



APM Performance Pathway (APP) Requirements: 2025 Quality Data Submission

MIPS APM Individuals, Groups, APM Entities (All Models and Programs,
Excluding Shared Savings Program ACOs)

What Quality Data Submission Options are Available?

MIPS APM participants generally have the option to report to MIPS using the APM Performance Pathway (APP), and Shared Savings Program ACOs must report using the APP. For the Calendar Year 2025 MIPS performance period, most APM-participating individuals, groups, and APM Entities have two options for what quality measure set to use to report the APP. However, Shared Savings Program ACOs must report the APP Plus quality measure set. Each quality measure set provides options with respect to which collection types may be used for APP quality submissions, as outlined below.

If you participate at this level...	You can use this collection type set...
Individual, Group, APM Entity (All Models/Programs, Excluding Shared Savings Program ACOs)	<u>Option 1: APP Quality Measures</u> - eCQM*, MIPS CQM, or Medicare Part B Claims** (3 measures); - CAHPS for MIPS Survey; and - Administrative Claims (2 measures). OR <u>Option 2: APP Plus Quality Measures</u> (NEW for 2025) - eCQM*, MIPS CQM, Medicare Part B Claims**, Medicare CQM*** (4 measures); - CAHPS for MIPS Survey; and - Administrative Claims (1 measure).
APM Entity (Shared Savings Program ACO Only)	<u>Option 2: APP Plus Quality Measures</u> (NEW for 2025) - eCQM*, MIPS CQM, Medicare Part B Claims**, Medicare CQM*** (4 measures); - CAHPS for MIPS Survey; and - Administrative Claims (1 measure).

	Download the PY 2025 APP Quality Requirements (Shared Savings Program ACOs Only) zip file on the QPP Resource Library to view the 2025 APP quality measure sets and measures specifications that are applicable for Shared Savings Program ACOs only.
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*Beginning in the CY 2025 performance period, **APM Entities (including Shared Savings Program ACOs) and virtual groups** are eligible to receive a **complex organization adjustment** when reporting **electronic clinical quality measures (eCQMs)**. One measure achievement point is added for each eCQM submitted when the APM Entity or virtual group that meets data completeness and case minimum requirements. The complex organization adjustment will **not exceed 10 percent** of the total available measure achievement points in the quality performance category.

Only individuals, groups, and APM Entities with the small practice designation can report **Medicare Part B claims measures.

*** With respect to the **Medicare CQM for Accountable Care Organizations Participating in the Medicare Shared Savings Program (Medicare CQM)**, a Shared Savings Program ACO is required to collect and report data on the ACO's Medicare fee-for-service beneficiaries that meet the definition of a beneficiary eligible for Medicare CQMs at 42 CFR 425.20.

Version History

Date	Change Description
04/10/2025	Original version