TouchWorks® EHR Regulatory Rally Series March 2025

Bringing next-level healthcare within reach

TouchWorks Regulatory Team

© 2025 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

Housekeeping

Recorded session, listening-only mode, lines are muted by default

Ask questions via Q&A panel or ‘Raise your hand’ option to ask questions live

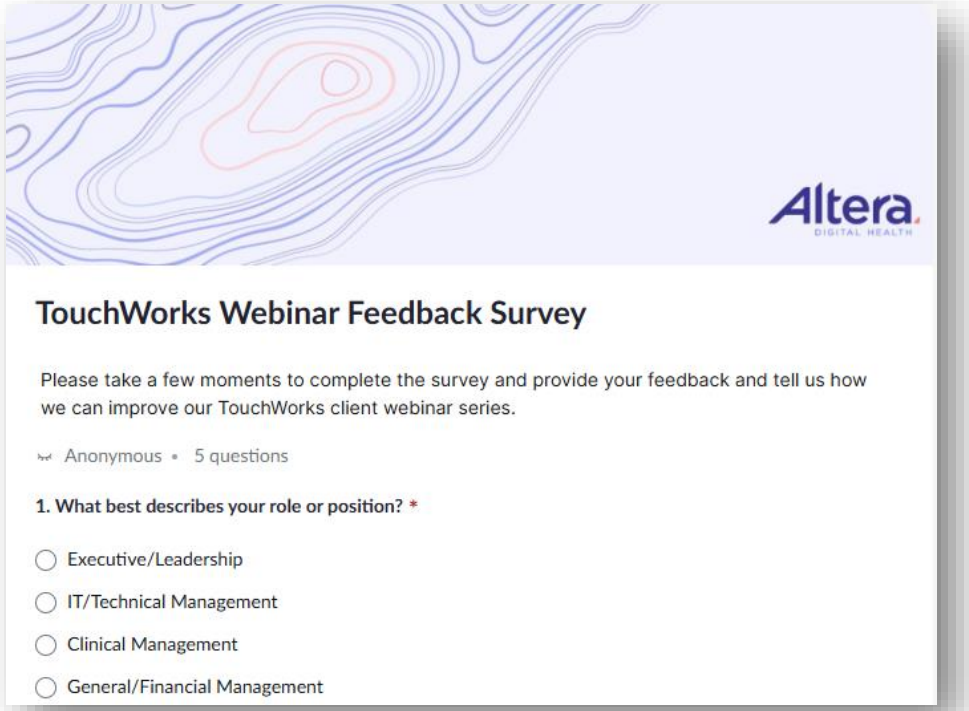
Switch to full screen to maximize your view and optimize your virtual experience

Watch for a follow-up email containing the webinar recording or visit our webinar page

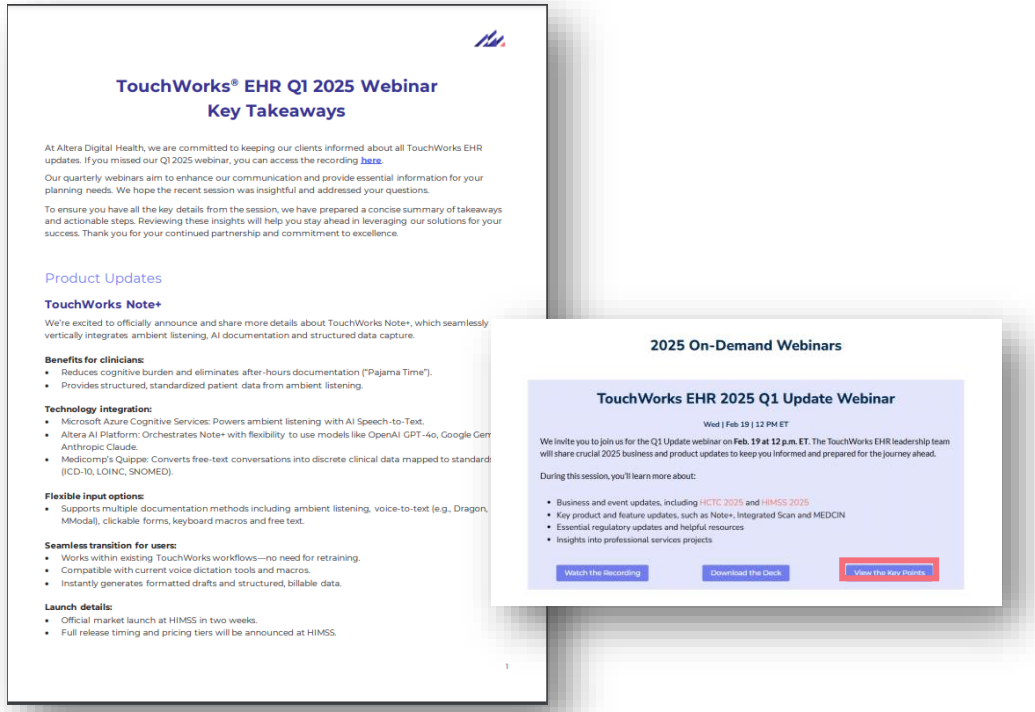
© 2024 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

Improving Client Communication

Client Survey



Webinar 'Key Points' Document



© 2025 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

go.alterahealth.com/2025touchworksclientseries

First, a word

The information contained within this presentation is intended for informational purposes only. While the information and recommendations presented in this presentation are good-faith interpretations made by Altera Digital Health based on the publicly available information referenced within, it does not constitute legal advice or guidance. Thus, any decisions, and associated risks, made by the client pertaining to the information within this presentation are solely the responsibility and liability of the client. Clients are strongly advised that such decisions be made in consultation with their legal representatives.

The information presented within this presentation (1) should not be considered complete, exhaustive, or customized to an individual client's needs; and (2) is subject to change due to new laws, regulations, or Department of Health and Human Services policies.

This presentation neither modifies any signed agreements Altera has with the client nor creates any Altera attestations, representations, warranties, guarantees or covenants related to ONC and CMS regulations whether Altera EHR software will meet new or modified requirements for certified EHR technology, or for any other matter.

© 2025 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

Agenda

March 20, 2025

01 *2025 Regulatory Reporting*
2025 MIPS/MVP Final Rule Highlights
VCRS Release Highlights

02 FHIR, FHIR, FHIR
Monitoring Endpoint Accessibility

03 HTI Updates
USCDI v3 & More

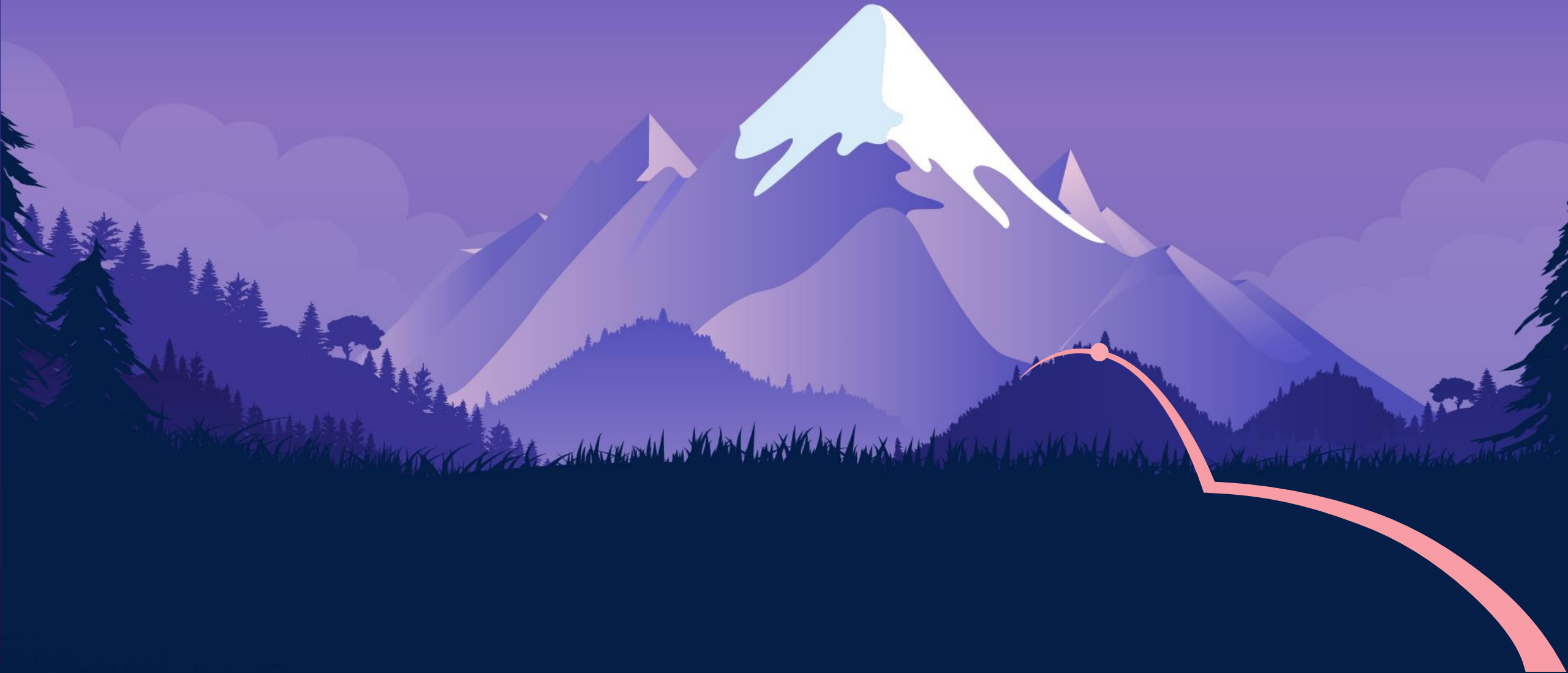
04 Live Q&A and Survey

© 2025 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

go.alterahealth.com/2025touchworksclientseries

TouchWorks EHR:

2025 Regulatory Reporting



TouchWorks 2024.3 – A quick reminder!

Performing for Promoting Interoperability?

- Must have upgraded to TouchWorks Version 2024.3 or higher (with FHIR R4 version 24.5 or higher) installed, by the first day of your 180-day performance period or no later than July 4, 2025

Reporting on eCQMs but not Promoting Interoperability?

- Must have upgraded to TouchWorks Version 2024.3 or higher (with FHIR R4 version 24.5 or higher) installed, by the last day of the performance period; no later than Dec 31, 2025

ACO or Medicare Shared Savings Program Participants

- Verify **your CHERT requirement deadlines** with ACO Administrators**.**

2025 Quality Payment Program Final Rule Highlights

- Overall analysis – Traditional MIPS and MVP programs had minimal changes

- Many areas remained the same with no change:
  - Neutral adjustment threshold remains at 75 points
  - Eligible Clinician Type definitions
  - Minimum performance periods
  - Performance category weights

- Adopted minimum data submission criteria for each performance category
  - Quality – requires at least one measure that must include both a numerator and denominator
  - IA – requires at least one activity with a “yes” response
  - PI – all required elements for this category must be submitted

2025 Quality Payment Program Final Rule Highlights by Category

- Quality Category
  - Complete removal of CMS 249 – Appropriate Use of DXA Scans in Women…
  - Maintains data completeness criteria at 75% for 2025 and 2026 and extends it through 2027 and 2028 performance years
  - Adds new APP Plus measure set for ACO and APM reporters; required for Shared Savings participants
- Improvement Activities
  - Removes scoring weights of high and medium
  - Instead, requires a specific number of activities to be submitted
    - Individuals and Groups submit 2 activities
    - Special statuses (small practice, rural, etc.) submit 1 activity
    - Submission of the above still equals 40 points or 100% category rate
- Promoting Interoperability Category
  - No changes

2025 Quality Payment Program Final Rule Highlights

- MIPS Value Pathways
  - No longer require participant to select one population health measure as part of the MVP registration process
  - Improvement Activities - as with traditional MIPS, activity weights have been removed
    - Clinicians, groups and subgroups (regardless of special status) must attest to one activity
  - 5 new MVP's added relevant to ambulatory clinicians
  - 2 neurology-focused MVPs combined into a single neurological MVP
    - Quality Care for Patients with Neurological Conditions

New MVPs added:

1. Complete Ophthalmologic Care
2. Gastroenterology Care
3. Optimal Care for Patients with Urologic Conditions
4. Dermatology Care
5. Pulmonology Care

**TouchWorks is assessing addition of the new MVP's into VCRS Dashboard*

New Improvement Activities Finalized for 2025

Activity (NEW)	ID	Subcategory
Implementation of Protocols and Provision of Resources to Increase Lung Cancer Screening Uptake	IA_PM_24	Population Management
Save a Million Hearts: Standardization of Approach to Screening and Treatment for Cardiovascular Disease Risk	IA_PM_25	Population Management

© 2025 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

Removed Activities Finalized for 2025

Activity (To Be Removed)	ID	Subcategory	Weight
Provide 24/7 Access to MIPS Eligible Clinicians or Groups Who Have Real-Time Access to Patient's Medical Record	IA_EPA_1	Expanded Practice Access	High
Population Empanelment	IA_PM_12	Population Management	Medium
Implementation of use of specialist reports back to referring clinician or group to close referral loop	IA_CC_1	Care Coordination	Medium
Implementation of improvements that contribute to more timely communication of test results	IA_CC_2	Care Coordination	Medium
Implementation of a Personal Protective Equipment (PPE) Plan	IA_ERP_4	Emergency Response and Preparedness	Medium
Implementation of a Laboratory Preparedness Plan	IA_ERP_5	Emergency Response and Preparedness	Medium
Electronic Health Record Enhancements for BH data capture	IA_BMH_8	Behavioral and Mental Health	Medium
Invasive Procedure or Surgery Anticoagulation Medication Management	IA_PSPA_27	Patient Safety and Practice Assessment	Medium

© 2025 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

Changed Activities Finalized for 2025

Activity (To Be Removed)	ID	Subcategory
Now: Vaccine Achievement for Practice Staff: COVID-19, Influenza, and Hepatitis B Was: COVID-19 Vaccine Achievement for Practice Staff	**Now** IA_PM_26 Was IA_ERP_6	**Now:** Population Health Was: Emergency Response & Preparedness

© 2025 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

Promoting Interoperability Requirements Summary for 2025

COLLECT DATA USING ONC HEALTH IT CERTIFIED VERSION

Deadline to be on applicable certified technology by the FIRST day of your 180-day reporting period

New last "first" day to start is 07/05 of each year

CMS EHR CERTIFICATION NUMBER

Clients obtain from the CHPL Website

https://chpl.healthit.gov/

TouchWorks v2024.3 or higher

ACTIONS TO LIMIT OR RESTRICT INTEROPERABILITY OF CEHRT

Attest "yes"

HIGH PRIORITY PRACTICES SAFER GUIDE

Attest "yes" to having completed requirements within calendar year or by 12/31/25

SECURITY RISK ANALYSIS

Attest "yes" to having completed requirements within calendar year or by 12/31/25

PERFORMANCE & REGISTRY MEASURES

Numerator/denominator measures require at least 1 count for each

Attestation measures must have a valid response or exclusion

© 2025 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

Electronic Case Reporting (eCR) – TouchWorks Update

The 2015 Cures Update Edition mandated the integration of automatic functionalities to facilitate the electronic sharing of health data related to specific diagnoses (trigger codes) with public health authorities.

Example: “Diagnosis = COVID”

- TouchWorks EHR must automatically send this predefined diagnosis information to the state's public health agency.

- States use the data for tracking diseases, taking necessary actions, and more.

5 Phases to achieve CDC Certification

- Phases 1 and 2; achieved ONC Certification, **done!**
- Phase 3, CDC Certification Testing, **done!**
- **We are here!** Phase 4, BETA Testing w/Clients
- Phase 5, “General Availability" (GA) and "Rollout”.

Call Outs

- TouchWorks can only announce "GA" once passing CDC certification process.
- Slow testing response from the CDC has been escalated to CMS, CDC and ONC!

Attestation Reminders for MIPS Promoting Interoperability performers,

- Current regulation requires advancement in 2025 to Option 2 active engagement: Validated Production
- Stay tuned for updates on this requirement!

VCRS 2025 Regulatory Dashboard/MIPS Updates

COMING with VCRS 25.2 release in early April!

- All 2025 date ranges & eCQM logic updates
- Reprocessing of all eCQM measures back to Jan 1, 2025
- Incorporation of 2025 historical benchmarks for MIPS Estimator Quality Dashboard scoring
- New quality measure badging for topped out vs capped measures
- Removal of CMS 249 – DXA Scan measure from PI and MIPS Quality Dashboards
- APP Plus - Addition of CMS 125 – Breast Cancer Screening to APM/ACO/APP Quality Dashboards

Need Help, have new analysts or team members?

Need Assistance, with improving your measure performance or VCRS dashboard training?

TouchWorks Services offers Consulting Subscriptions to assist clients. Contact your Client Success Executive for more information.

NEXT UP! – 2025 MVP Dashboard Updates

VCRS 25.3 release, expected early Q3

MVPs Currently Available

- Value in Primary Care
- Focusing on Women's Health
- Advancing Care for Heart Disease
- Optimal Care for Kidney Health
- Prevention and Treatment of Infectious Disorders
- Quality Care in Mental Health

- Clients with an existing "MIPS Estimator Licenses" will get access to MVP dashboards at no additional cost, enabling self submission
- Submit a Support case to request dashboard activation
- MIPS and MVP consultation and training are included with a TW Consulting Subscription service packages. Contact your Altera Client Success Executive for additional information

TouchWorks EHR:

FHIR, FHIR, FHIR

FHIR and Endpoint Accessibility Monitoring

FHIR Publication and Endpoint Criteria

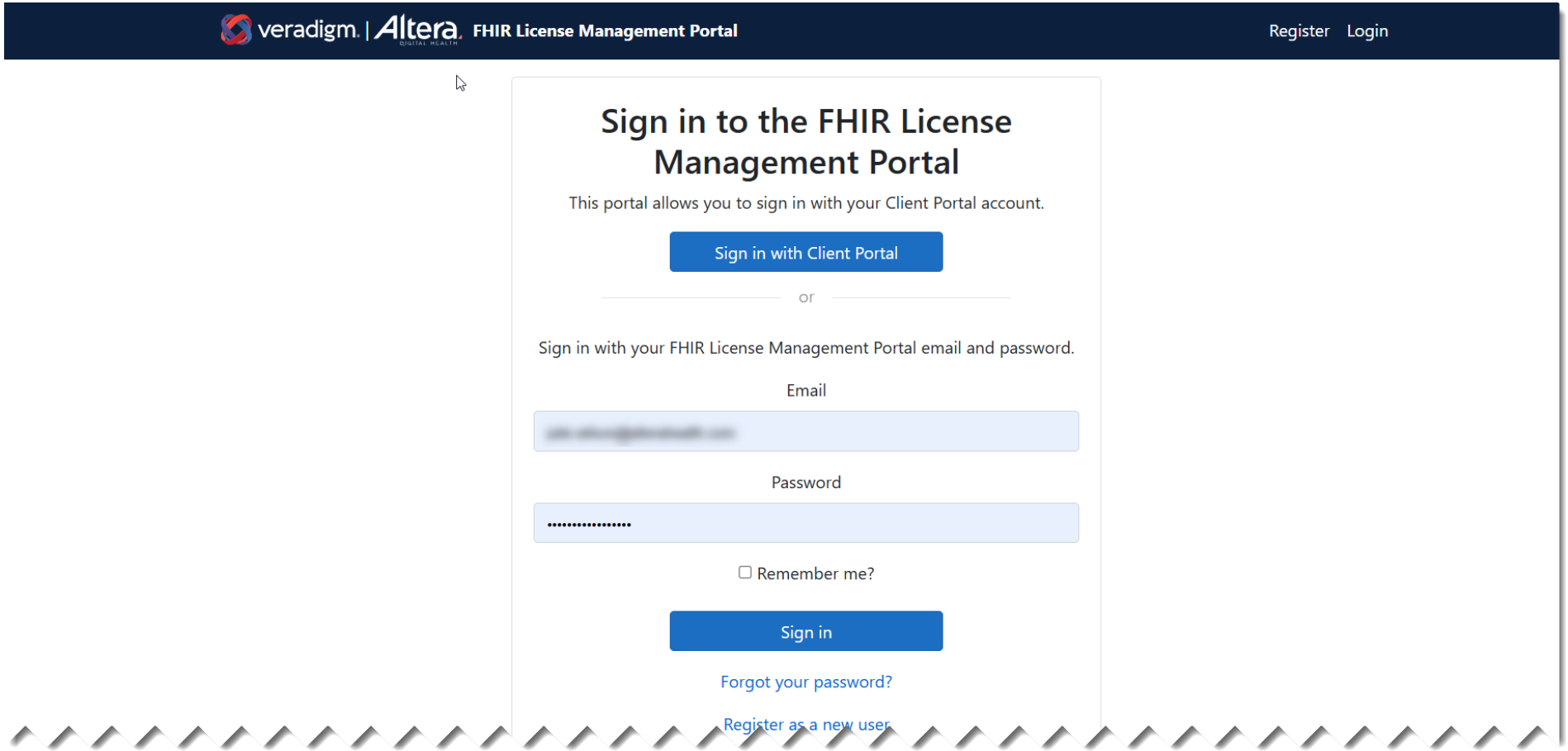
- Must publish patient-facing FHIR endpoint in a standardized format (to ensure consistency across systems) – updates for needed changes met for Jan 1, 2025 deadline – **thank you!**
- Now we need to keep them updated and monitor patient endpoint accessibility
- TouchWorks created a proactive patient endpoint monitoring process
- FHIR License Management Portal (LMP) is the primary tool to manage and monitor FHIR publication content, such as your organization's name, ID numbers, address, contact information and R4 patient endpoint status

> FHIR R4 endpoints are crucial to allow patients access to their own health information, the expectation is for your endpoint to always be accessible…

Client's responsibility … we are in this together!

- Actively monitor your FHIR R4 Endpoints. We all are equally responsible; Information Blocking.
- Verify your organization has a FHIR Endpoint monitoring process
- Includes receiving weekly License Management Portal (LMP) endpoint email alerts!
- If your organization's FHIR endpoint shows down and you need assistance to resolve, submit an Altera Support Case!

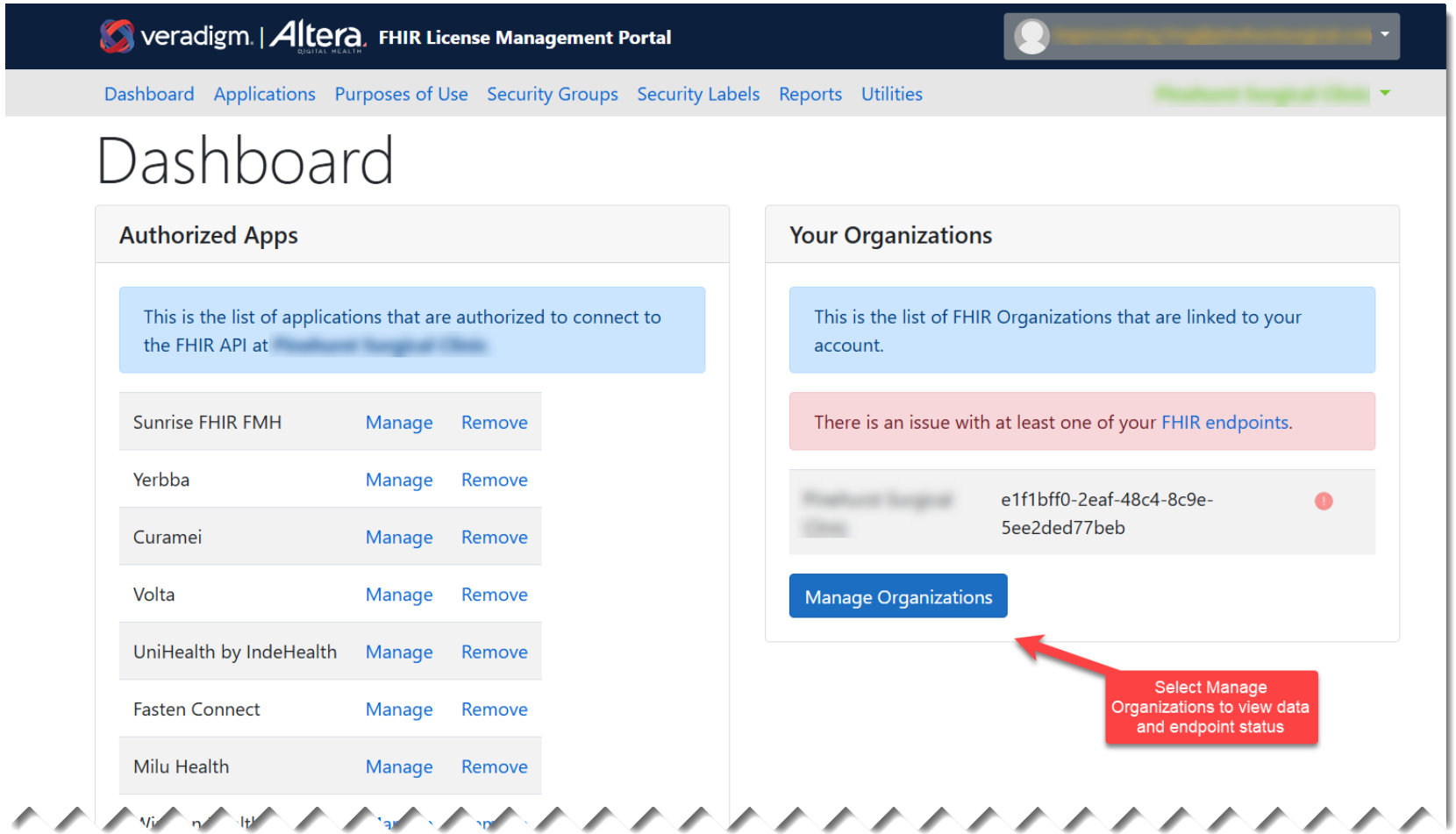
License Management Portal (LMP)… Let's Take a Look



Clients should login using their Client Portal account

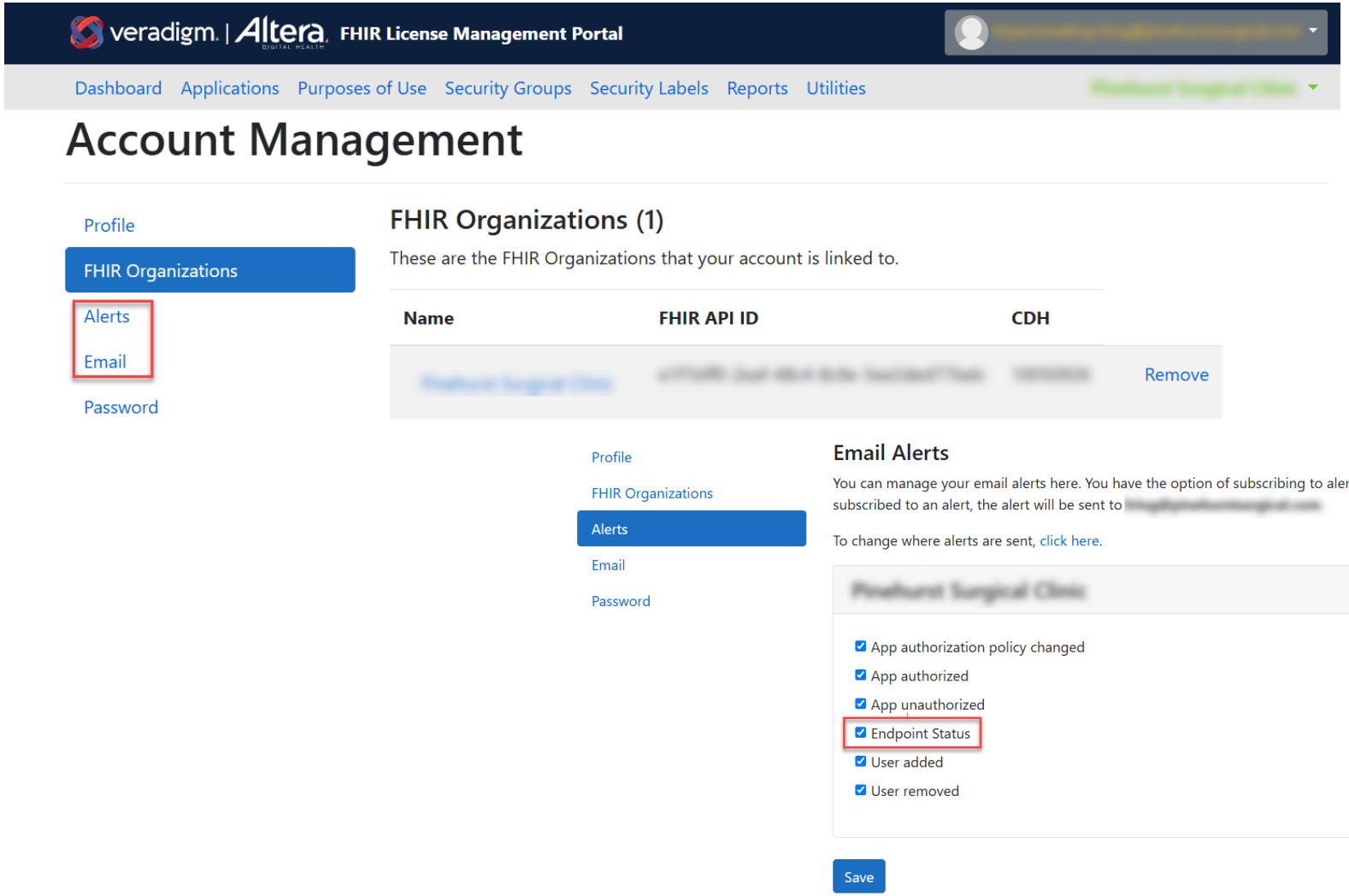
FHIR LMP Login

License Management Portal (LMP)… Let's Take a Look



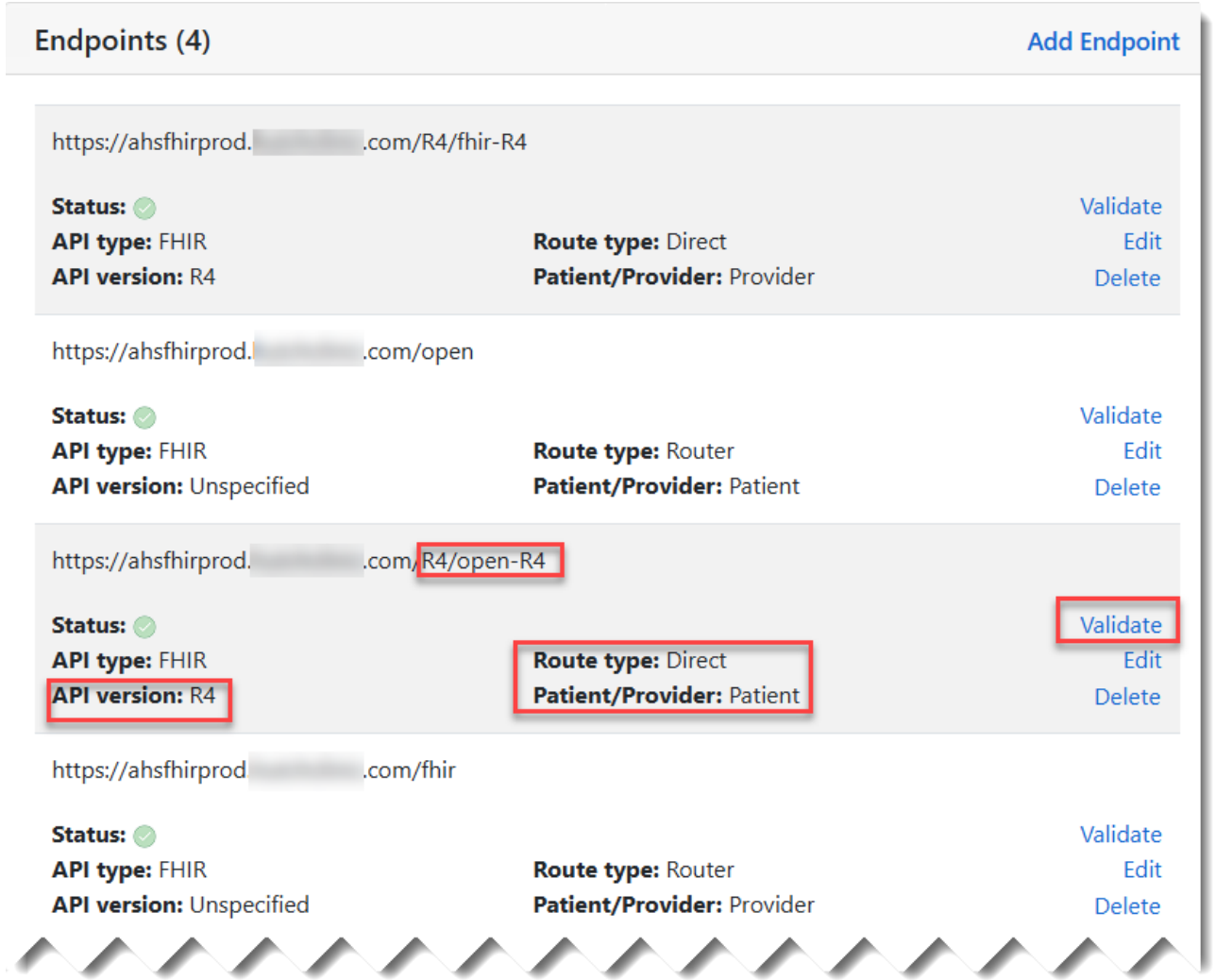
Clients should have at least one admin setup in the LMP that owns FHIR monitoring & maintenance

License Management Portal (LMP)… Let's Take a Look



Easily Manage your Alerts and Email

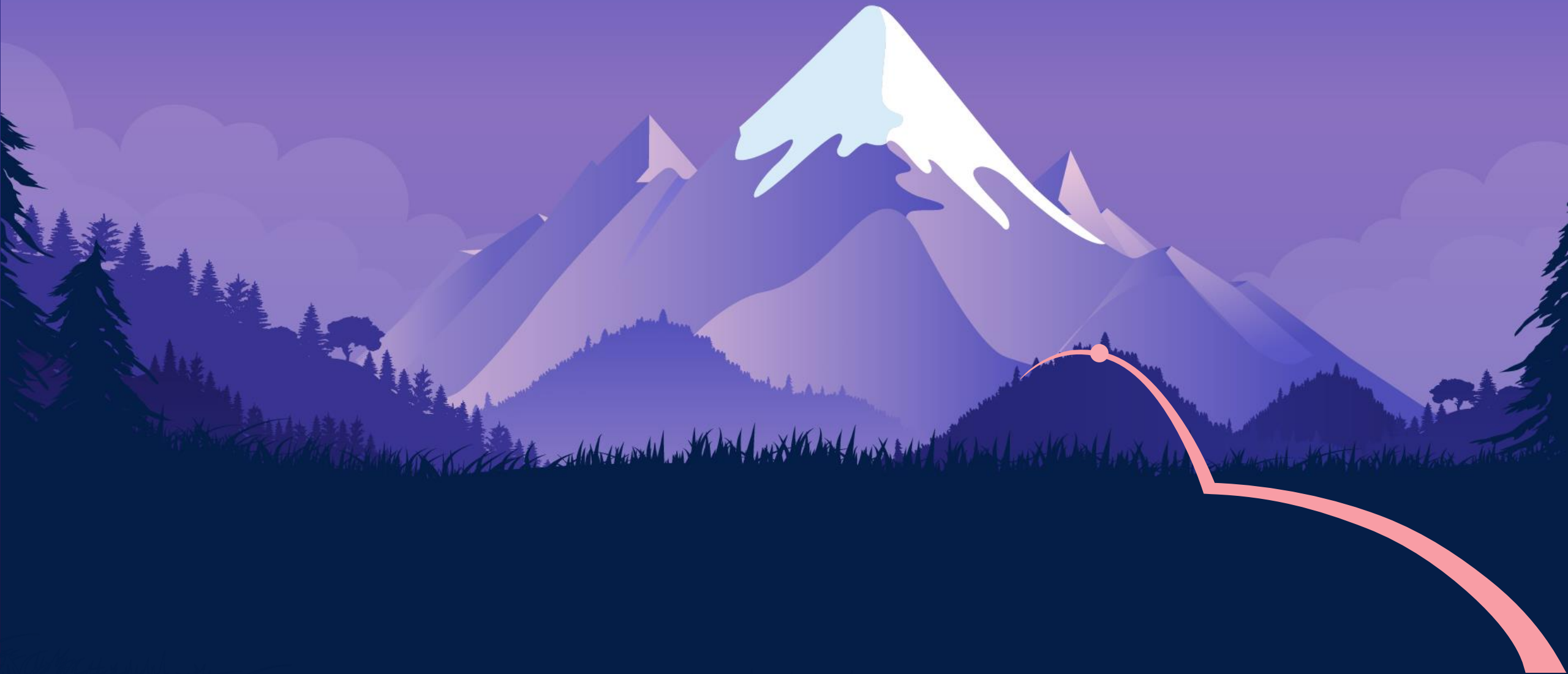
License Management Portal (LMP)… Let's Take a Look



Easily Monitor patient R4 endpoint status

TouchWorks EHR:

HTI Updates & More



Rolling into 2025 with v2025.3, what to expect

- **USCDI Version 3 Updates –** requires many functional changes throughout TouchWorks, heavy lifting!
- **Social Determinants of Health (SDOH) –** requires new feature functionalities / workflows to meet regulatory requirements
- **eCR Updates –** updates to trigger codes, adding more diagnosis for reporting
- **Call Out! Insight Measures –** a vendor requirement only reporting to the ONC on how you use TouchWorks. Data collection starts January 1, 2026.
  - Patient Accessing their EHI
  - FHIR Usages
  - Immunization Administrations

Insight Measures

****

Vendors must make every effort to upgrade clients to the certified version, which includes the Insights functionality, by December 31, 2025…. and every year thereafter.

ONC is aware, vendors can't force clients to upgrade but we are expected to actively encourage clients to upgrade prior to December 1, 2026.

Office of the National Coordinator for Health Information Technology

HTI-1 Key Dates

December 2023

2029

- **Insights Condition Year 4**

- CY 2029: health IT developers collect data for all Insights Condition Measures.
- July 2029, health IT developers submit report for all Insights Condition measures

2028

- **Insights Condition Year 3**

- CY 2028: health IT developers collect data for all Insights Condition measures (Years 1, 2, and 3).
- July 2028, health IT developers submit Insights Condition report for Year 1 and 2 measures.

2027

- **Insights Condition Year 2**

- CY 2027: health IT developers collect data for Insights Condition Years 1 and 2 measures.
- July 2027, health IT developers submit Insights Condition report for Year 1 measures.

2026

- **Insights Condition Year 1**
- **Updated standards compliance**

- Calendar Year (CY) 2026: health IT developers collect data for Insights Condition Year 1 Measures.
- Starting January 1, 2026, all HTI-1 updated standards in certification criteria are solely applicable for compliance purposes.

2025

- **USCDI v3**
- **All other Certifcation Program updates**

- By December 31, 2025, health IT developers must update and provide to their customers certified health IT that conforms to new and revised standards and certification criteria included in the HTI-1 Final Rule.
- Starting January 1, 2025, the decision support interventions certification criterion:
  - Replaces the clinical decision support certification criterion in the Base EHR definition.
  - "Assurances" Maintenance of Certification requirement for decision support interventions begins (170.402(b)(4)).

2024

- **"Decision Support Interventions"**
- **Standardized "FHIR endpoints"**

- By December 31, 2024, developers with health IT certified to the clinical decision support certification criterion adopted at 170.315(a)(9) must:
  - Update their certificate(s) for the decision support interventions certification criterion at 170.315(b)(11) and
  - Provide such certified health IT to customers.
- By December 31, 2024, Certified API Developers must publish their customers' service base URL information (FHIR Endpoints) according to specific adopted standards.

And then, more … HTI-2 & HTI-3 released

- **HTI-2** Final rule focus on TEFCA
- Defines key terms and ensuring compliance with the Information Blocking regulations when utilizing TEFCA mechanisms
- Clarifies “TEFCA Manner Exception” which allows healthcare providers to exchange electronic health information solely through TEFCA without being considered information blocking if certain conditions are met
- Incorporates provisions to support reliability, privacy and security of health information exchanged through the TEFCA framework

- **HTI-3** Final Rule creates a new Information Blocking “Protecting Care Access” exception

Final Rules arrived Dec, 2024

+1200 pages of HTI-2 proposed requirements reduced and delivered through HTI-2 & HTI-3 Final Rules, which become effective on Jan 15, 2025

Your Mission, Our Contributions …. We are in this Together!

Getting Assistance …

TouchWorks Services offers different types of assistance consulting subscriptions; assists with MIPS, MVP, measure performance optimization or SAFER Guide consultation, etc… contact your Altera Client Success Executive.

Discussion Takeaways

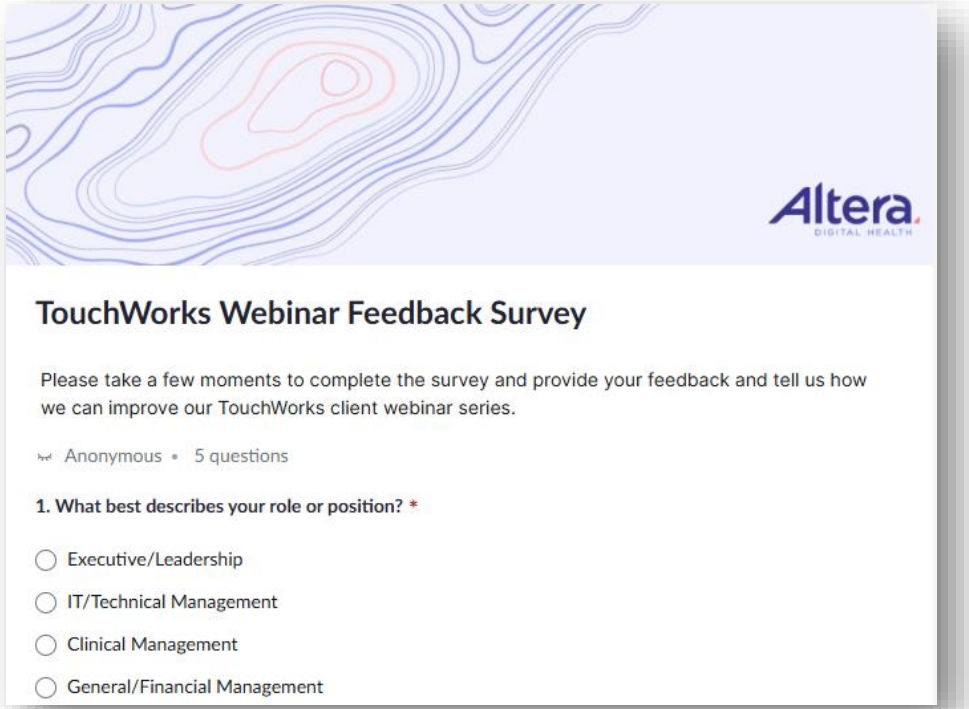
1. 2025 VCRS changes coming soon with version 25.2 and 25.3
2. Monitor your FHIR R4 endpoints (ongoing)
3. Verify you are receiving LMP email alerts
4. Begin monitoring your 2025 regulatory measure performance in April!

QUESTIONS?

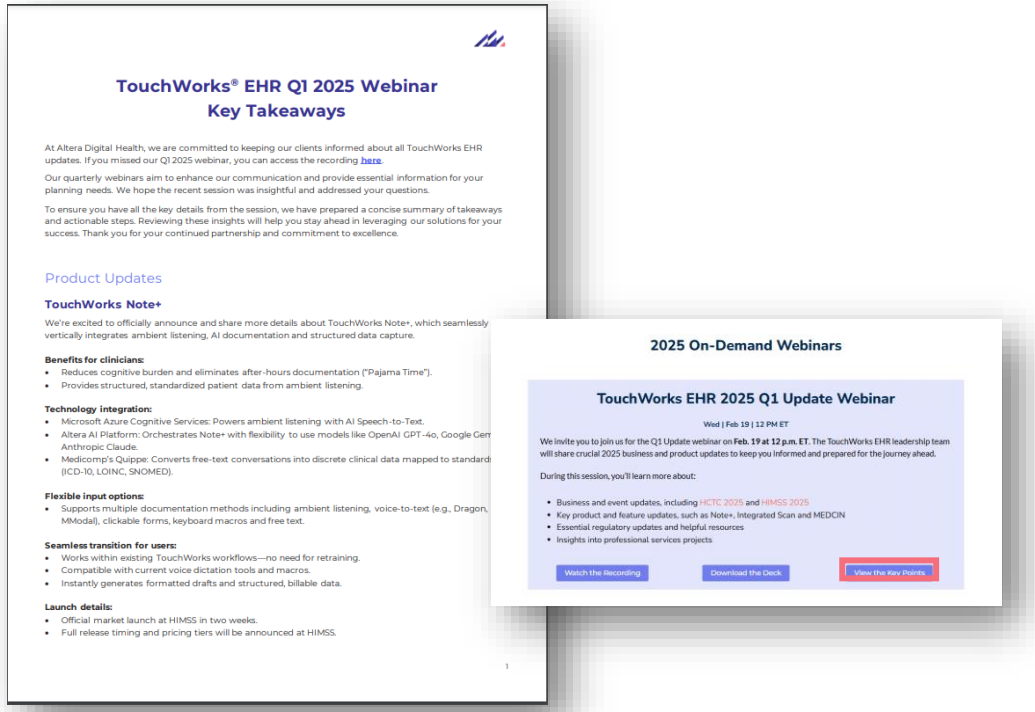
© 2025 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

Improving Client Communication

Client Survey



Webinar 'Key Points' Document



© 2025 Altera Digital Health Inc. and/or its subsidiaries. All rights reserved. Proprietary and Confidential. Do not distribute without the prior written consent of Altera.

go.alterahealth.com/2025touchworksclientseries

Reference Information, Acronym Soup

ASTP – Assistant Secretary for Technology Policy	
CHERT	Certified Health Electronic Record Technology
CHPL	Certified Health Product List
HTI	Health Data, Technology, and Interoperability
HTI-1	HTI Version 1, [Final Rule, Jan 2024]
HTI-2	HIT Version 2, [Final Rule, Dec 2024]
HTI-3	HIT Version 3, [Final Rule, Dec 2024]
eCR	Electronic Case Reporting
DSI	Decision Support Intervention
FHIR	Fast Healthcare Interoperability Resources
USCDI	United States Core Data for Interoperability

CMS - Centers for Medicare & Medicaid Services	
QPP	Quality Payment Program
MIPS	Merit-based Incentive Payment System
eCR	Electronic Case Reporting
SAFER Guides	Safety Assurance Factors for EHR Resilience Guides
eCQI	Electronic Clinical Quality Improvement
eCQMs	Electronic Clinical Quality Measures
MVPs	MIPS Value Pathways

Other Notables	
ACO	Accountable Care Organization
SDOH	Social Determinants of Health
VCRS	Veradigm Compliance Reporting Solution
AAP	Allscripts Analytical Platform

Reference Links

Acronym	Description	Website
ONC	Office of the National Coordinator	https://www.healthit.gov/
CHPL	Certified Health Product List	https://chpl.healthit.gov/#/search
HTI-1	HTI Version 1, [Final Rule, Jan 2024]	https://www.healthit.gov/topic/laws-regulation-and-policy/health-data-technology-and-interoperability-certification-program
HIT-2	HIT Version 2, [Final Rule, Dec 2024]	https://www.healthit.gov/topic/laws-regulation-and-policy/health-data-technology-and-interoperability-trusted-exchange
HTI-3	HIT Version 3, [Final Rule, Dec 2024]	https://www.healthit.gov/topic/laws-regulation-and-policy/health-data-technology-and-interoperability-protecting-care-access
FHIR	Fast Healthcare Interoperability Resources	https://www.hl7.org/fhir/
USCDI	United States Core Data for Interoperability	https://www.healthit.gov/isp/united-states-core-data-interoperability-uscdi

Reference Links

Acronym	Description	Website
QPP	Quality Payment Program	https://qpp.cms.gov/
MIPS	Merit-based Incentive Payment System	https://qpp.cms.gov/mips/mvps/learn-about-mips
eCR	Electronic Case Reporting	https://www.cdc.gov/ecr/php/index.html
SAFER Guides	Safety Assurance Factors for EHR Resilience Guides	https://www.healthit.gov/topic/safety/safer-guides
eCQMs	Electronic Clinical Quality Measures	https://www.cms.gov/medicare/regulations-guidance/promoting-interoperability-programs/electronic-clinical-quality-measures-basics
MVPs	MIPS Value Pathways	https://qpp.cms.gov/mips/mvps/learn-about-mvp-reporting-option

Bringing next-level healthcare within reach
alterahealth.com