

Understanding CEHRT Requirements for ACO REACH and the Shared Savings Program

As ACOs race to meet the increasing thresholds for CEHRT Compliance in Performance Year 2025, it is becoming more crucial to understand exactly what requirements your ACO must meet and how to monitor for compliance.

MSSP CEHRT Requirements

For performance years beginning on or after January 1, 2025, an ACO participant, ACO provider/supplier, and ACO professional that is a MIPS eligible clinician, Qualifying APM Participant (QP), or Partial Qualifying APM Participant (Partial QP) (each as defined at [§ 414.1305](#)) must satisfy all of the following:

- (1) Report the MIPS Promoting Interoperability performance category measures and requirements to MIPS according to [42 CFR part 414 subpart O](#) at the individual, group, virtual group, or APM entity level.
- (2) Earn a performance category score for the MIPS Promoting Interoperability performance category at the individual, group, virtual group, or APM entity level.

Most ACOs complete reporting on behalf of their Participants, though you should confirm this with your leadership prior to any deadlines.

REACH CEHRT Requirements

Under the ACO REACH Model Participation Agreement, the ACO and its Participant Providers are required to use CEHRT, as defined under 42 CFR §414.1305, in a manner sufficient to meet the applicable requirements of 42 CFR 414.1415(a)(1), including any amendments thereto. §414.1415(a)(1) merely requires the use of CEHRT as defined under §414.1305.

Following the regulatory citations leads to a definition of CEHRT as EHR technology (which could include multiple technologies) certified under the ONC Health IT Certification Program that meets—

- (i) The 2015 Edition Base EHR definition, or subsequent Base EHR definition (as defined in [45 CFR 170.102](#)); and
- (ii) Any such ONC health IT [certification](#) criteria adopted or updated in [45 CFR 170.315](#) that are determined applicable for the [APM](#), for the year, considering factors such as clinical practice [area](#), promotion of interoperability, relevance to reporting on applicable quality measures, clinical care delivery objectives of the [APM](#), or any other factor relevant to

documenting and communicating clinical care to patients or their health care providers in the APM.

Has been certified to the certification criteria adopted by the Secretary in—

- (i) Section 170.315(a)(1), (2), or (3); (a)(5) and (14), (b)(1), (c)(1), and (g)(7), (9), (10); and (h)(1) or (2);
- (ii) Section 170.315(a)(9) or (b)(11) for the period up to and including December 31, 2024; and Section 170.315(b)(11) on and after January 1, 2025.

This last section is crucial in determining the organizations' compliance, as detailed below.

Exceptions for CEHRT Compliance Requirements

While the expectation from CMS is that your ACO will have 100% of your participants utilizing CEHRT, there are certain exceptions available to ACOs, including:


- Failure to meet the low volume threshold as defined in [42 CFR § 414.1305](#);
- Qualifies for reweighting of the MIPS Promoting Interoperability performance category to zero percent of the final score, in accordance with 42 CFR [§414/1380\(c\)\(2\)\(i\)](#) for the applicable year; or
- Is an eligible clinician as defined in [42 CFR § 414.1305](#) and is not a MIPS eligible clinician as defined in [42 CFR § 414.1310\(b\)\(2\)](#), provided they cannot be excluded solely on the basis of being a Qualifying APM Participant or a Partial Qualifying APM Participant.

For more information around these exceptions and how to take advantage of them, please see our Memorandum: Utilizing Exceptions for CEHRT Compliance Requirements.


Confirming CEHRT Compliance

In order to determine whether an EMR is compliant with these requirements, you will need to obtain the product name and version number being utilized with the practice. You can then use that to look up the certification status on the Certified Health IT Product List website:

<https://chpl.healthit.gov/#/search>


Certified HealthIT | **PRODUCT LIST**


[Home](#)
[Search CHPLQ](#)
[CMS ID Creator](#)
[Compare Products](#)
[CHPL Resources](#)
[Shortcuts](#)

ADMINISTRATOR LOGIN 


Welcome to the Certified Health IT Product List

The Certified Health IT Product List (CHPL) is a comprehensive and authoritative listing of all certified health information technology that have been successfully tested and certified by the ONC Health IT Certification program

If the EMR version you enter is not found, then it is not certified and the system is not compliant with our requirements.


Certified HealthIT | **PRODUCT LIST**

[Home](#)
[Search CHPLQ](#)
[CMS ID Creator](#)
[Compare Products](#)
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ADMINISTRATOR LOGIN 

CHPL Listings

Please note that only active and suspended listings are shown by default. Use the Certification Status filter to display retired, withdrawn, or terminated listings.

FILTERS APPLIED:
Certification Status
Active
Suspended by ONC
Suspended by ONC-ACB
ONC-ACB
Drummond Group
Leidos
SLI Compliance

SEARCH RESULTS: No results found

If the product is found and shown as certified, you will need to conduct additional review to confirm all requirements are met.

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Please note that only active and suspended listings are shown by default. Use the Certification Status filter to display retired, withdrawn, or terminated listings.

FILTERS APPLIED:
Certification Status
Active
Suspended by ONC
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ONC-ACB
Drummond Group
Leidos
SLI Compliance

SEARCH RESULTS: (1-6 of 6 Results)

CHPL ID	Developer ↑	Product	Version	Certification Date	Status ⓘ	
15.04.04.2880.Athe.IN.09.1.230317	athenahealth, Inc.	athenaClinicals for Hospitals and Health Systems	23	Mar 17, 2023	✓	<input type="button" value="COMPARE +"/> <input type="button" value="CERT ID +"/>
15.04.04.2880.Athe.AM.10.1.240419	athenahealth, Inc.	athenaClinicals	v24	Apr 19, 2024	✓	<input type="button" value="COMPARE +"/> <input type="button" value="CERT ID +"/>

Clicking on the CHPL ID link will take you to a screen with the details for certification related to that version, including a list of the certification criteria the certification criteria adopted by the Secretary in Section 170.315 and whether the product passed that element.

LISTING INFORMATION

CERTIFICATION CRITERIA

CLINICAL QUALITY MEASURES

SAFETY ENHANCED DESIGN (SED)

G1/G2 MEASURES

COMPLIANCE ACTIVITIES

ADDITIONAL INFORMATION

Want Updates?
 Keep up-to-date with significant changes to this Listing on the CHPL

Certification Criteria
☐ SEE ALL CERTIFICATION CRITERIA (41 found)

✓ 170.315 (a)(1)	Computerized Provider Order Entry (CPOE) - Medications	Show Details
✓ 170.315 (a)(2)	CPOE - Laboratory	Show Details
✓ 170.315 (a)(3)	CPOE - Diagnostic Imaging	Show Details
✓ 170.315 (a)(4)	Drug-Drug, Drug-Allergy Interaction Checks for CPOE	Show Details
✓ 170.315 (a)(5)	Demographics	Show Details
✓ 170.315 (a)(12)	Family Health History	Show Details
✓ 170.315 (a)(14)	Implantable Device List	Show Details
✓ 170.315 (a)(15)	Social, Psychological, and Behavioral Determinants Data	Show Details
✓ 170.315 (b)(1)	Transitions of Care	Show Details
✓ 170.315 (b)(2)	Clinical Information Reconciliation and Incorporation	Show Details
✓ 170.315 (b)(3)	Electronic Prescribing	Show Details
✓ 170.315 (b)(9)	Care Plan	Show Details
✓ 170.315 (b)(10)	Electronic Health Information Export	Show Details

To ensure compliance, you must confirm that each of the following requirements from Section 170.315 are listed as compliant:

- (a)(1), (2), or (3)
- (a)(5)
- (a)(14)
- (b)(1)
- (b)(11)
- (c)(1)
- (g)(7)
- (g)(9)
- (g)(10)
- (h)(1) **or** (2)

You can also switch the toggle in the top right corner of this section to view the sections for which the product is **not** certified. Non-Compliant sections will be shown in grey.

Certification Criteria

 SEE ALL CERTIFICATION CRITERIA (41 found)

✓ 170.315 (a)(1)	Computerized Provider Order Entry (CPOE) - Medications	Show Details ✓
✓ 170.315 (a)(2)	CPOE - Laboratory	Show Details ✓
✓ 170.315 (a)(3)	CPOE - Diagnostic Imaging	Show Details ✓
✓ 170.315 (a)(4)	Drug-Drug, Drug-Allergy Interaction Checks for CPOE	Show Details ✓
✓ 170.315 (a)(5)	Demographics	Show Details ✓
✓ 170.315 (a)(12)	Family Health History	Show Details ✓
✓ 170.315 (a)(14)	Implantable Device List	Show Details ✓
✓ 170.315 (a)(15)	Social, Psychological, and Behavioral Determinants Data	Show Details ✓
✓ 170.315 (b)(1)	Transitions of Care	Show Details ✓
✓ 170.315 (b)(2)	Clinical Information Reconciliation and Incorporation	Show Details ✓
✓ 170.315 (b)(3)	Electronic Prescribing	Show Details ✓
170.315 (b)(7)	Security Tags - Summary of Care - Send	
170.315 (b)(8)	Security Tags - Summary of Care - Receive	
✓ 170.315 (b)(9)	Care Plan	Show Details ✓

If all required sections are shown as compliant, then the system meets all requirements.