

MVP Development Standardized Template CY 2025 Final versus CY 2026 Final

Burden impact: The changes to the MVP Development Standardized Template reflect finalization of proposals, language updates, and additional text added from the CY 2025 Physician Fee Schedule (PFS) Final Rule for the Quality Payment Program to the CY 2026 Physician Fee Schedule (PFS) Final Rule for the Quality Payment Program. The result is an estimated change of zero hours.

Change #1:

Location: Page 1

Reason for Change:

Language updates

CY 2025 Final Rule text:

Purpose

The Centers for Medicare & Medicaid Services (CMS) invites the interested parties to submit Merit-based Incentive Payment System (MIPS) Value Pathways (MVP) candidates for CMS' consideration and potential implementation through future rulemaking.

This solicitation is separate from the annual Call for Quality Measures, Call for Improvement Activities, and Solicitation for Specialty Set Recommendations.

CY 2026 Final Rule text:

Purpose

The Centers for Medicare & Medicaid Services (CMS) invites interested parties to submit Merit-based Incentive Payment System (MIPS) Value Pathways (MVP) candidates for CMS' consideration and potential implementation through future rulemaking.

This solicitation is separate from the annual Call for Quality Measures, Call for Improvement Activities, and Solicitation for Specialty Set Recommendations.

Change #2:

Location: Page 1-2

Reason for Change:

Language updates, hyperlink updates

CY 2025 Final Rule text:

About MVPs

Through MVP implementation and reporting, CMS aims to improve patient outcomes, allow for more meaningful reporting by specialists and other MIPS eligible clinicians, and reduce burden and complexity associated with selecting from a large inventory of measures and activities found under traditional MIPS.

MVPs provide a pathway for clinicians to report on an applicable clinical topic based on their specialty, their medical condition focus, or the setting in which they provide patient care. CMS has identified priority specialties and clinical topics for MVP development. Interested parties are encouraged to submit MVPs that address these priority areas. The 2025 MVP "Needs and Priorities" document provides additional information and will be available in the QPP website, [MVP Candidate Development & Submission webpage](#), [MVPs Development Resources ZIP file](#).

The MVP framework strives to link measures and improvement activities that address a common clinical theme across the 4 MIPS performance categories. More details regarding the intent of the MVP framework can be found on the [MVP Candidate Development & Submission webpage](#).

While stakeholder feedback in MVP development is appreciated, ultimately CMS will determine if a given MVP candidate will move forward through rulemaking. CMS owns all MVPs that are established through notice and comment rulemaking. CMS will determine if the MVP is appropriate and responsive to the needs and priorities of the Agency, Department, and Administration. In addition to determining if an MVP candidate aligns with programmatic needs, CMS will also determine when an MVP candidate is ready for proposal through rulemaking for future implementation.

In the Calendar Year (CY) 2023 Physician Fee Schedule (PFS) Final Rule, we finalized the modification of the MVP development process to include a 30-day feedback period for interested parties to submit feedback on candidate MVPs prior to potentially including an MVP in a notice of proposed rulemaking. At the discretion of CMS and when possible, we will extend the 30-day feedback period up to 45-days in order to give interested parties additional time to provide feedback.

All MVPs, whether they are new or existing MVPs with updates, must undergo notice and comment rulemaking and are subject to the public comment period. If CMS determines that additional changes are needed for an MVP once it's implemented, CMS may take additional steps through notice and comment rulemaking to make updates.

CY 2026 Final Rule text:

About MVPs

Through MVP implementation and reporting, CMS aims to improve patient outcomes, allow for more meaningful reporting by specialists and other MIPS eligible clinicians, and reduce burden and complexity associated with selecting from a large inventory of measures and activities found under traditional MIPS.

MVPs provide a pathway for clinicians to report on an applicable clinical topic based on their specialty, their focus on a medical condition, or the setting in which they provide patient care. CMS has identified priority specialties and clinical topics for MVP development. Interested parties are encouraged to submit MVPs that address these priority areas. The 2026 MVP Needs and Priorities document provides additional information and is available in the QPP webpage, link provided here [MVP Candidate Development & Submission](#).

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In the Calendar Year (CY) 2023 Physician Fee Schedule (PFS) Final Rule, we finalized the modification of the MVP development process to include a 30 day feedback period for interested parties to submit feedback on candidate MVPs before they are potentially included in

a notice of proposed rulemaking. At the discretion of CMS and when possible, we will extend the 30 day feedback period up to 45 days to give interested parties additional time to provide feedback.

All MVPs, whether they are new or existing MVPs with updates, must undergo notice and comment rulemaking and are subject to the public comment period. If CMS determines that additional changes are needed for an MVP once it's implemented, CMS may take additional steps through notice and comment rulemaking to make updates.

Change #3:

Location: Page 2

Reason for Change:

Language updates, hyperlink updates

CY 2025 Final Rule text:

Introduction

Use the standardized template below to submit an MVP candidate for consideration. MVP candidate submissions should include measures and activities across the quality, cost, and improvement activities performance categories. In addition to these core performance categories, each MVP candidate includes what is referred to as the foundational layer, which includes the Promoting Interoperability measure/objective set and two population health measures:

- Q479: Hospital-Wide, 30-Day, All-Cause Unplanned Readmission (HWR) Rate for the Merit-based Incentive Payment Program (MIPS) Groups; and,
- Q484: Clinician and Clinician Group Risk-standardized Hospital Admission Rates for Patients with Multiple Chronic Conditions.

The foundational layer measures are prefilled in the template (Tables 2B and 2C) because they are required across all MVP candidates and can't be changed. The Promoting Interoperability performance category measure specifications are available on the [Promoting Interoperability Performance Category webpage](#).

Complete and submit Table 1 and Table 2A of the template below for each intended MVP candidate. **Both tables must be completed for CMS to consider your submission.**

- Table 1 should include high-level descriptive information as outlined below.
- Table 2A should include the specific quality measures, improvement activities, and cost measures for the MVP candidate submission.
 - CMS isn't prescriptive regarding the number of measures and activities that may be included in an MVP as long as there are a sufficient number of measures and activities to meet the reporting requirements; therefore, when completing Table 2A, the number of rows included should reflect the number of measures/activities that are necessary to describe the MVP candidate submission.
 - IA_PCMH is included in all MVPs because MIPS eligible clinicians in a patient-centered medical home or comparable specialty practice may attest to it and receive an improvement activity score of 100 percent per statute (Code of Federal Regulations § 414.1380(b)(3)(ii)).
 - IA_MVP: Practice-Wide Quality Improvement in MIPS Value Pathways is included in all MVPs as it was developed specifically for MVP reporting.

Additional guidance and considerations for completing Table 2A can be found in the [Appendix](#).

CY 2026 Final Rule text:

Introduction

Use the standardized template below to submit an MVP candidate for consideration. MVP candidate submissions should include measures and activities across the quality, cost, and improvement activities performance categories. In addition to these core performance categories, each MVP candidate includes what is referred to as the foundational layer, which includes the Promoting Interoperability performance category measures and two population health measures:

- Q479: Hospital-Wide, 30-Day, All-Cause Unplanned Readmission (HWR) Rate for the Merit-based Incentive Payment System (MIPS) Groups; and,
- Q484: Clinician and Clinician Group Risk-standardized Hospital Admission Rates for Patients with Multiple Chronic Conditions.

The foundational layer measures are prefilled in the template (Tables 2B and 2C) because they are required across all MVP candidates and can't be changed. The Promoting Interoperability performance category measure specifications are available on the [QPP webpage](#).

Complete and submit Table 1 and Table 2A of the template below for each intended MVP candidate. **Both tables must be completed for CMS to consider your submission.**

- Table 1 should include high-level descriptive information as outlined below.
- Table 2A should include the specific quality measures, improvement activities, and cost measures for the MVP candidate submission.
 - CMS isn't prescriptive regarding the number of measures and activities included in an MVP as long as there are a sufficient number of measures and activities to meet the reporting requirements; therefore, when completing Table 2A, the number of rows included should reflect the number of measures/activities that are necessary to describe the MVP candidate submission.
 - In accordance with § 414.1380(b)(3)(ii), MIPS eligible clinicians in a practice that are certified or recognized as a patient-centered medical home or comparable specialty practice, as determined by the Secretary, may attest to IA_PCMH and receive an improvement activities performance category score of 100 percent (81 FR 77179 through 77180).
 - IA_MVP: Practice-Wide Quality Improvement in MIPS Value Pathways is included in all MVPs as it was developed specifically for MVP reporting.

Additional guidance and considerations for completing Table 2A are in the [Appendix](#).

Change #4:

Location: Page 2

Reason for Change:

Language updates

CY 2025 Final Rule text:

MVP Candidate Content and Review Process

CMS encourages MVP submissions to include quality/cost measures and improvement activities that are currently available in MIPS. To view all MIPS measures and improvement activities, please visit the [Quality Payment Program \(QPP\) Resource Library](#) or review the most recent [Measures Under Consideration \(MUC\)](#) list. Measures and/or improvement activities not

currently in the MIPS inventory will be required to follow the existing pre-rulemaking processes to be considered for inclusion within an MVP.

CY 2026 Final Rule text:
MVP Candidate Content and Review Process

CMS encourages MVP submissions include quality and cost measures, as well as improvement activities that are currently available in MIPS. To view all MIPS measures and improvement activities, please visit the [Quality Payment Program \(QPP\) Resource Library](#) or review the most recent [Measures Under Consideration \(MUC\)](#) list. Measures and/or improvement activities not currently in the MIPS inventory will be required to follow the existing pre-rulemaking processes to be considered for inclusion within an MVP.

Change #5:
Location: Page 2-3
Reason for Change:
Language updates
CY 2025 Final Rule text:
Quality Measures

The current inventory of MIPS quality measures and Quality Clinical Data Registry (QCDR) measures include both cross-cutting and specialty/clinical topic specific quality measures. The following 2025 resources will be available on the [QPP Resource Library](#):

- 2025 MIPS Quality Measures List (XLSX)
- 2025 Cross-Cutting Quality Measures (PDF)
- 2025 QCDR Measure Specifications (XLSX)

QDCR measures may also be considered for inclusion in an MVP if the measure has met all requirements, including **being fully tested at the clinician level, and approved through the self-nomination process.**

In addition, as described in the CY 2022 PFS final rule, when developing MVP candidates, the interested parties should consider that:

- MVPs must include at least one outcome measure that is relevant to the MVP topic and each clinician specialty:
 - An outcome measure may include the following measure types: outcome, intermediate outcome, and patient-reported outcome-based performance measure.
 - *An example of a single specialty MVP is the Patient Safety and Support of Positive Experiences with Anesthesia MVP. This MVP was developed to include an outcome measure related to care provided by this specialty.*
 - If an outcome measure isn't available for a given clinician specialty, a high priority measure must be included and available for each clinician specialty included.
 - *An example of an MVP that contains high priority measures is the Advancing Cancer Care MVP. This MVP contains one outcome measure, but also includes quality measures that are categorized as high priority in the instance the outcome measure is not applicable.*

- *Outcome-based administrative claims measures may be included to support the quality performance category of an MVP candidate.*
 - *An example of an MVP containing an outcome-based administrative claims measure for use in the quality performance category is the Improving Care for Lower Extremity Joint Repair MVP.*

CY 2026 Final Rule text:
Quality Measures

The current inventory of MIPS quality measures and Quality Clinical Data Registry (QCDR) measures include both specialty specific and cross-cutting quality measures. The following 2026 resources will be available on the [QPP Resource Library](#):

- 2026 MIPS Quality Measures List (XLSX)
- 2026 Cross-Cutting Quality Measures (PDF)
- 2026 QCDR Measure Specifications (XLSX)

QDCR measures may also be considered for inclusion in an MVP if the measure has met all requirements, including **being fully tested at the clinician level, and approved through the self-nomination process.**

In addition, as described in the CY 2022 PFS final rule, when developing MVP candidates, the interested parties should consider that:

- MVPs must include at least one outcome measure that is relevant to the MVP topic and each clinician specialty:
 - An outcome measure may include the following measure types: outcome, intermediate outcome, and patient-reported outcome-based performance measure.
 - *For example, the Patient Safety and Support of Positive Experiences with Anesthesia MVP is a single specialty MVP developed to include an outcome measure related to care provided by this specialty.*
 - If an outcome measure isn't available for a given clinician specialty, a high priority measure must be included and available for each clinician specialty included.
 - *For example, the Advancing Cancer Care MVP contains one outcome measure, but also includes quality measures that are categorized as high priority in the instance the outcome measure isn't applicable.*
 - *Outcome-based administrative claims measures may be included to support the quality performance category of an MVP candidate.*
 - *For example, the Improving Care for Lower Extremity Joint Repair MVP contains an outcome-based administrative claims measure for use in the quality performance category.*

Change #6:

Location: Page 3

Reason for Change:

Language updates, hyperlink addition

CY 2025 Final Rule text:

Improvement Activities

Improvement activities are broader in application and cover a wide range of clinician types and health conditions. Improvement activities that best drive the quality of care addressed in the MVP topic should be prioritized. Improvement activities should complement and/or supplement the quality action of the measures in the MVP candidate submission, rather than duplicate it.

The 2025 Improvement Activity Inventory will be available on the QPP Resource Library.

New improvement activities may be submitted using the 2025 Call for Measures and Activities process, which will be outlined on the [QPP Resource Library](#).

CY 2026 Final Rule text:
Improvement Activities

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The 2026 Improvement Activity Inventory is available at [Explore Measures and Activities](#).

New improvement activities may be submitted using the 2026 Call for Measures and Activities process, which will be outlined at [QPP Resource Library](#).

Change #7:

Location: Page 3-4

Reason for Change:

Language updates

CY 2025 Final Rule text:

Cost Measures

The current inventory of cost measures covers different types of care. Episode-based cost measures assess specific clinically related costs during a defined period, or “episode of care.” These measures can apply to clinicians and clinicians groups who perform procedures (e.g., knee arthroplasty), treat patients during acute inpatient hospitalizations (e.g. stays for lower gastrointestinal hemorrhage), provide ongoing chronic condition management (e.g., ongoing diabetes care), or practice in certain settings (e.g., an emergency department).

There are also two broader measures (population-based cost measures) that assess overall costs of care. The Medicare Spending Per Beneficiary (MSPB) Clinician measure assesses costs of care for a patient’s inpatient hospital stay during the period 3 days prior to a hospital stay through 30 days after discharge. The Total Per Capita Cost (TPCC) measure assesses the overall cost of care delivered to a patient with a focus on the primary care they receive from their providers.

The following cost measure information will be available on the [QPP website](#):

- MIPS 2025 Summary of Cost Measures (PDF): Provides an overview of the cost measures, their development, and estimated cost and clinician coverage metrics for the measures currently in use.

- Measure Information Form (ZIP): Describes the methodology used to construct each measure.
- Measure Codes List (ZIP): Contains service codes and clinical logic used in the methodology, including episode triggers, exclusion categories, episode subgroups, assigned items and services, and risk adjusters.

New cost measures may be submitted for consideration for use in the MIPS program using the 2025 Call for Measures and Activities process, which will be outlined on the [QPP Resource Library](#).

CY 2026 Final Rule text:
Cost Measures

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New cost measures may be submitted for consideration for use in the MIPS program using the 2026 Call for Measures and Activities process, which will be outlined on the [QPP Resource Library](#).

Change #8:

Location: Page 4

Reason for Change:

Language updates

CY 2025 Final Rule text:

Submission and Review Process

MVP candidates can be submitted through the Call for MVPs process on a rolling basis throughout the year and will be considered for potential inclusion in the upcoming notice of proposed rulemaking. If finalized, implementation would begin with the CY 2026 performance period/2028 MIPS payment year.

MVP candidates will be reviewed by CMS as they're received. CMS will use the MVP development criteria (see [Appendix](#) below) to determine if the MVP candidate is feasible.

CMS will also evaluate the quality and cost measures from a technical perspective to validate applicability to the clinician being measured for performance. CMS will review all potential specialty-specific quality or cost measures available in the MIPS inventory to ensure only the most appropriate measures are included in the MVP candidate.

CMS may reach out to submitters of MVP candidates on an as-needed basis should questions arise during the review process. Submitting an MVP candidate doesn't guarantee it will be considered or accepted for the rulemaking process. CMS won't communicate the status of an MVP candidate (i.e., approved, rejected, or considered for a future year) with those who submitted the candidate prior to the publication of the proposed rule.

Completed MVP candidate templates (inclusive of Table 1 and Table 2A) should be submitted to MVPsupport@cms.hhs.gov for CMS evaluation.

CY 2026 Final Rule text:

Submission and Review Process

MVP candidates can be submitted through the Call for MVPs process on a rolling basis throughout the year and will be considered for potential inclusion in the upcoming notice of proposed rulemaking. If finalized, implementation would begin with the CY 2027 performance period/2029 MIPS payment year.

CMS will review MVP candidates as they're received. CMS will use the MVP development criteria (see [Appendix](#) below) to determine if the MVP candidate is feasible.

CMS will also evaluate the quality and cost measures from a technical perspective to validate applicability to the clinician being measured for performance. CMS will review all potential specialty-specific quality or cost measures available in the MIPS inventory to ensure only the most appropriate measures are included in the MVP candidate.

CMS may reach out to submitters of MVP candidates on an as-needed basis should questions arise during the review process. Submitting an MVP candidate doesn't guarantee it will be considered or accepted for the rulemaking process. CMS won't communicate the status of an MVP candidate (i.e., approved, rejected, or considered for a future year) with those who submitted the candidate prior to the publication of the proposed rule.

Completed MVP candidate templates (inclusive of Table 1 and Table 2A) should be submitted to MVPsupport@cms.hhs.gov for CMS evaluation.

Change #9:

Location: Pages 7

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2A: Instructions and Template

Please use the [Table 2A](#) template format below to identify the quality measures, improvement activities, and cost measures for your MVP candidate. At a minimum, [Table 2A](#) should include measure/activity IDs, measure/activity titles, measure collection types, and rationale for inclusion. The number of rows included should reflect the number of measures/activities that are necessary to describe the MVP candidate submission.

Generally, an MVP should include enough quality measures and improvement activities to allow MVP participants to select measures and activities to meet MIPS requirements. The total number of quality measures and activities represented within the MVP candidate may depend on their availability within MIPS.

- For example, the 2024 *Advancing Care for Heart Disease MVP* includes 18 quality measures and 14 improvement activities. Cardiac disease can encompass several conditions relative to heart care; therefore, CMS has selected measures and improvement activities that are closely aligned to the topic and offer clinicians some choice.

Additionally, each MVP must include at least 1 cost measure relevant and applicable to the MVP topic. The number of cost measures in an MVP may vary depending on the clinical topic of the MVP.

The foundational layer of measures is included below ([Table 2B](#) and [Table 2C](#)) and is pre-filled for each MVP candidate submission and can't be changed.

Please refer to the [Appendix](#) below for further guidance regarding measure and activity selection.

CY 2026 Final Rule text:

Table 2A: Instructions and Template

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Generally, an MVP should include enough quality measures and improvement activities to allow MVP participants to select measures and activities to meet MIPS requirements. The total number of quality measures and activities represented within the MVP candidate may depend on their availability within MIPS.

- For example, the 2025 *Advancing Care for Heart Disease MVP* includes 17 quality measures and 18 improvement activities. Cardiac disease can encompass several conditions related to heart care; therefore, CMS has selected measures and improvement activities that are closely aligned to the topic and offer clinicians some choice.

Additionally, each MVP must include at least 1 cost measure relevant and applicable to the MVP topic. The number of cost measures in an MVP may vary depending on the clinical topic of the MVP.

The foundational layer of measures is included below ([Table 2B](#) and [Table 2C](#)) and is pre-filled for each MVP candidate submission and can't be changed.

Please refer to the [Appendix](#) below for further guidance regarding measure and activity selection.

Change #10:

Location: Page 8

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2B: Foundational Layer – Population Health Measures

QUALITY #	MEASURE TITLE AND DESCRIPTION	COLLECTION TYPE	MEASURE TYPE / HIGH PRIORITY	NQS DOMAIN	HEALTH CARE PRIORITY	MEASURE STEWARD
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CY 2026 Final Rule text:

Table 2B: Foundational Layer – Population Health Measures

QUALITY #	MEASURE TITLE	COLLECTION TYPE	MEASURE TYPE / HIGH PRIORITY	NQS DOMAIN	HEALTH CARE PRIORITY	MEASURE STEWARD
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Change #11:

Location: Page 8

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2B: Foundational Layer – Population Health Measures

479	Hospital-Wide, 30-Day, All-Cause Unplanned Readmission (HWR) Rate for the Merit-Based Incentive Payment Program (MIPS) Eligible Clinician Groups	Administrative Claims	Outcome	Communication and Care Coordination	Promote Effective Communication & Coordination of Care	CMS
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CY 2026 Final Rule text:

Table 2B: Foundational Layer – Population Health Measures

479	Hospital-Wide, 30-Day, All-Cause Unplanned Readmission (HWR) Rate for the Merit-Based Incentive Payment System (MIPS) Groups	Administrative Claims	Outcome	Communication and Care Coordination	Promote Effective Communication & Coordination of Care	CMS
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Change #12:

Location: Page 8

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

OBJECTIVE	MEASURE ID, TITLE, AND DESCRIPTION	REQUIRED	EXCLUSION AVAILABLE	ADDITIONAL INFORMATION
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

OBJECTIVE	MEASURE ID AND TITLE	REQUIRED	EXCLUSION AVAILABLE	ADDITIONAL INFORMATION
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Change #13:

Location: Page 8

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Protect Patient Health Information	PI_PPHI_1: Security Risk Analysis: Conduct or review a security risk analysis in accordance with the requirements in 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI data created or maintained by certified electronic health record technology (CEHRT) in accordance with requirements in 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), implement security updates as necessary, and correct identified security deficiencies as part of the MIPS eligible clinician’s risk management process.	Yes	No	Annual requirement for Promoting Interoperability submission but not scored.
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Protect Patient Health Information	PI_PPHI_1: Security Risk Analysis	Yes	No	Annual requirement for Promoting Interoperability submission but not scored.
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Change #14:

Location: Page 8

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Protect Patient Health Information	<p>PI_PPHI_2: High Priority Practices Safety Assurance Factors for EHR Resilience Guide (SAFER Guide): Conduct an annual self assessment using the High Priority Practices Guide at any point during the calendar year in which the performance period occurs.</p>	Yes	No	Annual requirement for Promoting Interoperability submission but not scored.
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Protect Patient Health Information	<p>PI_PPHI_2: High Priority Practices Safety Assurance Factors for EHR Resilience Guide (SAFER Guide)</p>	Yes	No	Annual requirement for Promoting Interoperability submission but not scored.
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Change #15:

Location: Page 8

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Attestation	<p>PI_ONCDIR_1: ONC Direct Review Attestation: I attest that I - (1) Acknowledge the requirement to cooperate in good faith with ONC direct review of his or her health information technology certified under the ONC Health IT Certification Program if a request to assist in ONC direct review is received; and (2) If requested, cooperated in good faith with ONC direct review of his or her health information technology certified under the ONC Health IT Certification Program as authorized by 45 CFR part 170, subpart E, to the extent that such technology meets (or can be used to meet) the definition of CEHRT, including by permitting timely access to such technology and demonstrating its capabilities as implemented and used by the MIPS eligible clinician in the field.</p>	Yes	No	Annual requirement for Promoting Interoperability submission but not scored.
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Attestation	PI_ONCDIR_1: ONC Direct Review Attestation	Yes	No	Annual requirement for Promoting Interoperability submission but not scored.
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Change #16:

Location: Page 8

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Attestation	PI_INFBLO_2: Actions to Limit or Restrict Compatibility or Interoperability of CEHRT: I attest to CMS that I did not knowingly and willfully take action (such as to disable functionality) to limit or restrict the compatibility or interoperability of certified EHR technology.	Yes	No	Annual requirement for Promoting Interoperability submission but not scored.
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Attestation	PI_INFBLO_2: Actions to Limit or Restrict Compatibility or Interoperability of CEHRT	Yes	No	Annual requirement for Promoting Interoperability submission but not scored.
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Change #17:

Location: Page 9

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

e-Prescribing	PI_EP_1: e-Prescribing: At least one permissible prescription written by the MIPS eligible clinician is transmitted electronically using CEHRT.	Yes	Yes	
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Electronic Prescribing	PI_EP_1: e-Prescribing	Yes	Yes	
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Change #18:

Location: Page 9

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

e-Prescribing	<p>PI_EP_2: Query of Prescription Drug Monitoring Program (PDMP): For at least one Schedule II opioid or Schedule III or IV drug electronically prescribed using CEHRT during the performance period, the MIPS eligible clinician uses data from CEHRT to conduct a query of a PDMP for prescription drug history.</p>	Yes	Yes	
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Electronic Prescribing	PI_EP_2: Query of Prescription Drug Monitoring Program (PDMP)	Yes	Yes	
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Change #19:

Location: Page 9

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Provider to Patient Exchange	<p>PI_PEA_1: Provide Patients Electronic Access to Their Health Information: For at least one unique patient seen by the MIPS eligible clinician: (1) The patient (or the patient-authorized representative) is provided timely access to view online, download, and transmit his or her health information; and (2) The MIPS eligible clinician ensures the patient's health information is available for the patient (or patient-authorized representative) to access using any application of their choice that is configured to meet the technical specifications of the Application Programming Interface (API) in the MIPS eligible clinician's certified electronic health record technology (CEHRT).</p>	Yes	No	
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Provider to Patient Exchange	<p>PI_PEA_1: Provide Patients Electronic Access to Their Health Information</p>	Yes	No	
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Change #20:

Location: Page 9

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Health Information Exchange	<p>PI_HIE_1: Support Electronic Referral Loops by Sending Health Information: For at least one transition of care or referral, the MIPS eligible clinician that transitions or refers their patient to another setting of care or health care provider — (1) creates a summary of care record using certified electronic health record technology (CEHRT); and (2) electronically exchanges the summary of care record.</p>	Yes	Yes	<p>The optional PI_HIE_5 or PI_HIE_6 Health Information Exchange measure may be reported as an alternative reporting option to PI_HIE_1 and PI_HIE_4.</p>
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Health Information Exchange	PI_HIE_1: Support Electronic Referral Loops by Sending Health Information	Yes	Yes	The PI_HIE_5 or PI_HIE_6 Health Information Exchange measure may be reported as an alternative reporting option to PI_HIE_1 and PI_HIE_4.
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Change #21:

Location: Page 9

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Health Information Exchange	PI_HIE_4: Support Electronic Referral Loops by Receiving and Reconciling Health Information: For at least one electronic summary of care record received for patient encounters during the performance period for which a MIPS eligible clinician was the receiving party of a transition of care or referral, or for patient encounters during the performance period in which the MIPS eligible clinician has never before encountered the patient, the MIPS eligible clinician conducts clinical information reconciliation for medication, medication allergy, and current problem list.	Yes	Yes	The optional PI_HIE_5 or PI_HIE_6 Health Information Exchange measure may be reported as an alternative reporting option to PI_HIE_1 and PI_HIE_4.
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Health Information Exchange	PI_HIE_4: Support Electronic Referral Loops by Receiving and Reconciling Health Information	Yes	Yes	The PI_HIE_5 or PI_HIE_6 Health Information Exchange measure may be reported as an alternative reporting option to PI_HIE_1 and PI_HIE_4.
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Change #22:

Location: Page 9

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Health Information Exchange	<p>PI_HIE_5: Health Information Exchange (HIE) Bi-Directional Exchange: The MIPS eligible clinician or group must attest that they engage in bi-directional exchange with an HIE to support transitions of care.</p>	Yes	No	This measure is an optional alternative Health Information Exchange measure and may be reported as an alternative reporting option in place of PI_HIE_1 and PI_HIE_4 OR PI_HIE_6.
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Health Information Exchange	<p>PI_HIE_5: Health Information Exchange (HIE) Bi-Directional Exchange</p>	Yes	No	This measure may be reported as an alternative reporting option in place of PI_HIE_1 and PI_HIE_4 OR PI_HIE_6.
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Change #23:

Location: Page 9

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Health Information Exchange	<p>PI_HIE_6: Enabling Exchange Under the Trusted Exchange Framework and Common Agreement (TEFCA): The MIPS eligible clinician or group must attest to the following:</p> <ul style="list-style-type: none"> • Participating as a signatory to a Framework Agreement (as that term is defined by the Common Agreement for Nationwide Health Information Interoperability as published in the Federal Register and on ONC’s website) in good standing (that is, not suspended) and enabling secure, bi-directional exchange of information to occur, in production, for every patient encounter, transition or referral, and record stored or maintained in the EHR during the performance period, in accordance with applicable law and policy. • Using the functions of CEHRT to support bi-directional exchange of patient information, in production, under this Framework Agreement. 	Yes	No	This measure is an optional alternative Health Information Exchange measure and may be reported as an alternative reporting option in place of PI_HIE_1 and PI_HIE_4 OR PI_HIE_5.
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Health Information Exchange	PI_HIE_6: Enabling Exchange Under the Trusted Exchange Framework and Common Agreement (TEFCA)	Yes	No	This measure may be reported as an alternative reporting option in place of PI_HIE_1 and PI_HIE_4 OR PI_HIE_5.
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Change #24:

Location: Page 9

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_1: Immunization Registry Reporting: The MIPS eligible clinician is in active engagement with a public health agency to submit immunization data and receive immunization forecasts and histories from the public health immunization registry /immunization information system (IIS).	Yes	Yes	
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_1: Immunization Registry Reporting	Yes	Yes	
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Change #25:

Location: Page 10

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_2: Syndromic Surveillance Reporting: The MIPS eligible clinician is in active engagement with a public health agency to submit syndromic surveillance data from an urgent care setting.	No	No	Bonus Promoting Interoperability measure at this time.
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_2: Syndromic Surveillance Reporting	No	No	Bonus Promoting Interoperability measure.
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Change #26:

Location: Page 10

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_3: Electronic Case Reporting: The MIPS eligible clinician is in active engagement with a public health agency to electronically submit case reporting of reportable conditions.	Yes	Yes	
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_3: Electronic Case Reporting	Yes	Yes	
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Change #27:

Location: Page 10

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_4: Public Health Registry Reporting: The MIPS eligible clinician is in active engagement with a public health agency to submit data to public health registries.	No	No	Bonus Promoting Interoperability measure at this time.
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_4: Public Health Registry Reporting	No	No	Bonus Promoting Interoperability measure.
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Change #28:

Location: Page 10

Reason for Change:

Language updates

CY 2025 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_5: Clinical Data Registry Reporting: The MIPS eligible clinician is in active engagement to submit data to a clinical data registry.	No	No	Bonus Promoting Interoperability measure at this time.
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CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_5: Clinical Data Registry Reporting	No	No	Bonus Promoting Interoperability measure.
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Change #29:

Location: Page 10

Reason for Change:

New language addition

CY 2025 Final Rule text:

N/A

CY 2026 Final Rule text:

Table 2C: Foundational Layer – Promoting Interoperability Measures

Public Health and Clinical Data Exchange	PI_PHCDRR_6: Public Health Reporting Using TEFCAs	No	No	Bonus Promoting Interoperability measure.
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Change #30:

Location: Pages 11

Reason for Change:

Language updates

CY 2025 Final Rule text:

Quality Measures:

- Do the quality measures included in the MVP meet the existing quality measure inclusion criteria? (For example, does the measure align with current clinical guidelines?)
- Have the quality measure denominators been evaluated to ensure they are relatable in clinical topic, setting, and specialty (including nurse practitioners, physician assistants, certified registered nurse anesthetists, and clinical social workers) to the cost measure(s) and activities within the MVP?

- These quality measures should include appropriate settings and applicability to non-physician practitioners (e.g., nurse practitioners, physician assistants, etc.).
- Have the quality measure numerators been assessed to ensure congruency to the MVP topic?
- Does the MVP include outcome measures or high-priority measures in instances where outcome measures are not available or applicable?
 - CMS prefers use of patient experience/survey measures when available. CMS encourages the interested parties to utilize our established pre-rulemaking processes, such as the Call for Quality Measures, described in the [CY 2020 PFS final rule](#) (84 FR 62953 through 62955) to develop outcome measures relevant to their specialty if outcome measures currently do not exist and for eventual inclusion into an MVP.
- To the extent feasible, does the MVP avoid including quality measures that are topped out?
- For which collection types are the measures available?
- What role does each quality measure play in driving quality clinical care and improving healthcare value within the MVP?
- To the extent feasible, specialty and sub-specialty specific quality measures are incorporated into the MVP. Broadly applicable and/or cross-cutting quality measures may be incorporated if relevant to the clinicians being measured.

CY 2026 Final Rule text:

Quality Measures:

- Do the quality measures included in the MVP meet the existing quality measure inclusion criteria? (For example, does the measure align with current clinical guidelines?)
- Have the quality measure denominators been evaluated to ensure they are relatable in clinical topic, setting, and specialty (including non-physician practitioners (NPPs) such as nurse practitioners, physician assistants, certified registered nurse anesthetists, and clinical social workers) to the cost measure(s) and activities within the MVP?
- Have the quality measure numerators been assessed to ensure congruency to the MVP topic?
- Does the MVP include outcome measures or high-priority measures in instances where outcome measures aren't available or applicable?
 - CMS prefers use of patient experience/survey measures when available. CMS encourages the interested parties to utilize our established pre-rulemaking processes, such as the Call for Quality Measures, described in the [CY 2020 PFS final rule](#) (84 FR 62953 through 62955) to develop outcome measures relevant to their specialty if outcome measures currently don't exist and for eventual inclusion into an MVP.
- To the extent feasible, does the MVP avoid including quality measures that are topped out?
- For which collection types are the measures available?
- What role does each quality measure play in driving quality clinical care and improving healthcare value within the MVP?
- To the extent feasible, specialty and sub-specialty specific quality measures are incorporated into the MVP. Broadly applicable and/or cross-cutting quality measures may be incorporated if relevant to the clinicians being measured.

Change #31:

Location: Pages 11

Reason for Change:

Language updates

CY 2025 Final Rule text:

Cost Measures:

- What role does the cost measure(s) play in driving quality care and improving value within the MVP? Provide a rationale as to why each cost measure was selected.
- How do the included cost measure(s) relate to quality measures and activities included in the MVP?
- Are the included cost measures relevant to the specific types of care (for example, conditions or procedures) and clinicians (for example, specialties or subspecialties) intended to be assessed by the MVP?

CY 2026 Final Rule text:

Cost Measures:

- What role does the cost measure(s) play in improving value within the MVP? Provide a rationale as to why each cost measure was selected.
- How do the included cost measure(s) relate to quality measures and activities included in the MVP?
- Are the cost measures included relevant to the specific types of care (for example, conditions or procedures) and clinicians (for example, specialties or subspecialties) intended to be assessed by the MVP?)
