Promoting Interoperability PROGRAMS

PAYMENT ADJUSTMENTS & HARDSHIP EXCEPTIONS TABLE FROM PY 2020

Under the Medicare Promoting Interoperability Program for performance year 2020, the Centers for Medicare & Medicaid Services (CMS) required that all eligible hospitals and critical access hospitals (CAHs) use 2015 Edition certified electronic health record technology (CEHRT) in order to avoid a downward payment adjustment. Eligible hospitals and CAHs may be exempt from the 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.

If approved, the hardship exception would be valid for one payment adjustment year. Hardship exceptions will be granted only under specific circumstances and subject to annual renewal, and only if CMS determines that a significant hardship exists. In no case will a hardship exception be granted for more than five years.

The table below outlines the payment adjustment years and hardship exception application deadlines based on a health care provider's years of participation from performance year 2020.

Performance Year	Provider Type	Hardship Exception Application Deadline*	Payment Adjustment Year
2020	Eligible Hospital (first year and returning participants)	September 1, 2021	2022
	CAHs	September 1, 2021	2020

^{*}Dates are subject to change



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