



TouchWorks® EHR Regulatory Rally Series

March 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 March 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.

2025 Regulatory Reporting Updates

- **2025 MIPS/MVP Final Rule changes were minimal**
 - No change to the neutral adjustment threshold, which remains at 75 points
 - No change to Eligible Clinician types, minimum performance periods or performance category weights
 - CMS adopted minimum data submission criteria for each performance category
 - Improvement Activities scoring weights of medium and high removed. Instead, requires a specific number of activities to be submitted:
 - Individuals and Groups submit 2 activities.
 - Special statuses (small practice, rural, hospital-based, etc.) submit 1 activity.
 - MVP participant selects 1 activity from the relevant MVP.
 - Submission of the above number of listed activities still equals 40 points or 100% category rate.
 - Quality Category saw the complete removal of CMS 249 (from both traditional MIPS and MVP) – Appropriate Use of DXA Scans in Woman Under 65 Years Who Do Not Meet the Risk Factor Profile for Osteoporotic Fracture. In addition,
 - Maintains data completeness criteria at 75% for 2025 and 2026 and extends it through 2027 and 2028 performance year.
 - Adds new APP Plus measure set for ACO and APM reporters; required for Shared Savings participants.
 - Promoting Interoperability category had no changes.



- MIPS Value Pathways (MVP) added 5 new MVPs relevant to ambulatory clinicians, which are being assessed for addition to the VCRS MVP Dashboards:
 - Complete Ophthalmologic Care
 - Gastroenterology Care
 - Optimal Care for Patients with Urologic Conditions
 - Dermatology Care
 - Pulmonology Care
- MVP registration process no longer requires participant to select one population health measure as CMS will now automatically score the two measures and add it to your Quality category score.
- 2 neurology-focused MVPs combined into a single neurologic MVP: Quality Care for Patients with Neurological Conditions.

Electronic Case Reporting (eCR) Update

- TouchWorks EHR is currently in Phase 4 (client Beta testing) of the CDC Certification testing with the CDC. Slow testing response from the CDC has been escalated to CMS, CDC and the ONC.
- We will keep clients updated as TouchWorks moves through Phase 4 client Beta testing and projections for when the CDC will move us to Phase 5 – Production and onboarding. Stay tuned for more on this topic as we move into 2025!

VCRS 2025 Regulatory Dashboard Updates

- **VCRS version 25.2 release coming in early April**, which will contain traditional MIPS focused updates, including:
 - All 2025 dashboard date ranges.
 - 2025 eQCM logic updates along with reprocessing of data back to Jan 1, 2025, so measure data is updated.
 - Incorporation of the 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
 - Addition of CMS 125 – Breast Cancer Screening measure to the APM/ACO/APP Quality Dashboards to support the new APP Plus measure set.
- **Coming Soon! VCRS version 25.3**, expected early Q3, which updates will be MVP focused:
 - Updates for 2025 changes for the existing six delivered MVPs:
 1. Value in Primary Care



2. Focusing on Women's Health
 3. Advancing Care for Heart Disease
 4. Optimal Care for Kidney Health
 5. Prevention and Treatment of Infectious Disorders
 6. Quality Care in Mental Health
- Clients with 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 TouchWorks Consulting Subscription service package. Contact your Client Delivery Executive for additional information.
 - **Reminder! To report an MVP, you must register with the Quality Payment Program during the CMS registration period, from April 1 to Dec 1, 2025.**
 - To register, you'll sign in to the [QPP website](#) with your HCQIS Access and Roles Profile (HARP) account.

2025 CEHRT Changes, FHIR Publication, HTI Highlights

- TouchWorks v2024.3 is certified to the new Decision Support Intervention certified criteria, replacing the Clinical Decision Support criteria. Most clients have confirmed their TouchWorks version 2024.3 upgrade (with FHIR R4 24.5) to be ready for 2025 reporting requirements. Thank you!
 - **Performing for Promoting Interoperability in 2025?**
 - TouchWorks upgrade to version 2024.3 or higher (with FHIR R4 version 24.5 or higher) must be in production by the first day of your 180-day performance period or no later than 07/04/2025.
 - **Reporting eCQMs but not Promoting Interoperability in 2025?**
 - TouchWorks upgrade to version 2024.3 or higher (with FHIR R4 version 24.5 or higher) must be in production by the last day of the performance period or no later than 12/31/2025.
 - **ACO or Medicare Shared Savings Programs Participants**
 - Verify your CEHRT requirement deadlines with ACO Administrators.
- Updated regulations for FHIR Publication criteria began Jan 1, 2025.
 - Must publish patient-facing FHIR endpoints in a standardized format
 - All TouchWorks clients were contacted and updated their information by the Jan 1, 2025, deadline – thank you!
 - ASTP (ONC) expectations are that FHIR R4 endpoints are always accessible!
 - Now we need to keep all information updated and continually monitor FHIR R4 "Patient" endpoints to verify they remain accessible!



- TouchWorks Regulatory Team has implemented a monthly monitoring process of all TouchWorks client endpoints – proactive Support cases are being created when a client is observed down or inaccessible to ensure these are fixed as quickly as possible.
- Client Teams should also create a monitoring process to fix issues with endpoints quickly or submit a Support case if assistance is needed. **We are in this together!**
- TouchWorks is working through HTI-1 requirements. Next up for 2025 is USCDI v3, updated standards conformance, Social Determinants of Health (SDOH), more eCR and getting ready for Insight Measure data collection, which starts Jan 1, 2026.
- Both HTI-2 and HTI-3 Final Rules landed in December of 2025. Both rules and greatly reduced requirements. HTI-2 final rule focused on TEFCA while HTI-3 final rule created a new Information Blocking “Protecting Care Access” exception.
- We provided you with a survey after the webinar to help us get your feedback and improve our communication. 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](#)

Contact

- Please make note of the important dates and actions to ensure you do not miss any crucial updates. If you have questions or need more clarification, please contact your Client Success Team.



TouchWorks® EHR Regulatory Rally Series FAQ March 2025

Below are the takeaway questions from our Regulatory Rally webinar. We share so that everyone has the information.

- **Q: “How can Alera support MVPs when the majority of available measures are CQM measures? There are very few eCQM measures in MVPs.”**

- A: We currently fully support the following MVPs for 2025:
 - 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

Each of these MVPs is **fully** supported with the eCQMs available. We understand that clients wish to be able to also report MIPS CQMs and that is something we are exploring for future offerings.

- **Q: “What is meant by new “Quality Measures badging for capped measures?”**

- A: A topped-out measure is defined by CMS related to historical benchmark scoring and are measures with historically high measure performance with limited opportunity for performance improvement. Typically, these measures are capped at 7 points when topped out for 2 consecutive years for a specific collection type. Clinicians who aren’t facing limited measure choice are encouraged to report on other quality measures to earn more than 7 points available for capped measures. However, some clinicians have a limited ability to select alternate measures. CMS has defined a new policy that removes the 7-point cap for specific topped out measures, as defined through rulemaking (not all topped out measures have the 7-point cap removed). This allows specialties impacted by limited measure choice to be scored according to defined topped out measure benchmarks.

The new VCRS dashboard badging will help clients visually distinguish a measure if the topped-out cap has been removed.

Measures Scored According to the new Topped Out Measure Benchmarks for 2025:



Measures Scored According to Topped Out Measure Benchmarks

Quality ID	Measure Title	Collection Type
143	Oncology: Medical and Radiation - Pain Intensity Quantified	eCQM, MIPS CQM
249	Barret's Esophagus	Medicare Part B Claims Measure, MIPS CQM
250	Radical Prostatectomy Pathology Reporting	Medicare Part B Claims Measure, MIPS CQM
360	Optimizing Patient Exposure to Ionizing Radiation: Count of Potential High Dose Radiation Imaging Studies: Computed Tomography (CT) and Cardiac Nuclear Medical Studies	MIPS CQM
364	Optimized Patient Exposure to Ionizing Radiation: Appropriateness: Follow-up CT imaging for Incidentally Detected Pulmonary Nodules According to Recommended Guidelines	MIPS CQM
395	Lung Cancer Reporting (Biopsy/Cytology Specimens)	Medicare Part B Claims Measure, MIPS CQM
396	Lung Cancer Reporting (Resection Specimens)	MIPS CQM
397	Melanoma Reporting	Medicare Part B Claims Measure, MIPS CQM

- **Q: “You mentioned we had to be on 2025.3 but we thought 2025.2 is ok since it’s a certified version”**
- A: Though TouchWorks is certified across multiple versions, CMS defines specific criteria that must be met to perform for MIPS Promoting Interoperability, eQMs, MSSP’s or other ACO’s. Each year TouchWorks will define the “minimum” certified version a client must have in Production to perform. Typically, this will have an “or higher” qualifier so that if your TouchWorks version is higher than the stated minimum, this is always okay as well. For the 2025 Performance Year, the minimum version of TouchWorks is v2024.3 or higher (with FHIR version 25.4 or higher). TouchWorks 2025.3 is not generally available yet, and this version is anticipated to be the minimum version needed for the 2026 Performance Period (NOT 2025). Typically, the TouchWorks version number is one year behind the year it will be required.
- **Q: “What is the last day that we must be live with eCR to be compliant since you are still in phase 4...”**
- A: We are currently in Beta Testing with the CDC. As we said in the Rally the delay is with the CDC and we have escalated this to the CDC, ASTP and with CMS. Stay tuned for further updates.
- **Q: “What is Altera doing to help customers get their FHIR endpoints up & available?”**
- A: We have created a proactive monitoring process. FHIR R4 “patient” endpoints are being monitored weekly and monthly by our Regulatory Team. If we observe that an endpoint is down for longer than a month, a proactive Support case is being opened on your behalf asking your team to work with a Support technician to resolve any issues and verify the FHIR R4 “patient” endpoint is accessible. As



discussed in the Webinar, we have also asked our clients to create their own monitoring process and if your team sees your endpoint down and does not understand how to resolve the issue, to also create a Support case for assistance.

- If you have a Support case related to FHIR R4 and endpoint accessibility that needs escalation, please email Julie Wilson at Julie.wilson@alterahealth.com

- **Q: “If we fall under A-APMs, what is the reporting period for 2026?”**

- A: Please reach out to your APM for further information as 2026 reporting requirements have not been released at this time.

- **Q: “Can someone confirm TWEHR v25.1 meets the PY2025 CEHRT requirement?”**

- A: The minimum required TouchWorks version for PY2025 is v2024.3 or higher, which means that v2025.1 is also acceptable.

VCRS Regulatory Dashboards does not hold its own, separate certification from TouchWorks. Version review for VCRS is to provide functionality release updates for our clients only. A specific VCRS version is not required to meet CEHRT requirements.

- **Q: “With our upgrade to 2025.1 we are required to add Regulatory code categories to the OID. What is this for?”**

- A: The Regulatory Category was added so that WE (the Health IT Vendor) can distinguish between the different order types that are being requested for data exchange, and it is NOT a requirement of the clients.

- **Q: “When will this recording be available?”**

- A: The recording is available on the [2025 TouchWorks Webinar Series Website](#) along with the PowerPoint deck and key points document.

- **Q: When is the next Regulatory Rally?**

- A: Mark your calendar for the next Rally, which is coming Thursday, June 12, 2025!

Contact your Altera Client Success Executive for additional questions!