Why the CY 2027 PFS Rule Gives Shar Savings ACOs Several Digital On-Ram Instead of One ePA Mandate: APP Plu Medicare eCQMs, the 95/75 Gates, Three CEHRT Paths, and the FHIR dQI Roadmap

JUL 23, 2026 • PAID

6

🎧 Podcast episode for paid subscriber only. Also available on Spotify.

Thoughts on Healthcare Markets & Technology

Why the CY 2027 PFS Rule Gives Shared Savings ACOs Several Digital On-Ramps Instead of One ePA Mandate: APP Plus, Medicare eCQMs, the 95/75 Gates, Three CEHRT Paths, and the FHIR dQM Roadmap

The most expensive misread of the CY 2027 PFS rule: people see ‘ePA’ near ‘ACO’ and think CMS just mandated electronic prior auth for Shared Savings orgs. It did not. Here is what actually happened...

Listen now

6 minutes ago · Thoughts on Healthcare

To listen to paid episodes in Apple or Spotify, link your Substack subscription via the s settings on those platforms (instructions inside the Substack app under Subscriptions →

Podcast).

Abstract

- The CY 2027 PFS proposed rule, CMS-1848-P (RIN 0938-AV82), does not mandate electronic prior auth for Shared Savings ACOs in 2027. It proposes quality and health-IT changes, and separately asks about future ePA and a fu FHIR digital-measure transition. Several on-ramps, not one gate.
- First survival skill: sort the pile. There are actual Shared Savings proposals, Shared Savings RFIs, look-alike proposals in other programs (MIPS, the Ambulatory Specialty Model), and one already-final payer rule (CMS-0057-F They are not the same thing and carry different force.
- The quality set: an eight-measure APP Plus (five ACO-reported clinical mea two admin-claims measures, CAHPS), dropping two prior measures.
- Legacy MIPS CQM reporting survives on purpose. Only 140 of 472 reconcile ACOs reported a MIPS CQM in preliminary PY 2025, up from 33 of 453 in 2023. Forcing a cutover now would strand investment.
- Medicare eCQMs are a scoped bridge: full electronic logic, but the populati limited to assigned Medicare beneficiaries, so multi-TIN ACOs don't have to aggregate all-payer data they can't reliably dedupe.
- Two separate gates people constantly merge: a 95 percent TIN-coverage test 75 percent measure-completeness test.
- CEHRT proof collapses from "report every PI measure" into one of three pa ePA is an RFI for CY 2028, not a rule. And the ASM category-zeroing consequence is not Shared Savings policy.

Table of Contents

1. CMS built several doors into digital ACOs, not one switch
2. Sort the pile first: four different legal buckets
3. The eight-measure APP Plus set
4. Why legacy MIPS CQM reporting survives on purpose
5. Medicare eCQMs, a scoped bridge with a matching problem
6. The 95 and the 75, two gates people keep merging
7. Three CEHRT evidence paths replace one PI score
8. ePA for ACOs is only a question, and ASM is a different animal
9. The payer API rail already moving, and the FHIR dQM roadmap
10. Where the burden actually goes

CMS built several doors into digital AC not one switch

The most common way to misread the CY 2027 Physician Fee Schedule rule is tc the letters “ePA” near the letters “ACO” and conclude that CMS just told Sharec Savings organizations to start doing electronic prior auth. It did not. What CMS actually did is more interesting and much easier to get wrong: it built several sep on-ramps into a digital operating model, some of them concrete proposals for 20 some of them questions about 2028 and beyond, and it laid them out in a docum large enough that the proposals and the musings are easy to blur together.

The right mental model is a set of doors, not a switch. There is a door for quality reporting that quietly shifts toward electronic measures without forcing anyone through it yet. There is a door for satisfying the certified-EHR requirement that to be one heavy obligation and is now a choose-one-of-three affair. And there is a labeled prior auth that is, for Shared Savings, still just a question CMS is asking threshold anyone has to clear. Whether those doors eventually converge into a si mandatory path is a real possibility CMS is clearly steering toward, but steering

toward something and requiring it are different verbs, and the whole art of read
this rule is keeping them straight.

← Previous