medicare Promoting Interoperability Program Hardship Exception Information
MIPS/QPP	qpp@cms.hhs.gov	QPP; QPP Resource Center
SNF QRP	SNFORPreconsiderations@cms.hhs.gov	SNF QRP ECE Information
SNF VBP Program	SNFVBP@rti.org	SNF VBP Program ECE Information

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