2026 Proposed Changes to QPP

Changes proposed under the 2026 PFS Proposed Rule

Quality Category

Proposed changes to the Quality category

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Quality Category

CMS is proposing to **add** 5 new Quality measures

eCQMs

1. Diagnostic Delay of Venous Thromboembolism in Primary Care (Intermediate Outcome)
2. Screening for Abnormal Glucose Metabolism in Patients at Risk of Developing Diabetes (Process)

MIPS CQMs

1. Patient Reported Falls and Plan of Care (Process)
2. Prevalent Standardized Kidney Transplant Waitlist Ratio (PSWR) (Process)
3. Hepatitis C Virus (HCV): Sustained Virological Response (SVR) (Outcome)

Quality Category

CMS is proposing to **remove** 10 Quality measures

MIPS CQMs

1. Colonoscopy Interval for Patients with a History of Adenomatous Polyps
2. Sentinel Lymph Node Biopsy for Invasive Breast Cancer
3. Assessment of Mood Disorders and Psychosis for Patients with Parkinson's Disease
4. Cardiac Stress Imaging Not Meeting Appropriate Use Criteria
5. Overuse of Imaging for the Evaluation of Primary Headache
6. Perioperative Temperature Management
7. Non-Recommended Cervical Cancer Screening in Adolescent Females
8. Screening for Social Drivers of Health
9. Connection to Community Service Provider
10. Adult COVID-19 Vaccination Status

Quality Category

Removing Health Equity

CMS is proposing to remove "health equity" from the definition of high priority measures

Revising the Outcome Definition

The revised definition would be:
An outcome (including intermediate-outcome and patient- reported outcome), appropriate use, patient safety, efficiency, patient experience, care coordination, or opioid quality measure.

Quality Category

For ACOs submitting under APP, CMS is proposing changes to the APP Plus quality measure set

Removal

Screening for Social Drivers of Health (CMS 487) would be removed from the APP Plus quality measure set. It was supposed to be required in 2028.

Quality Category

CMS is proposing that ACOs continue to be limited to the following collection types:

eCQMs or Medicare CQMs

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(No CQMs starting in 2027 and still no CMS Web Interface starting in 2025)

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IA Category

Improvement Activities:

1. Improving Detection of Cognitive Impairment in Primary Care
2. Integrating Oral Health Care in Primary Care
3. Patient Safety in Use of Artificial Intelligence (AI)

CMS is proposing to **add** 3 new IA measures

IA Category

CMS is proposing to **remove** 7 IA measures

Improvement Activities:

1. IA_AHE_5: MIPS Eligible Clinician Leadership in Clinical Trials or CBPR
2. IA_AHE_8: Create and Implement an Anti-Racism Plan
3. IA_AHE_9: Implement Food Insecurity and Nutrition Risk Identification and Treatment Protocols
4. IA_AHE_11: Create and Implement a Plan to Improve Care for Lesbian, Gay, Bisexual, Transgender, and Queer Patients
5. IA_AHE_12: Practice Improvements that Engage Community Resources to Address Drivers of Health
6. IA_PM_26: Vaccine Achievement for Practice Staff: COVID-19, Influenza, and Hepatitis B
7. IA_PM_6: Use of Toolsets or Other Resources to Close Health and Health Care Inequities Across Communities
8. IA_ERP_3: COVID-19 Clinical Data Reporting with or without Clinical Trial

MIPS
MVP
APP

IA Category

CMS is proposing to remove the "Achieving Health Equity (AHE)" subcategory and add a new "Advancing Health and Wellness (AHW)" subcategory

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Promoting Interoperability (PI) Category

Proposed changes to the Promoting Interoperability category

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PI Category

Security Risk Analysis

Security Risk Analysis Measure: Adding a second attestation component for security risk management

New Attestation Statement

You must attest "Yes" or "No" to **having conducted security risk management** as required in addition to the existing measure requirement to attest "Yes" or "No" to **having conducted or reviewed a security risk analysis.**

A "No" response for the measure would continue to result in a total score of zero points for the Promoting Interoperability performance category.

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PI Category

New SAFER Guides

- **SAFER Guide Measure:** Updating to require use of the 2025 SAFER Guides instead of 2016

New Bonus Measure

- New Optional Bonus Measure: Public Health Reporting Using TEFCA

No Electronic Case Reporting

- Electronic Case Reporting: Proposing **to suppress this measure for CY 2025** due to CDC pausing onboarding

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Cost Category

Proposed changes to the Cost category

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MVP Reporting Framework

Proposed changes to the MVP reporting framework

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MVP Reporting Framework

New MVP Options:

1. Diagnostic Radiology
2. Interventional Radiology
3. Neuropsychology
4. Pathology
5. Podiatry
6. Vascular Surgery

CMS is proposing to **add** 6 new MVP options.

MVP Reporting Framework

CMS is proposing modifications to all 21 existing MVPs to align with quality measure and improvement activity inventory updates.

MVP Reporting Framework

Small Practices as MVP Groups

- Multispecialty small practices (15 or fewer clinicians) would be able to report MVPs as a group
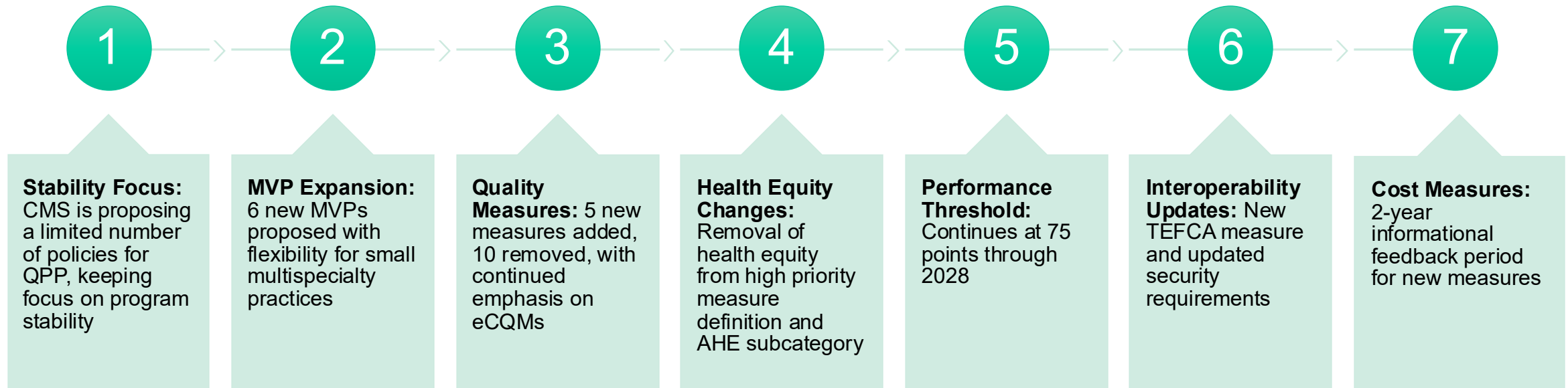
Small Practices Exempted from Subgroups

- Small practice multispecialty groups are not required to form subgroups in 2026

Small Practices Can Self-Select MVPs

- Groups are allowed to attest to their specialty composition during MVP registration instead of waiting for CMS to tell them.

Key Takeaways on QPP Changes in the 2026 PFS Proposed Rule

1 → **2** → **3** → **4** → **5** → **6** → **7**

Stability Focus: CMS is proposing a limited number of policies for QPP, keeping focus on program stability

MVP Expansion: 6 new MVPs proposed with flexibility for small multispecialty practices

Quality Measures: 5 new measures added, 10 removed, with continued emphasis on eCQMs

Health Equity Changes: Removal of health equity from high priority measure definition and AHE subcategory

Performance Threshold: Continues at 75 points through 2028

Interoperability Updates: New TEFCA measure and updated security requirements

Cost Measures: 2-year informational feedback period for new measures

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