



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

Shared Savings Program ACOs Only

What Quality Data Submission Options are Available?

For performance year (PY) 2025, Shared Savings Program ACOs must report the APP Plus quality measure set. Shared Savings Program ACOs have options with respect to which collection types to use for APP quality submissions, in other MIPS APMs 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). Download the PY 2025 APP Quality Requirements (All Participants, Excluding SSP ACOs) zip file on the QPP Resource Library to view the 2025 APP quality measure set and measures specifications that are applicable for individuals, groups, and APM Entities, including all models and programs, except for Shared Savings Program ACOs.
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).

* Beginning in the CY 2025 performance period, **Shared Savings Program ACOs** 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 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.

Shared Savings Program ACOs 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