

Understanding CEHRT Requirements for ACO REACH & 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.



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, more details follow.



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.

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.

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

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Confirming CEHRT Compliance

Having an “active” Certification status for the EHR Product on the CHPL website does not guarantee the product meets the CEHRT Requirements.

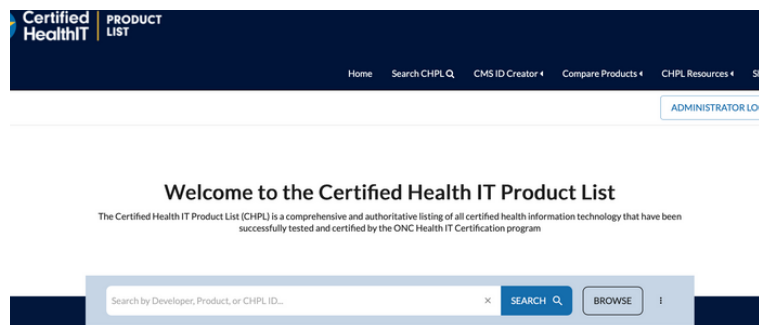
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Using the CHPL website to determine certification:

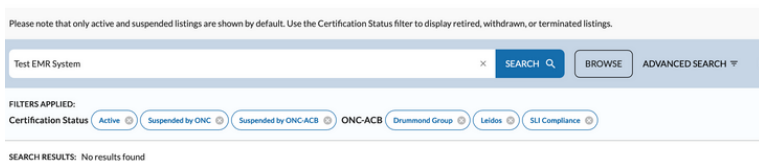
In order to determine whether an EMR is compliant with these requirements, you will need to obtain the product name and version number being utilized with the practice. You can then use that to look up the certification status on the Certified Health IT Product List website:

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



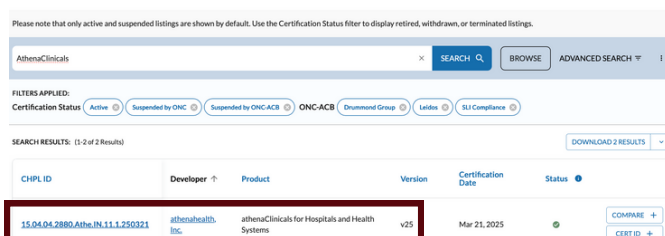
If the EMR version you enter is not found, then it is not certified, and the system is not compliant with our requirements.

CHPL Listings



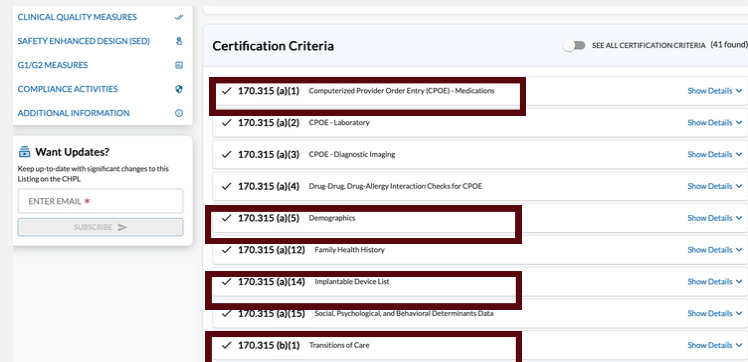
If the product is found and shown as certified, you will need to conduct additional review to confirm all requirements are met.

CHPL Listings



Continued:

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.



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.

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

