

News Release
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NAACOS Statement on CMS's Proposed 2022 Medicare Physician Fee Schedule *Attributed to Clif Gaus, Sc.D., President and CEO of the National Association of ACOs*

The Centers for Medicare & Medicaid Services (CMS) today took the appropriate step by proposing to roll back changes that the agency finalized last year in how accountable care organizations (ACOs) report and are measured on quality. Specifically, the agency proposes to allow Medicare Shared Savings Program (MSSP) ACOs to continue to use the Web Interface reporting option in 2022 and 2023, phasing in the new electronic clinical quality measure (eCQM) reporting requirement over three years as opposed to requiring eCQM reporting starting in 2022. NAACOS over the last year has cited potential negative consequences to patient care among the many reasons why such a rapid shift to eCQM reporting was bad policy. NAACOS is pleased that the Biden Administration listened to these concerns and is taking action. Delaying last year's changes is the right thing to do. The healthcare industry, including ACOs, electronic health record (EHR) vendors and government payers, need more time before mandating electronic quality measures, and we are pleased to see CMS provide this necessary transition time. We look forward to continuing to work with the new administration to make improvements to the way ACOs are assessed on quality in the future, among other important MSSP changes.

BACKGROUND

When the healthcare industry was in the midst of an ongoing pandemic, CMS last year finalized a move to electronic clinical quality measures (eCQMs) for ACOs, among other changes. The move required ACOs in the MSSP to aggregate data from disparate EHR systems, which are not interoperable, and report on quality data on all patients regardless of payer, raising issues with collecting data from non-ACO providers and on patients with no direct connection to the ACO. The move could also widen health disparities as ACOs' quality performance could be misrepresented as differences in quality when variation is likely due to patient access to care or complexity.

In a survey fielded this spring by the NAACOS, where a quarter of all MSSP ACOs responded, nearly 75 percent stated their ACO was either "extremely concerned" or "very concerned" with the requirement to implement electronic Clinical Quality Measures (eCQMs) or Merit-based Incentive Payment System (MIPS) CQMs in 2022. Also from the survey, 85 percent said aggregating data from ACO participants' EHRs would be either "difficult" or "very difficult" to report. In May, 11 leading healthcare organizations [called on the Biden administration](#) to delay and make significant changes to quality reporting for ACOs — citing rushed implementation, still unanswered questions on changes, and potential negative consequences to patient care.

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About NAACOS. The National Association of ACOs (NAACOS) represents more than 12 million beneficiary lives through hundreds of organizations participating in population health-focused payment and delivery models in Medicare, Medicaid, and commercial insurance. Models include the Medicare Shared Savings Program (MSSP), Next Generation ACOs, and alternative payment models supported by a myriad of commercial health plans and Medicare Advantage. NAACOS is a member-led and member-owned nonprofit organization that works to improve quality of care, outcomes, and healthcare cost efficiency.