TouchWorks® EHR Regulatory Rally Series September 2025 Key Takeaways

At Altera, we are committed to keeping our clients informed of all TouchWorks® EHR updates, including all things regulatory. If you missed our September 2025 Regulatory Rally webinar, you can access the recording **here**.

Our regulatory webinars aim to enhance our communication and provide essential information for your planning needs. We hope the recent session was insightful and addressed your questions. **We are in this together!**

To ensure full benefit from the session, we have prepared a concise summary of key takeaways and actionable steps. Reviewing these insights will help you stay ahead in leveraging our solutions for your success. Thank you for your continued partnership and commitment to excellence.

Critical deadlines – Mark your calendar!

ACTION Required

Action Required	Deadline	Impact
Comment on 2026 Medicare Proposed Rule	Sept 12, 2025 @ 5:00PM	Affects 2026 incentive programs
Submit Support Case for CEHRT Hotfix	Last day of your 2025 performance period	Required for compliance
Schedule 2026 TouchWorks Upgrade	Contact Client Success Executive for Q1 2026 slots	Avoid last-minute bottlenecks

Regulatory Landscape Update

HTI-4 Final Rule (Effective July 31, 2025)

- **What it means:** New requirements for electronic prescribing, prescription benefits, and prior authorization.

THREE KEY CHANGES:

1. **Electronic prescribing standard update**
   - **New Requirement**: NCPDP SCRIPT standard version 2023011
   - **Deadline**: Jan 1, 2028 (aligns with Medicare Part D)
   - **Impact**: All electronic prescribing must use updated standard

2. **Real-time prescription benefits**

- **New requirement:** enhanced real-time prescription benefits
- **Deadlines:**
  - ASTP/ONC criteria: on Jan 1, 2028.
  - CMS Part D: Jan 1, 2027.
- **Impact**: New criteria required for Base EHR certification

3. **Electronic prior authorization**
   - **New requirement:** adopts new API standards based on FHIR and HL7 Da Vinci project.
   - **Deadline:** pending
   - **Impact**: new criteria for both Health IT and Payers

2026 Quality Payment Program Proposed Rule Updates

- **What's new:** Reviewed key highlights from the 2026 Quality Payment Program proposed rule for MIPS, MIPS Value Pathways and the new Ambulatory Specialty Model (ASM).
- **Resources**: 2026 PFS|QPP Proposed Rule Fact Sheet and Policy Comparison

System Updates and Compliance

TouchWorks CEHRT Compliance – ACTION Required

- **CRITICAL:** TouchWorks requires a hotfix for 2025 compliance due to a CCDA narrative text issue via API generation.
- **What you need to do:**
  1. **Submit a Support Case** to request your hotfix.
  2. **Verify your production environment** is upgraded to the correct version.
  3. **Complete hotfix upgrade** by the last day of your 2025 Promoting Interoperability performance period.

Regulatory Compliance Reminders

2024.3+	2025.3	2025.4	Key Compliance Takeaways
2025 Reporting *Hotfix Required* **2024.3.4 2025.1.4 2025.2.2**	**2025 Reporting** *Hotfix Required* **2025.3.1**	**2025 Reporting** *Included*	**2025 Reporting** If on a version prior to 2025.4, HF is required **by 12/31/2025 or by end of your reporting period.**
	2026 Reporting *Requires* **Supplemental FHIR Update**	**2026 Reporting** *Requires* **Supplemental FHIR Update**	**2026 Reporting** Upgrade to 2025.3.1 + **Supplemental FHIR Update** is required before the **first** day of your 2026 reporting period.

CHPL Certification Simplification

- **Good news:** Finding your EHR Certification number just got easier!
- **What changed:**
  - **Old way**: Multiple dot versions to choose from
  - **New way:** Single primary version option covers all dot versions.
  - **Where to find it:** TouchWorks 2025 is now available on the [CHPL website](#)
  - **Impact:** We will continue to communicate what the minimum CEHRT version is each year, but clients will only need to select the primary version to place in their "cart" to obtain their EHR Certification ID number.

FHIR R4 Endpoint Monitoring

- **HHS Enforcement Alert**
- **Breaking:** [HHS announces crackdown on health data blocking](#) the U.S. Department of Health and Human Services (HHS) announced that Secretary Robert F. Kennedy, Jr. has directed HHS to increase resources dedicated to curbing the harmful practice of information blocking. HHS will take an active enforcement stance against health care entities that restrict patients' engagement in their care by blocking the access, exchange, and use of electronic health information.
- **What this means for you:**
  - FHIR R4 "patient" endpoints must be **always accessible**
  - Active monitoring is **not optional**
  - Quick issue resolution **is critical**
- **Action steps:**
  - Implement and maintain monitoring process for your endpoints
  - Fix issues immediately when detected
  - Submit a Support case if you need assistance
  - *Remember: We are in this together!*

Altera Separation Updates

Completed Migrations

- **CDS/Subscription Manager**
  - **Access:** Use TouchWorks "CDS Console" single sign-on
  - **Important:** Stop using Veradigm Subscription Manager
- **FHIR and License Management Portal**
  - **Access:** [Altera LMP](#)
  - **Important:** Thank you to all clients for your assistance and coordination with our efforts!

In Progress Migrations

- **Unity and ACDM (Direct Messaging)**
  - **What to expect:** Proactive Support cases coming
  - **Your part:** Respond quickly to coordinate with technicians
  - **Timing:** Testing during business hours, production updates after hours

Planning for 2026

- **Required System Version**: TouchWorks v2025.3.1 + FHIR Supplemental Update
- **What's included:**
  - USCDI v3 support
  - Social Determinants of Health (SDOH) capabilities
  - Insight Measures support

UPGRADE DEADLINES BY PROGRAM TYPE

Program Type	Upgrade Deadline	Notes
Promoting Interoperability	First day of 180-day reporting period OR July 5, 2026	Whichever comes first
eCQMs Only	Last day of performance period OR Dec 31, 2026	More flexibility
ACO/Medicare Shared Savings	Verify with ACO Administrators	Requirements may vary

- **ACTION:** Contact your Client Success Executive (CSE) now to schedule your upgrade!

Special Updates

- **Electronic Case Reporting (eCR)**
  - **Status update:** CDC paused EHR vendor beta testing and general onboarding in June but plans to restart soon with new process.
  - **2025 impact:** CMS proposed to suppress the Electronic Case Reporting measure for 2025 performance year.
  - **Important:** You still must submit a data submission response (No/Yes/Exclusion) to receive your Promoting Interoperability score.

- **Windows End of Life - Oct. 14, 2025**
  - **HIPAA Reminder:** using outdated or unsupported systems may violate compliance requirements.
  - **Action:** Ensure your organization is prepared!

MIPS Value Pathways (MVP) Update

New VCRS V25.3 Features

- **Released**: Aug 8, 2025
- **What's New:** All 2025 reporting requirements are now available in the MVP Estimator Dashboards
- **Available MVPs**

#	MVP Name	Status
1	Complete Ophthalmologic Care	**NEW!**
2	Advancing Cancer Care	**NEW!**
3	Gastroenterology	**NEW!**
4	Value in Primary Care	Available
5	Focusing on Women's Health	Available
6	Advancing Care for Heart Disease	Available
7	Optimal Care for Kidney Health	Available
8	Prevention and Treatment of Infectious Disorders	Available
9	Quality Care in Mental Health	Available

- **Cost:** Existing MIPS Estimator license holders get MVP Dashboards at no additional cost
- **Getting Started:** Submit a Support Case to request dashboard activation or a contract quote.
- **Helpful CMS Resources**
  - Learn about MVP Registration
  - Understanding MIPS Value Pathways (MVPs)
  - Explore MVPs
  - 2025 MVP Implementation Guide

Quality Reporting (QRDA) Export

- **Two Export Types Available:**

  - **QRDA 1** – Patient-level Data
    - Contains patient PHI
    - Very large zip files
    - Use for: Data registries, third-part data transfers

  - **QRDA 3** – Summary Data
    - No Patient PHI
    - Smaller files
    - Use for: MIPS/MVP and other Medicare incentive program data submissions

Access: Available through VCRS Reporting Dashboards for independent export

Professional Services

- **MIPS/MVP Submission Consulting:**
- **Our experts provide:**
  - Submission readiness checklist and review
  - Regulatory expertise for MIPS and MVP programs
  - Guidance and oversight of VCRS Dashboards for QRDA-3 file generation
  - Real-time consulting support during client QPP self-submission
  - Data review to help identify and resolve submission issues
- **Training available**
  - Supplemental VCRS Reporting Platform training
  - QRDA Administration training for new team members
- **Contact:** Your Client Success Team for more information

Contact and Stay Connected

- **Questions or Need Clarification?**
  - Contact your Client Success Team Member

- **Haven't Completed Our Survey?**
  - The survey focuses on getting your feedback on which topics we should be covering in depth, what content is useful versus not useful, and exploring what other ways you would like to hear from us. If you have not yet completed the survey, please take a moment to do so: **TouchWorks EHR Webinar Survey**

STAY CONNECTED

- Watch for upcoming webinar and regulatory updates. Our next Regulatory Rally Webinar is on **December 11, 2025**