



2025 MIPS Promoting Interoperability Performance Category: Response to the CDC's Temporary Pause in Electronic Case Reporting (eCR) Onboarding

Summary:

- The U.S. Centers for Disease Control and Prevention (CDC) has announced a temporary pause in onboarding new Healthcare Organizations (HCOs), which includes Merit-based Incentive Payment System (MIPS) eligible clinicians.
- CMS is announcing its intent to propose a response to this announcement in the CY 2026 Physician Fee Schedule (PFS) proposed rule.
- Availability and utilization of Electronic Case Reporting (eCR) measure exclusions.

Please refer to the [2025 MIPS Promoting Interoperability Measure Specifications \(ZIP, 4MB\)](#) for additional measure-specific information.

We understand that the CDC's announcement may impact clinicians' ability to complete and report on the eCR measure under the Promoting Interoperability performance category for MIPS. MIPS eligible clinicians are required to report on the eCR measure to earn a score for the Public Health and Clinical Data Exchange objective or claim an applicable exclusion. For more information regarding the eCR measure's specifications and scoring, please review Tables 77 through 79 in the CY 2025 Physician Fee Schedule (PFS) final rule ([89 FR 98418 through 98425](#)).

Further, as finalized in the CY 2023 PFS final rule ([87 FR 70071 through 70074](#)), beginning with the CY 2024 performance period/2026 MIPS payment year, MIPS eligible clinicians may spend only one performance period at the Pre-production and Validation (Option 1) level of active engagement for the eCR measure, then must progress to Validated Data Production (Option 2) level in the next performance period with their chosen Public Health Agency (PHA) for which they report the eCR measure or claim an applicable exclusion. In the CY 2023 PFS final rule, we also finalized a definition for the Validated Data Production (Option 2) level of active engagement, meaning that the MIPS eligible clinician has completed testing and validation of the electronic submission and is electronically submitting production data for the eCR measure to the PHA or clinical data registry (CDR).

Recently, the CDC announced a temporary pause in onboarding new HCOs to establish a sustainable long-term path for broadscale adoption and integration of healthcare and eCR data. Over the next couple months, CDC will be focusing on enhancing the integration and use of eCR data by PHAs and evaluating the onboarding process for HCOs. This action likely will result in significant delays in onboarding new HCOs, MIPS eligible

clinicians progressing from Option 1 to Option 2, and the ability to report “yes” to the measure through annual reporting.

CMS intends to address the CDC’s announcement, and its impact on MIPS eligible clinicians completing and reporting on the eCR measure in the CY 2026 PFS proposed rule. The CY 2026 PFS proposed rule will be published in the Summer of 2025, and we welcome feedback and public comment on any proposals that address the CDC’s onboarding activities. A listserv announcement will be sent once the proposed rule is published, and the public comment period opens.

In addition, MIPS eligible clinicians may be able to claim one of the three exclusions under the eCR measure and therefore receive full credit for the measure. Any MIPS eligible clinician meeting one or more of the following criteria may be excluded from reporting on the eCR measure if:

- (1) Does not treat or diagnose any reportable diseases for which data are collected by its jurisdiction’s reportable disease system during the performance period;
- (2) Operates in a jurisdiction for which no PHA is capable of receiving eCR data in the specific standards required to meet the certified electronic health record (EHR) technology (CEHRT) definition at the start of the performance period; or
- (3) Operates in a jurisdiction where no PHA has declared readiness to receive eCR data as of six months prior to the start of the performance period.

CMS interprets “capable of receiving eCR data in the specific standards required” in exclusion 2 to mean has the ability to advance, and has advanced, a MIPS eligible clinician registered with the PHA to Active Engagement Option 2: Validated Data Production, at the start of the performance period for MIPS eligible clinicians to achieve Validated Data Production under the MIPS Promoting Interoperability performance category.

For the Medicare Promoting Interoperability Program announcement, it is available on the [CMS QualityNet Hospital Inpatient Notifications](#) webpage.

Please do not respond directly to this email. If you have any questions regarding the MIPS Promoting Interoperability performance category, please contact the QPP Service Center by email at QPP@cms.hhs.gov, by creating a [QPP Service Center ticket](#), or by phone at 1-866-288-8292 (Monday – Friday, 8 a.m. – 8 p.m. ET). People who are deaf or hard of hearing can dial 711 to be connected to a Telecommunications Relay Services (TRS) Communications Assistant.

Please direct questions regarding CDC’s efforts to optimize eCR to the eCR mailbox at ecr@cdc.gov with the subject line “eCR Optimization”.