



2025 Merit-based Incentive Payment System (MIPS) Quality Measures Impacted by International Classification of Diseases, Tenth Revision (ICD-10) Coding Updates Effective October 1, 2025

MIPS Quality Measure Identified for Truncation for 2025 Performance Period:

- [Q491: Mismatch Repair \(MMR\) or Microsatellite Instability \(MSI\) Biomarker Testing Status](#). See the [Which Quality Measures are Impacted for the 2025 Performance Period?](#) section below for more information regarding truncation definition and scoring impacts.

What is the Policy for Identifying Impacted Quality Measures?

The ICD-10 code updates are effective annually on October 1. However, the MIPS quality measure specifications cannot be updated to account for such ICD-10 code updates until the next MIPS performance period. In the Calendar Year (CY) 2018 Medicare Physician Fee Schedule (PFS) Final Rule, the Centers for Medicare & Medicaid Services (CMS) established an annual review process to identify and analyze MIPS quality measures that are significantly impacted by the ICD-10 coding changes during the performance period ([82 FR 53714 through 53716](#)).

In the CY 2024 Medicare PFS Final Rule, the policy was amended to eliminate one of the criteria used to evaluate MIPS quality measures significantly impacted by ICD-10 coding changes during the annual review process. Specifically, the identification of measures that have changes to a minimum of 10% of ICD-10 codes; such criterion was replaced with a more general criterion that allows CMS to assess MIPS quality measures on a case-by-case basis to determine whether or not ICD-10 coding changes are significant ([88 FR 79368 through 79369](#)).

The criteria used to determine whether a MIPS quality measure is significantly impacted by ICD-10 coding changes are as follows:

- Coding updates that lead to changes in measure scope or intent will be considered significant changes since such changes could affect the applicability of the historical benchmark.
- Clinical guideline changes, new products, or procedures reflected in ICD-10 code updates.
- Coding updates due to feedback received from measure developers and stewards.

To determine if a MIPS quality measure was significantly impacted by ICD-10 code updates for the 2025 performance period, we compared the ICD-10 codes listed in the posted 2025 measure specifications with the ICD-10 codes that were deleted or added during the annual ICD-10 code updates effective October 1 of the performance period. If a MIPS quality measure is significantly impacted by ICD-10 coding changes, the MIPS quality measure will be suppressed (the measure is excluded from a MIPS eligible clinician's total measure

achievement points and total available measure achievement points) or truncated (performance will be based on the first 9 months (January through September) of the 12-month performance period) for the performance period ([42 CFR 414.1380\(b\)\(1\)\(vii\)\(A\)](#)).

Which Quality Measures are Impacted for the 2025 Performance Period?

As highlighted above, the following MIPS quality measure (see Table 1) is identified as being significantly impacted for the 2025 performance period due to the annual ICD-10 coding update.

Table 1: MIPS Quality Measure Identified for Truncation

Quality ID #	Measure Title	Collection Type	Measure Steward
491	Mismatch Repair (MMR) or Microsatellite Instability (MSI) Biomarker Testing Status	MIPS CQM	College of American Pathologists

As defined above, truncation to the 9-month period of January 1 to September 30 should be applied to the denominator criteria for the purpose of determining denominator eligibility for this quality measure. The numerator will function as currently specified for those patients that fall into the denominator during the 9-month period.

Scoring Impact

This truncated measure (Q491) will have performance assessed based on data from the 9 consecutive months of the performance period identified above. It will be scored according to its benchmark (provided that data completeness and case minimum requirements are met).

Where Do I Go for Assistance?

For additional questions related to the analysis of the ICD-10 code updates and/or impacted MIPS quality measures, please contact the Quality Payment Program at QPP@cms.hhs.gov or 1-866-288-8292 (Monday-Friday 8 a.m. – 8 p.m. ET) or submit a [QPP Service Center ticket](#). People who are deaf or hard of hearing can dial 711 to be connected to a [Telecommunications Relay Services](#) (TRS) Communications Assistant.

Version History

Date	Change Description
10/01/2025	Original version