

Data Proposals for 2025 EHR Measures

This is a quick guide supplement to the [EHR Guidance Documentation](#). The data proposal portion is due no later than **5:00 p.m. Pacific Time on January 30, 2026**. The data proposal provides an overview of the planned metric submissions and how reporting requirements (e.g., minimum population threshold) will be met.

Data Proposal Fields

The following information (with column letters) of the [EHR Measures Reporting Template](#) must be completed in the *Data Reporting Template* tab for each organization/practice as part of the data proposal process:

- CCO and Organization information (A-D, G)
- EHR Details (E-F)
- # of Members empaneled (H-J)
- Report Type, Data Aggregation Level, Payer Type, Measurement Period for each measure:
 - Depression (K-M, S,T)
 - Hypertension (U-W, AB, AC)
 - Diabetes (AD-AF, AK, AL)
 - Smoking (AM-AO, AX, AY)
 - SBIRT (AZ-BB, BL, BM)

Details for these fields can be found in the column definition tab of the reporting template,

CCOs must also complete the questions in the *Data Proposal Questions* tab to provide additional information about the data submitted and ensure the data is complete.

OHA Validation of Data Proposal

OHA will review the Data Proposal and notify the CCO of the results no later than February 20, 2026. If OHA requests additional information or corrections, the CCO will have 10 business days to respond or revise the CCO EHR-Based Reporting Template fields. OHA review includes:

Minimum Population Thresholds

The minimum population threshold compares the CCO's initial population for reporting with its total physical health membership as of December of the reporting year:

empaneled members / # CCO members > threshold

Measure	MY2025 Threshold
Depression	70%
Hypertension	70%
Diabetes	70%
Smoking	45%
SBIRT	45%

The *Dashboard* tab shows if reporting thresholds have been met for each measure (CCOs must enter their population count on the *Instruction* tab for calculations to populate).

Data Proposal Questions

OHA will validate the data proposal against the MY2024 submission and confirm any rational for year to year changes (i.e. practices/organizations that are no longer reporting data). When appropriate a hardship request should be submitted.

Hardship Exception Requests

OHA recognizes that circumstances beyond a CCO's or an organization's control could prevent a CCO from being able to report data as planned. In appropriate circumstances, OHA grants [hardship exceptions](#) for:

- 1) A failure to meet the minimum population threshold parameter,
- 2) No longer reporting on measure(s) by an organization/practice previously included that has empaneled CCO members, and
- 3) A change in reporting from CCO Member Only in previous year to All Payer in the current year for the same organization or practice.

Additional Information

Additional information and details can be found in the [EHR Guidance Documentation](#)