



## April 19, 2024: Medicare Payment Reform Advocacy Update

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### AMA leads effort calling on CMS to reverse CEHRT utilization changes for ACO/APM participants

On April 10, the AMA sent a letter (PDF) to the Centers for Medicare & Medicaid Services (CMS) with the support of more than three dozen national physician and health care organizations, and more than 100 Accountable Care Organizations (ACOs), hospitals and health systems from across the country asking CMS to rescind recently finalized changes to Certified EHR Technology (CEHRT) utilization requirements for physician practice participants in ACOs and other Advanced Alternative Payment Models (APMs).

The first policy requires that all MSSP participants, regardless of APM Qualified Participant (QP) status or track, report Merit-based Incentive Payment System (MIPS) Promoting Interoperability (PI) data starting with the 2025 performance year. The second policy updates the CEHRT use criterion for all Advanced APMs from 75% to “all” eligible clinicians, also starting next year.

In the letter, the AMA takes serious issue with the precedent of requiring QPs in Advanced APMs to report MIPS data, underscoring in detail concerns that both policies will add additional burden on physician practices, deter adoption and utilization of CEHRT, and negatively impact physician participation in ACOs and other Advanced APMs, with a disproportionate impact on small practices. The letter calls on CMS to reverse the changes and instead leverage data already being collected directly from certified health IT developers through the Office of the National Coordinator for Health IT (ONC) coupled with yes/no attestations to demonstrate utilization of CEHRT by physicians who participate in APMs, while minimizing burden. At a minimum, the letter urges CMS to delay both policies and finalize additional flexibilities to mitigate unintended consequences including increased burden and declines in APM participation.

### More articles in this issue

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