NEW CERTIFIED EHR TECHNOLOGY (CEHRT) ATTESTATION REQUIREMENT FOR ACOs

In 2019, CMS will move to an annual attestation requirement for Medicare Shared Savings Program (MSSP) ACOs to prove that they are using Certified EHR Technology (CEHRT). Previously, CMS measured an ACO's CEHRT use through the quality measure ACO-11, Percentage of Eligible Clinicians (ECs) Using CEHRT. This quality measure was double-weighted and also allowed ACOs to meet certain Alternative Payment Model (APM) requirements stipulated by the Quality Payment Program (QPP). In absence of ACO-11, CMS will now require ACOs to certify during an annual certification process that a certain percentage of EC, as defined by the Merit-Based Incentive Payment System (MIPS), participating in the ACO are using 2015 edition CEHRT.

ACO CEHRT Requirements for 2019

- For 2019, MSSP ACOs in Track 1 and Levels A, B, C, & D of the Basic track are MIPS APMs and must certify that 50 percent of their ECs use 2015 edition of CEHRT.

- MSSP ACOs in Tracks 2 and 3, the Track 1+ Model, Level E of the Basic track, and the Enhanced track are Advanced APMs and must certify that 75 percent of their ECs use 2015 edition of CEHRT.

ACOs that extended their agreement to June 30, 2019, will certify in the spring of 2019 via the ACO-Management System (MS). ACOs with a December 31, 2019 contract end date will certify in the fall of 2019 via the ACO-MS. Please note that ACOs participating in both 6-month performance periods in 2019 will certify twice.

More information about how and when to certify will be forthcoming as part of the new annual certification process. CMS notes that if an ACO cannot certify it has met the threshold, CMS reserves the right to monitor, assess and/or audit an ACO's compliance with respect to its certification of CEHRT usage among its clinicians. This information was last provided to ACOs in the ACO Spotlight Newsletter, Issue 2, Jan. 2, 2019.

For more information regarding CEHRT requirements stipulated by the QPP, please refer to our ACO Guide to MACRA.