

the Patient Access electronic data availability requirement. AAFP, AADA, and AHA did not support the SAFER Guide proposal but ACC did. Commenters supported our other proposals.

Recommendation: (b)(5)

(b)(5)

Rural Impact: We anticipate no disproportionate impact on rural providers.

Cost Impact: We anticipate a very small increase due to the addition of the SAFER guide requirement.

21. QPP - Improvement Activities Performance Category

Issue: The 2021 Consolidated Appropriations Act requires the development of an improvement activity to promote the implementation and use of an electronic real-time benefit tool that conveys patient-specific real-time cost and coverage information with respect to prescription drugs. We are also seeking to address health equity with modifications to or addition to the Improvement Activity Inventory.

Background: We currently have 105 improvement activities within the Improvement Activities Inventory available for MIPS eligible clinicians to choose from.

Proposed: We proposed to modify the improvement activity titled “Drug Cost Transparency” to require an eligible clinician to use real-time benefit tools to lower beneficiary costs as required by the 2021 Consolidated Appropriations Act. To address health equity, we also proposed to modify six of the 22 current improvement activities that address health equity and add two new improvement activities in the Achieving Health Equity subcategory: 1) Create and Implement an Anti-Racism Plan and 2) Implement Food Insecurity and Nutrition Risk Identification and Treatment Protocols.

Summary of Public Comments: We have received stakeholder support with AMA and ACS each questioning an improvement activity.

Recommendation: (b)(5)

(b)(5)

Rural Impact: We anticipate no disproportionate impact on rural providers.

Cost Impact: We do not expect these changes to have an increased financial burden on stakeholders.