## Promoting Interoperability PROGRAMS

## PAYMENT ADJUSTMENTS & HARDSHIP EXCEPTIONS TABLE FROM 2017 THROUGH 2020

As part of the American Recovery and Reinvestment Act of 2009 (ARRA), Congress mandated that downward payment adjustments must be applied under the Medicare Promoting Interoperability Program for eligible hospitals and critical access hospitals (CAHs) that are not meaningful users of certified electronic health record technology (CEHRT).

If a health care provider is an eligible hospital or CAH as defined for the Medicare Promoting Interoperability Program, they must demonstrate meaningful use of their CEHRT each year to avoid a downward payment adjustment.

Health care providers who are only eligible to participate in the Medicaid Promoting Interoperability Program are not subject to downward payment adjustments.

Medicare downward payment adjustments for eligible hospitals and CAHs began in 2015. Eligible hospitals and CAHs are able to apply for hardship exceptions to avoid these downward payment adjustments. Hardship exceptions will be granted only under specific circumstances and subject to annual renewal, and only if CMS determines that health care providers have demonstrated that a significant hardship exists. In no case will a hardship exception be granted for more than five years.

The table on the next page outlines the payment adjustment years and hardship exception application deadlines based on a health care provider's years of participation from 2017 through 2020.



Reporting Year	Provider Type	Hardship Exception Application Deadline	Payment Adjustment Year
2017	Eligible Professional (first year)	October 1, 2017	2018
	Eligible Hospital (first year)	July 1, 2018	2018 and 2019
	Eligible Hospital (returning)	July 1, 2018	2019
	Critical Access Hospital	November 30, 2018	2017
2018	Eligible Hospital (first year)	July 01, 2019	2019 and 2020
	Eligible Hospital (returning)	July 01, 2019	2020
	Critical Access Hospital	December 2, 2019	2018
2019	Eligible Hospital (first year)	July 1, 2020	2020 and 2021
	Eligible Hospital (returning)	July 1, 2020	2021
	Critical Access Hospital	November 30, 2020	2019
2020	Eligible Hospital (first year)	July 1, 2021	2021 and 2022
	Eligible Hospital (returning)	July 1, 2021	2022
	Critical Access Hospital	November 30, 2021	2020

