Draft Recommendations Meaningful Use Stage 3

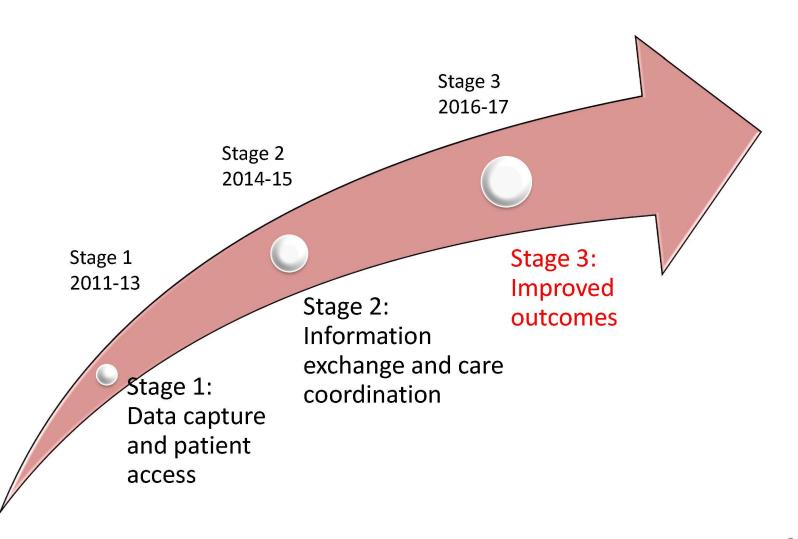
Meaningful Use Work Group
Paul Tang, chair
George Hripcsak, co-chair

Meaningful Use Workgroup Membership

- Paul Tang, Chair, Palo Alto Medical Center
- George Hripcsak, Co-Chair, Columbia University
- David Bates, Brigham & Women's Hospital*
- Christine Bechtel, National Partnership for Women & Families *
- Neil Calman, The Institute for Family Health
- Tim Cromwell, Department of Veterans
 Affairs
- Art Davidson , Denver Public Health
 Department *
- Paul Egerman , Software Entrepreneur
- Marty Fattig, Nemaha County Hospital (NCHNET)
- **Joe Francis, MD**, Veterans Administration

- Leslie Kelly Hall, Healthwise
- David Lansky, Pacific Business Group on Health
- Deven McGraw, Center for Democracy & Technology
- Marc Overhage, Siemens Healthcare
- **Greg Pace**, Social Security Administration
- Marty Rice, HRSA
- Robert Tagalicod, CMS/HHS
- Charlene Underwood, Siemens *
- Michael H. Zaroukian, Sparrow Health System
- Amy Zimmerman, Rhode Island
 Department of Health and Human Services

Stages of Meaningful Use *Improving Outcomes*



Original Principles for MU Recommendations

- Supports new model of care (e.g., team-based, outcomesoriented, population management)
- Addresses national health priorities (e.g., NQS, prevention, Partnerships for Patients, Million Hearts)
- Broad applicability (since MU is a floor)
 - Provider specialties (e.g., primary care, specialty care)
 - Patient health needs
 - Areas of the country
- Not "topped out" or not already driven by market forces
- Mature standards widely adopted or could be widely adopted by 2016 (for stage 3)

Lessons from Stages 1

Implications for Stage 3

Stage 1 Experience

- Substantial increase in adoption rates and effective use
- Mandatory floor creating network effects
- Thresholds consistently exceeded
- Consistent use across the years
- Reporting requirements have considerable costs and burden
- Prescriptive, "forced march" impacts available resources for innovation or to address local priorities

Implications for Stage 3

- Creating critical mass of users and data in electronic form
- Rising tide is floating boats (e.g., setup for patient engagement, HIE)
- Once MU functionality is implemented, it is used
- Gains from stage 1 (and 2) will persist
- Stage 3: Simplify and reduce reporting requirements
- Stage 3: Rely more heavily on market pull (e.g., new payment incentives); promote innovative approaches i.e., reward good behavior

Additional Goals for Stage 3

- Address key gaps (e.g., information exchange, patient engagement, reducing disparities) in EHR functionality that the market will not drive alone, but are essential for all providers
- Simplify MU objectives where higher level objective implies compliance with subsumed process objectives
- Consider alternative pathway where meeting performance and/or improvement thresholds deems satisfaction of subset of relevant MU functionality implicitly required to achieve performance/improvement

Simplification/Consolidation Work

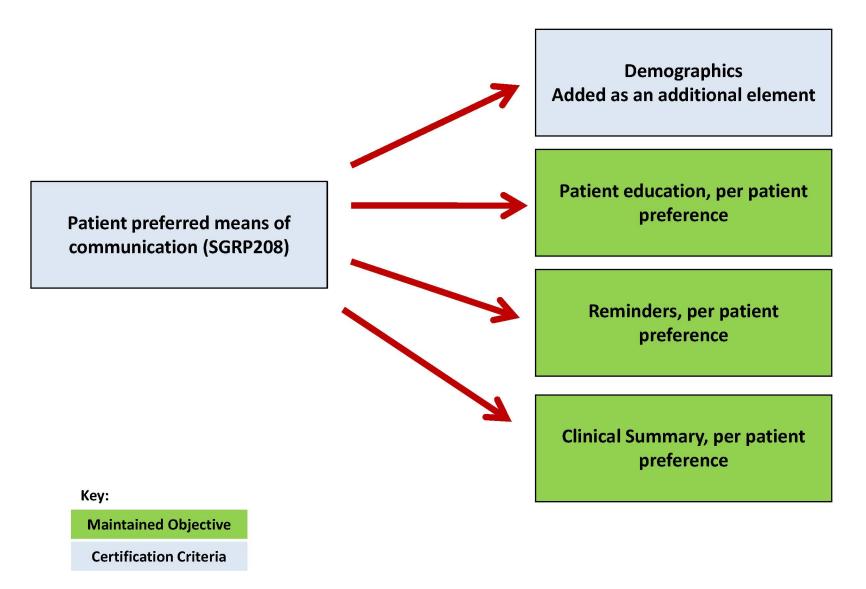
Simplification/Consolidation Summary

- 43 objectives, simplified to 27 (3 of the 26 are proposed for a future stage)
- All criteria included in certification
 - Focus on advanced uses (e.g. recording data vs. use data)
 - Credit for objectives that should be standard of practice after stages 1 and 2

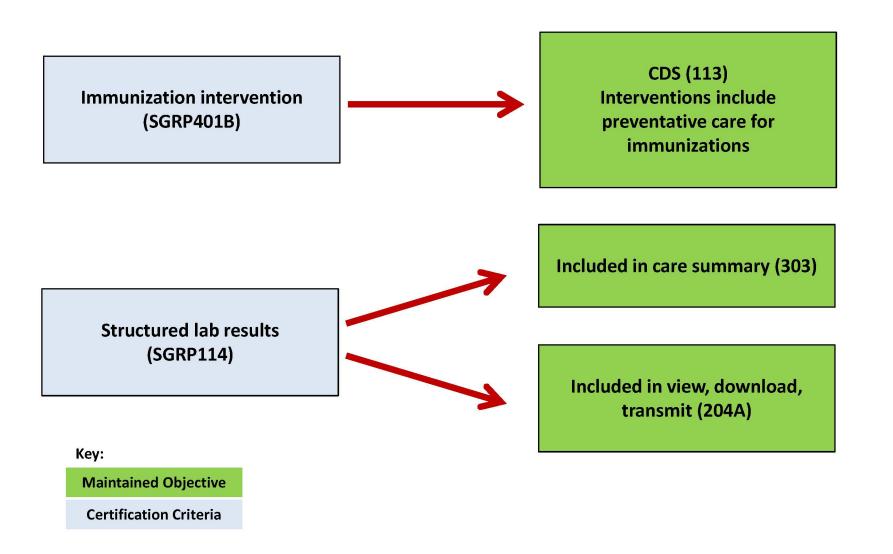
Types of Simplification/Consolidation

- 1. Advanced within concept of another objective
- Duplicative concepts objective becomes certification only
- 3. Demonstrated use and can trust that it will continue

1 - Advanced within Concept of Another Objective



2 - Duplicative Concepts



3 - Demonstrated Use

- Patient lists and dashboards (SGRP115)
 - Needed for population management and quality measurement
 - How to measure use?
 - Existing external drivers that will drive use (new models of care)

Simplification/Consolidation Summary

ID#	RFC Concept	Status after Consolidation	
SGRP101	CPOE	Certification Only - meds included in reconciliation (302), labs and rad included in	
		order tracking (122))	
SGRP103	eRx transmission and formulary	Certification Only - Demonstrated use by MU3	
SGRP104	Demographics	Certification Only (new items: SOGI, O/I codes, pt comm pref)	
SGRP105	Problem list	Certification Only - included in care summary and VDT	
SGRP106	Active med list	Certification Only - included in care summary and VDT	
SGRP107	Active med allergy list	Certification Only - included in care summary and VDT	
SGRP108	Vitals	Certification Only - included in care summary and VDT	
SGRP109	Smoking status (13 or older)	Certification Only - included in care summary and VDT	
SGRP112	Advance directive	Maintain	
SGRP113	CDS	Maintain (add immunization CDS (4018))	
SGRP114	Lab tests as structured data	Certification Only - included in care summary and VDT	
SGRP115	Patient lists and dashboards	Certification Only - Demonstrated use by MU3	
SGRP116	Reminders for follow-up	Maintain	
SGRP117	EH: eMAR	Maintain	
SGRP118	Imaging results (ECGs)	Maintain	
SGRP119	Record family Hx	Maintain, but also include in VDT (204A) and care summary (303)	
SGRP120	Record electronic notes	Maintain	
SGRP121	EH: Provide lab results to EPs	Maintain	
SGRP122	Order Tracking	Maintain (CPOE merged here)	
SGRP123	UDI	Newly added	
SGRP130	CPOE for referrals	Certification Only - integrate in ToC care summary (303)	
SGRP204A	VDT, ABBI	Maintain (add fam hx (119), amendments (204D))	
SGRP204B	PGHD	Maintain	
SGRP204D	Amendment to record online	Certification Only - integrate into VDT (204A)	
SGRP205	Clinical summary	Maintain (per pt preference)	
SGRP206	Patient education	Maintain (per pt preference)	
SGRP207	Secure messaging	Maintain	
SGRP208	Communication preferences	Certification Only - integrate into pt ed, clinical summary, reminders	
SGRP209	Identify clinical trials	Certification Only	
SGRP302	Reconcile meds, med allg, probs	Maintain	
SGRP303	Care summary	Maintain	
SGRP304	FUTURE - Care plan	Future Stage	
SGRP305	Referral loop	Maintain	
SGRP308	Notification of health event	Maintain	
SGRP125	FUTURE - RxHx adherence, PDMP	Future Stage	
SGRP127	FUTURE - Interdisc problem list	Certification Only - included into reconciliation (302)	
SGRP401A	Immunization registry	Maintain	
SGRP401B	CDS from immunization Hx	Certification Only - integrate into CDS (113)	
SGRP402A	Submission of ELR	Maintain	
SGRP402B	Case reports to PHA	Certification Only	
SGRP403	Syndromic surveillance data	Maintain	
SGRP404	Cancer registry		
SGRP405	Specialty registry	Merged registry objectives	
SGRP407	FUTURE - HAI rpts NHSN		
SGRP408	FUTURE - Adverse rpt to FDA/CDC	Future Stage	
SGRP308 SGRP125 SGRP127 SGRP401A SGRP401B SGRP402A SGRP402B SGRP403 SGRP404 SGRP405 SGRP407	Notification of health event FUTURE - RXHX adherence, PDMP FUTURE - Interdisc problem list Immunization registry CDS from immunization HX Submission of ELR Case reports to PHA Syndromic surveillance data Cancer registry Specialty registry FUTURE - HAI rpts NHSN	Maintain Future Stage Certification Only - included into reconciliation (302) Maintain Certification Only - integrate into CDS (113) Maintain Certification Only Maintain Merged registry objectives	

Simplification/Consolidation – Another View

Quality, safety, reducing health **Engaging patients & Improving care Population & public** disparities families coordination health Order tracking **Immunization registry VDT** ToC - Care summary eRx **CPOE** - referrals **ABBI ELR** Advanced directive **CPOE** Referral loop **Patient education** CDS Electronic notes Case reports to PHA Comm preference CDS for immun Pt list/dashboard Reconciliation **Synd Surveillance CDS** for lists **Demographics** Notify of health event **Clinical summary Registries** Reminders **Comm preference Smoking** Care plan **Cancer registry** Comm preference **Specialty registry** Inter prob list Vitals **Secure Messaging HAI** reports **Lab Results** EH: eMAR RxHx PDMP **PGHD Imaging results** Adverse event **Clinical trials EH: Lab results EP Amendment Family Hx**

Key:

Maintained Objective

Certification Criteria

Future Stage

Changed after

consolidation work

14

Simplification Update

- Reviewing items consolidated and categorizing into the following
 - Removal
 - removal as a use requirement
 - Implication
 - no reporting requirement, but there is an expectation that it will continue to happen
 - Consolidation
 - consolidated with another item and it needs to be measured
- Goal is to simplify and reduce reporting requirements

Subgroup 1: Improving quality, safety, efficiency and reducing health disparities

David Bates, Subgroup Lead George Hripcsak, MU WG Co-Chair

SGRP112: Advance Directive

Stage 2 Final Rule	Stage 3 Recommendations
EH MENU Objective: Record whether a patient 65	Ensure standards support in CDA by 2016
years old or older has an advance directive	EP MENU/EH Core Objective: Record whether a
EH MENU Measure: More than 50 percent of all	patient 65 years old or older has an advance directive
unique patients 65 years old or older admitted to the	EP MENU/EH Core Measure: More than 50 percent
eligible hospital's or CAH's inpatient department (POS	of all unique patients 65 years old or older admitted
21) during the EHR reporting period have an indication	to the eligible hospital's or CAH's inpatient
of an advance directive status recorded as structured	department (POS 21) during the EHR reporting period
data.	have an indication of an advance directive status
	recorded as structured data.

SGRP113: Clinical Decision Support

Stage 2 Final Rule	Stage 3 Recommendations
EP/EH Objective: Use	Objective: Use clinical decision support to improve performance on high priority health conditions
clinical decision support	Measure:
to improve performance on high-priority health	1. Implement 15 clinical decision support interventions or guidance related to five or more clinical quality measures that are
conditions	presented at a relevant point in patient care for the entire EHR reporting period. The 15 CDS interventions should include
	1' ' ''
Measure:	two or more of one or more interventions in each of the following areas, as applicable to the EP's specialty:
Implement five clinical decision support	Preventive care (including immunizations)
interventions related to	Chronic disease management, including hypertension* (e.g., diabetes, coronary artery disease)
four or more clinical	Appropriateness of lab and radiology orders
quality measures at a	Advanced medication-related decision support** (e.g., renal drug dosing)
relevant point in patient	Improving the accuracy or completeness of the problem list for one or more chronic conditions
care for the entire EHR reporting period. Absent	2. The EP, eligible hospital, or CAH has enabled the functionality for drug-drug and drug-allergy interaction checks for the
four clinical quality	entire EHR reporting period.
measures related to an	entile Enk reporting period.
EP, eligible hospital or	
CAH's scope of practice or	Certification criteria:
patient population, the clinical decision support	1. Ability to track CDS triggers, how the provider responded to improve the effectiveness of CDS interventions, and the reason
interventions must be	for overriding
related to high-priority	2. Ability to flag preference-sensitive conditions, and provide decision support materials for patients.
health conditions. It is	3. Capability to check for a maximum dose in addition to a weight based calculation.
suggested that one of the five clinical decision	4. Use of structured SIG standards
support interventions be	
related to improving	5. Ability for EHRs to consume external CDS interventions from central repositories (e.g., rules for drug-drug interactions,
healthcare efficiency.	rules for reporting diseases for public health departments immunization recommendations and rules, preference-sensitive
2. The EP, eligible	care lists)
hospital, or CAH has enabled and	6. Ability to use structured information within systems to support clinicians' maintenance of up-to-date accurate problem lists
implemented the	med lists, and med allergy lists. Systems provide decision support about additions, edits, and deletions for review and action,
functionality for drug-	but would not automatically add anything to these lists without professional action.
drug and drug-allergy	•EHR systems should provide functionality to code medication allergies including its related drug family to code related
interaction checks for the entire EHR reporting	reactions. Adapt and further develop existing standards to define the nature of reactions for allergies (i.e. severity).

period.

^{***} Phansalkar, S., van der Siis, H., Tucker, A., Desai, A., Bell, D., Teich, J., Middleton, B., Bates, D (2012). Drug-drug interactions that should be noninterruptive

SGRP116: Reminders

Stage 2 Final Rule	Stage 3 Recommendations
EP Objective: Use clinically relevant	EP Objective: Use clinically relevant clinical, social, or family history
information to identify patients who	information (beyond demographics) to identify patients who should
should receive reminders for	receive reminders for preventive/follow-up care
preventive/follow-up care and send	
these patients the reminder per	EP Measure: More than 20% of all unique patients who have had one
patient preference.	office visit with the EP within the 24 months prior to the beginning of the
	EHR reporting period were sent a reminder for preventive or follow-up
Measure: More than 10% of all unique	care (does not include appointments), in the format of the patient's
patients who have had two or more	preference (e.g., telephone, text, email), if the provider has the technical
office visits with the EP within the 24	capability.
months before the beginning of the	
EHR reporting period were sent a	Exclusion: Specialists may be excluded for prevention reminders (could
reminder, per patient preference	be more condition specific).
when available	Certification criteria: HITSC to identify what the communication preferences options should be for this objective. Providers should have the ability to select options that are technically feasible, these could include: Email, text, patient portal, telephone, regular mail.

SGRP117: eMAR

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
EH Objective: Automatically track	EH Objective: Automatically track		
medications from order to	medications from order to administration		
administration using assistive	using assistive technologies in conjunction		
technologies in conjunction with an	with an electronic medication		
electronic medication	administration record (eMAR)		
administration record (eMAR)	Measure:		
	1) More than 30% -50% of medication		
Measure: More than 10 percent of	orders created by authorized providers of		
medication orders created by	the eligible hospital's or CAH's inpatient or		
authorized providers of the eligible	emergency department (POS 21 or 23)		
hospital's or CAH's inpatient or	during the EHR reporting period are tracked		
emergency department (POS 21 or	using eMAR.		
23) during the EHR reporting period	2) Mismatches (situations in which a		
for which all doses are tracked using	provider dispenses a medication and/or		
eMAR.	dosing that is not intended) are tracked for		
	use in quality improvement.		

Imaging - 118

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions
MENU Objective: Imaging results	EP MENU/EH CORE Objective: Imaging	Standards	What
consisting of the image itself and	results consisting of the image itself and	work needed	barriers
any explanation or other	any explanation or other accompanying	to present	could be
accompanying information are	information are accessible through	imaging and	encounter
accessible through Certified EHR	Certified EHR Technology.	radiation	ed in
Technology.	EP MENU/EH CORE Measure: More than	dosing	moving
	10 imaging study encounters (anything	information to	this to
MENU Measure: More than 10	associated with an order, e.g., radiology,	the patient	core?
percent of all tests whose result is	photographs, images of ECG), ordered by	including the	
one or more images ordered by the	the EP or by an authorized provider of the	part of the	
EP or by an authorized provider of	eligible hospital or CAH for patients	body was	
the eligible hospital or CAH for	admitted to its inpatient or emergency	radiated?	
patients admitted to its inpatient or	department (POS 21 and 23) during the		
emergency department (POS 21 and	EHR reporting period are accessible (e.g.		
23) during the EHR reporting period	viewed directly in the EHR or a link to a		
are accessible through Certified EHR	separate system reached via the EHR)		
Technology.	through Certified EHR Technology		
	Certification criteria: CEHRT should be		
	able to display along with the image the		
	radiation exposure associated with the		
	imaging study.		

Family History – 119 No Change

Stage 2 Final Rule	Stage 3 Recommendations
MENU Objective: Record patient family health history as structured data	MENU Objective: Record patient family health history as structured data
MENU Measure: More than 20 percent of all unique patients seen by the EP or admitted to the eligible hospital or CAH's inpatient or emergency department (POS 21 or 23) during the EHR reporting period have a structured data entry for one or more first-degree relatives	MENU Measure: More than 20 percent of all unique patients seen by the EP or admitted to the eligible hospital or CAH's inpatient or emergency department (POS 21 or 23) during the EHR reporting period have a structured data entry for one or more first-degree relatives
	Certification criteria: Make sure that every appropriate CDS intervention can take into
	account family history for outreach (need to move that functionality along as part of preventative outreach).

Electronic Notes - 120

Stage 2 Final Rule	Stage 3 Recommendations
MENU Objective: Record electronic notes in patient records MENU Measure: Enter at least one electronic progress note created, edited and signed by an eligible professional for more than 30 percent of unique patient office visits. Notes must be text-searchable. Non-searchable scanned notes do not qualify but this does not mean that all of the content has to be character text. Drawings and other content can be included with text notes under this measure. MENU Measure: Enter at least one electronic progress note created, edited, and signed by an authorized provider of the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23) for more than 30 percent of unique patients admitted to the eligible hospital or CAH's inpatient or emergency department during the EHR reporting period. Electronic progress notes must be text-searchable. Non-searchable, scanned notes do not qualify, but this does not mean that all of the content has to be character text. Drawings and other content can be included with text notes under this measure.	CORE EP/EH objective: Record electronic notes in patient records EP: Within four calendar days, record an electronic progress note, authored by the eligible professional, for more than 30 % of unique patient office visits. Notes must be text-searchable. Non-searchable scanned notes do not qualify but this does not mean that all of the content has to be character text. Drawings and other content can be included with text notes under this measure EH: Within four calendar days of admission, record an electronic progress note (excluding the discharge summary) created, edited, and signed by an authorized provider of the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23) for more than 30 percent of unique patients.

Hospital Labs - 121

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
EH MENU Objective: Provide structured electronic lab results to ambulatory providers	EH CORE Objective: Provide structured electronic lab results to eligible professionals.		
EH MENU Measure: Hospital labs send structured electronic clinical lab results to the ordering provider for more than 20 percent of electronic lab orders received	EH CORE Measure: Hospital labs send (directly or indirectly using LOINC) structured electronic clinical lab results to the ordering provider for more than 80%-50% of electronic lab orders received. Will address threshold based upon stage 2 experience.		

Order Tracking - 122

Stage 2 Final Rule	Stage 3 Recommendations	
NEW	EP Objective: The EHR is able to assist with follow-up on orders to	
	improve the management of results.	
	EP Measure: 10% of test results, including those which were not	
	completed are acknowledged within 3 business days of when the test	
	was performed.	
	EP Measure: 10% of results (e.g., consult requests (referrals),	
	laboratory, radiology, pathology) are acknowledged within 3 business	
	days of when the request/test is resulted.	
	Certification Criteria:	
	EHRs must have the ability to:	
	 identify abnormal test results as determined by the laboratory 	
	•provide the option at ordering time for the provider to indicate a due	
	date for any order	
	 notify the ordering provider when results are available or not completed by a certain time 	
	•record date and time that results are reviewed and by whom	

UDI - 123

Stage 2 Final Rule	Stage 3 Recommendations
NEW	MENU objective: EPs and EHs should record the FDA Unique Device Identifier (UDI) when patients have devices implanted for each newly implanted device.
	MENU Measure : EPs and EHs should record the UDI when patients have the device implanted for 80% of patients seen within the EHR reporting period.
	Definition of a Medical Device (FD&C Act) Section 201(h): "A medical device is: an instrument, apparatus, implement, machine, contrivance, implant, in vitro reagent, or other similar or related article, including a component part, or accessory which is: • recognized in the official National Formulary, or the United States Pharmacopoeia, or any supplement to them, intended for use in the diagnosis of disease or other conditions, or in the cure, mitigation, treatment, or prevention of disease, in man or other animals, or •intended to affect the structure or any function of the body of man or other animals, and which does not achieve its primary intended purposes through chemical action within or on the body of man or other animals and which is not dependent upon being metabolized for the achievement of any of its primary intended purposes."

CPOE - 101

2 22.82 = 1 111011 110112
Eligible Provider (EP) Objective: Use
computerized provider order entry (CPOE) for
medication, laboratory and radiology orders
directly entered by any licensed healthcare
professional who can enter orders into the
medical record per state, local and professional
guidelines

Stage 2 Final Rule

Eligible Hospital (EH) Objective: Use computerized provider order entry (CPOE) for medication, laboratory and radiology orders directly entered by any licensed healthcare professional who can enter orders into the medical record per state, local and professional guidelines

EP/EH Measure: More than 60 percent of medication, 30 percent of laboratory, and 30 percent of radiology orders created by the EP or authorized providers of the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23) during the EHR reporting period are recorded using CPOE.

Stage 3 Recommendations

Objective: Use computerized provider order entry (CPOE) for medication, laboratory and radiology orders directly entered by any licensed healthcare professional who can enter orders into the medical record per State, local and professional guidelines to create the first record of the order.

CPOE for medications includes drug-drug interaction (DDI) checking for "never" combinations as determined by an externally vetted list.

Measure: More than 60% of medication, laboratory, and radiology orders created by the EP or authorized providers of the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23) during the EHR reporting period are recorded using CPOE

Certification Criteria: EHR must be able to consume an externally supplied list of "never" DDIs, using RxNorm and NDF-RT standards along with a TBD DDI reactions value set.

Certification Criteria for EPs:

EHR must have the ability to transmit lab orders using the lab order and results Interface guidelines produced by the S&I Framework Initiative.

SGRP103: ePrescribing

Stage 2 Final Rule	Stage 3 Recommendations
EP/EH Objective: Generate and transmit	EP Objective: Generate and transmit permissible
permissible prescriptions electronically (eRx)	prescriptions electronically (eRx)
	EP Measure: More than 50% of all permissible
Measure: More than 50% of all permissible	prescriptions written by the EP are compared to at least
prescriptions, or all prescriptions written by the EP	one drug formulary (reviewed for generic substitutions)
and queried for a drug formulary and transmitted	transmitted electronically using Certified EHR
electronically using CEHRT.	Technology.
	EH Objective: Generate and transmit permissible
EH MENU Objective: Generate and transmit	discharge prescriptions electronically (eRx)
permissible discharge prescriptions electronically	EH Measure: More than 30% of hospital discharge
(eRx)	medication orders for permissible prescriptions (for new
	or changed prescriptions) are compared to at least one
EH MENU Measure: More than 10 percent of	drug formulary and transmitted electronically using
hospital discharge medication orders for	Certified EHR Technology
permissible prescriptions (for new, changed, and	
refilled prescriptions) are queried for a drug	
formulary and transmitted electronically using	
Certified EHR Technology	

Demographics – SGRP104

Stage 3 Recommendations	Proposed for Future Stage
Certification criteria:	
Patient preferred method of communication	
Occupation and industry codes	
Sexual orientation, gender identity (optional fields)	
Disability status	
Differentiate between patient reported & medically determined	
Need to continue standards work	
Certification criteria: HITSC to identify what the communication preferences	
options should be for the clinical summary, reminders, patient educational	
material objectives (this will correlate to the patient's preferred format in	
each of these objectives). Providers should have the ability to select options	
that are technically feasible for them, these could include: Email, text,	
patient portal, telephone, regular mail.	

Problem List- 105

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage
Consolidated in summary of care objective Maintain an up-to-date problem list of current and active diagnoses	Certification criteria: EHR systems should provide functionality to help maintain up-to-date, accurate problem list Certification criteria: Use of lab test results, medications, and vital signs (BP, ht, wt, BMI), to support clinicians' maintenance of up-to-date accurate problem lists. Systems provide decision support about additions, edits, and deletions for clinicians' review and action. For example, if diabetes is not on the problem list but hypoglycemic medications are on the medication list: the EHR system might ask the provider whether diabetes should be on the problem list. It would not automatically add anything to the problem list without professional action.	Patient input to reconciliation of problems

Medication List - 106

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
Consolidated	Certification criteria: EHR systems	Certification criteria: Use	How to incorporate into
with	should provide functionality to help	other EHR data such as	certification criteria for
summary of	maintain up-to-date, accurate	medications filled or	pilot testing?
care -	medication list	dispensed, or free text	The intent is that EHR
Maintain active medication list	Certification criteria: Use of problems and lab test results to support clinicians' maintenance of up-to-date accurate medication lists. Systems provide decision support about additions, edits, and deletions for clinicians' review. For example, an antibiotic (not for acne) has been on the medication list for over say a month, the EHR system might ask the provider whether the medication is a chronic medication. The system will not make any changes without professional approval.	searching for medications to support maintenance of up-to-date and accurate medication lists.	vendors would provide functionality to help maintain functionality for active medication lists, not that they supply the actual knowledge for the rules.

Med Allergy

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
Consolidated with summary of care - Maintain active	Certification criteria: EHR systems should provide functionality to	Contraindications that could include adverse reactions and	The intent is that EHR vendors would provide functionality
medication allergy list	code medication allergies including its related drug family to code related reactions.	intolerance.	to help maintain functionality for active medication allergy lists, not that they supply the actual knowledge for the rules.

Vitals - 108

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
Objective: Record and chart changes in	Retire measure because it		Do commenters
vital signs:	is topped out (achieved		agree with
Height/length	80% threshold). Track		retiring the
Weight	progress to improve		measure, or
Blood pressure (age 3 and over)	outcomes via CQM NQF		should we
Calculate and display BMI	0018		continue this
Plot and display growth charts for			objective?
patients 0-20 years, including BMI			Continuing the
			measure would
Measure: More than 80 percent of all			mean an
unique patients seen by the EP or			additional
admitted to the eligible hospital's or			number of
CAH's inpatient or emergency			objectives that
department (POS 21 or 23) during the			providers will
EHR reporting period have blood			need to attest
pressure (for patients age 3 and over			to.
only) and height/length and weight (for			
all ages) recorded as structured data			

Smoking - 109

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
EP/EH Objective: Record smoking	Retire measure because it is		Do commenters
status for patients 13 years old or	topped out (achieved 80%		agree with retiring
older	threshold). Track progress to		the measure, or
	improve outcomes via CQM NQF		should we continue
Measure: More than 80 percent of	0028		this objective?
all unique patients 13 years old or			Continuing the
older seen by the EP or admitted to			measure would
the eligible hospital's or CAH's			mean an additional
inpatient or emergency			number of
departments (POS 21 or 23) during			objectives that
the EHR reporting period have			providers will need
smoking status recorded as			to attest to.
structured data			

Lab results - 114

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
EP/EH Objective: Incorporate	Objective: Incorporate clinical lab-		
clinical lab-test results into Certified	test results into EHR as structured		
EHR Technology as structured data	data		
Measure: More than 55 percent of	Measure: More than 80% of all		
all clinical lab tests results ordered	clinical lab tests results ordered by		
by the EP or by authorized providers	the EP or by authorized providers		
of the eligible hospital or CAH for	of the eligible hospital or CAH for		
patients admitted to its inpatient or	patients admitted to its inpatient		
emergency department (POS 21 or	or emergency department (POS		
23 during the EHR reporting period	21 or 23) during the EHR reporting		
whose results are either in a	period whose results are either in		
positive/negative affirmation or	a positive/negative or numerical		
numerical format are incorporated	format are incorporated in		
in Certified EHR Technology as	Certified EHR Technology as		
structured data	structured data		

Patient List -115

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
EP CORE Objective: Generate	EP Objective: Generate lists		
lists of patients by specific	of patients for multiple		
conditions to use for quality	specific conditions and		
improvement, reduction of	present near real-time (vs.		
disparities, research, or	retrospective reporting)		
outreach	patient-oriented dashboards		
	to use for quality		
EP CORE Measure: Generate at	improvement, reduction of		
least one report listing patients	disparities, research, or		
of the EP, eligible hospital or	outreach reports.		
CAH with a specific condition.	Dashboards are incorporated		
	into the EHR's clinical		
	workflow for the care		
	coordinator or the provider.		
	It is actionable and not a		
	retrospective report.		

Certification ONLY

CPOE Referrals - 130

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
New	Objective: Use computerized provider order		
	entry for consults requests and transfer of care		
	orders directly entered by any licensed		
	healthcare professional who can enter orders		
	into the medical record per State, local and		
	professional guidelines to create the first record		
	of the order.		
	Measure: More than 20% of referrals/transition		
	of care orders created by the EP or authorized		
	providers of the eligible hospital's or CAH's		
	inpatient or emergency department (POS 21 or		
	23) during the EHR reporting period are		
	recorded.		

Subgroup 2 - Engaging Patients and Families

Christine Bechtel, Subgroup Lead Paul Tang, MU WG Chair

VDT - 204 A (I)

Stage 2 Final Rule

EP Objective: Provide patients the ability to view online, download, and transmit (VDT) their health information within 4 business days of the information being available to the EP.

EP Measure: 1. More than 50 percent of all unique patients seen by the EP during the EHR reporting period are provided timely (within 4 business days after the information is available to the EP) online access to their health information subject to the EP's discretion to withhold certain information.

2. More than 5 percent of all unique patients seen by the EP during the EHR reporting period (or their authorized representatives) view, download, or transmit to a third party their health information.

EH Objective: Provide patients the ability to view online, download, and transmit information about a hospital admission

- 1. More than 50 percent of all patients who are discharged from the inpatient or emergency department (POS 21 or 23) of an eligible hospital or CAH have their information available online within 36 hours of discharge
- 2. More than 5 percent of all patients (or their authorized representatives) who are discharged from the inpatient or emergency department (POS 21 or 23) of an eligible hospital or CAH view, download or transmit to a third party their information during the reporting period.

Stage 3 Recommendations

- •EPs should make information **available within 24 hours** if generated during the course of a visit
- •For labs or other types of information not generated within the course of the visit, it is made available to patients within four (4) business days of information becoming available to EPs
 •Potential to increase both thresholds (% offer and % use) based upon experience in Stage 2
 •Add optional item: family history

Note: Depending on experience in Stage 2, CMS may want to give credit to some providers (e.g. specialists) for view/download/transmit where the patient has requested that they prefer info to be sent to a location they specify (such as another provider portal or PHR), rather than only making available information on the provider's portal.

Certification Criteria: CEHRT should provide the ability for patients to designate to whom and when a summary of care document is sent to a patient-designated recipient, building upon the Automated Blue Button Initiative (ABBI)).

Measure: Patient preferences are captured for 50% of unique patients seen within the EHR reporting period. Preferences will indicate to whom and when (i.e. pre-set automated & ondemand) a summary of care document is sent or an indication on no preferences. Examples of designated recipients:

*a one-time request to send information from specialist to primary care
*a standing request to always send an updated care summary when certain events arise, such
as a change in medication or the completion of new tests or procedures

*No preferences

Amendments - 204 D (I)

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
New	Provide patients with		
	an easy way to request		
	an amendment to their		
	record online (e.g.,		
	offer corrections,		
	additions, or updates to		
	the record)		

PGHD – 204B

Stage 2	Stage 3 Recommendations		
New	EP/EH MENU Objective: Patients have the ability to electronically submit patient-generated		
	health information.		
	EP/EH MENU Measure: Provide the ability to electronically submit patient-generated health		
	information through structured or semi-structured questionnaires (e.g., screening		
	questionnaires, intake forms, risk assessment, functional status) for more than 10 percent of		
	all unique patients seen by the EP during the EHR reporting period.		
	Standards work needed to incorporate and acknowledge PGHD – feedback from HITSC needed.		
	Certification criteria for devices, continue to work with the standards committee. Consumer technology will have information by the end of the August.		

Clinical Summary/AVS - 205

Stage 2 Final Rule	Stage 3 Recommendations
EP Objective: Provide clinical summaries for patients for each office visit EP Measure: Clinical summaries provided to patients or patient-authorized representatives within 1 business day for more than 50 percent of office visits.	The clinical summary should be pertinent to the office visit, not just an abstract from the medical record. EP Objective: An office-visit summary is provided to a patient or patient-authorized representative with relevant and actionable information and instructions pertaining to the visit in the format requested as indicated by the patient. EP Measure: An office visit summary is provided to a patient or patient-authorized representative with relevant and actionable information and instructions pertaining to the visit in the format requested as indicated by the patient (e.g., available online, via email, print out of summary, etc.),if the provider has the technical capability within 1 business day for more than 50 percent of office visits. Certification criteria #1: Intent is to make sure the EHR can draw from the range of existing specified information and enable providers to include and exclude data based upon patient needs. Certification criteria #2: HITSC to identify what the communication preferences options should be . Providers should have the ability to select options that are technically feasible, these could include: Email, patient portal, regular mail.

Patient Education - 206 (I)

Stage 2 I illai Itale
EP/EH Objective: Use Certified EHR
Technology to identify patient-specific
education resources and provide those
resources to the patient

EP CORE Measure: Patient specific education resources identified by CEHRT are provided to patients for more than 10 percent of all unique patients with office visits seen by the EP during the EHR reporting period

EH CORE Measure: More than 10 percent of all unique patients admitted to the eligible hospital's or CAH's inpatient or emergency departments (POS 21 or 23) are provided patient- specific education resources identified by Certified EHR Technology

Stage 3 Recommendations

Additional language support: For the top 5 non-English languages spoken nationally, provide 80% of patient-specific education materials in at least one of those languages based on EP's or EH's local population, where publically available.

Objective: Provide patient specific educational material in at least one non-English language, in the format preferred by the patient, if the provider has the technical capability

Measure: Deliver at least one patient specific educational material to one patient in that patient's preferred non-English language identified by CEHRT and in the patient's preferred format (e.g., online, print-out from CEHRT).

Certification criteria #1: Expand the InfoButton standard to include disability status. Disability status needs to be defined and flagged at the point of entry (e.g. registration or appointment gathering).

Certification criteria #2: HITSC to identify what the communication preferences options should be . Providers should have the ability to select options that are technically feasible, these could include: Email, patient portal, regular mail.

Secure Messaging - 207

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
EP Objective: Use secure electronic messaging to communicate with patients on relevant health information EP Measure: A secure message was sent using the electronic messaging function of Certified EHR Technology by more than 5 percent of unique patients (or their authorized representatives) seen by the EP during the EHR reporting period	Measure: More than 10%* 5% of patients use secure electronic messaging to communicate with EPs Certification requirement: Provide the capability to: 1. measure and report the response timeframe 2. for the patient to indicate that no response is needed 3. mode of response (e.g., telephone, secure message)	Create capacity for electronic episodes of care (telemetry devices, etc) and to do e-referrals and e-consults	*What would be an appropriate increase in threshold based upon evidence and experience?

Communication Preference – 208 Consolidated

Certification ONLY

Stage 2 Final Rule	Stage 3 Recommendations		
Not included	EP and EH Measure: Record communication preferences for 20% of patients, based		
separately (in	on how (e.g., the medium) patients would like to receive information for certain		
reminder objective)	purposes (including appointment reminders, reminders for follow up and preventive		
	care, referrals, after visit summaries and test results).		
	Certification criteria: HITSC to identify what the communication preferences		
	options should be for the clinical summary, reminders, patient educational material		
	objectives (this will correlate to the patient's preferred format in each of these		
	objectives). Providers should have the option to select options that are technically		
	feasible for them, these could include: Email, text, patient portal, telephone,		
	regular mail.		

Certification ONLY

Clinical Trial Query – 209

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
New	Certification Criteria: Capability for CEHRT to		The goal of this objective is to
	query research enrollment systems to identify		facilitate identification of
	available clinical trials.		patients who might be eligible
			for a clinical trial, if they are
			interested. The EHR would
			query available clinical trial
			registries and identify
			potentially relevant trials based
			on patient's health condition,
			location, and other basic facts.
			Ultimately, the EHR would not
			be able to determine final
			eligibility for the trial; it would
			only be able to identify possibly
			relevant trial opportunities.

Subgroup 3 – Improving Care Coordination

Charlene Underwood, Subgroup Lead Paul Tang, MU WG Chair

Reconciliation - 302

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage
EP/EH CORE Objective: The EP/EH who receives a patient from another setting of care or provider of care or believes an encounter is relevant should perform medication reconciliation.	EP / EH / CAH Objective: The EP, EH, or CAH who receives a patient from another setting of care or provider of care or believes an encounter is relevant should perform reconciliation for: - medications - medication allergies - problems	Reconciliation of contraindications (any medical reason for not performing a particular therapy; any condition, clinical symptom, or circumstance indicating that the use of an otherwise advisable intervention in some particular line of treatment is improper, undesirable, or inappropriate)
EP/EH CORE Measure: The EP, eligible hospital or CAH performs medication reconciliation for more than 50% of transitions of care in which the patient is transitioned into the care of the EP or admitted to the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23)	EP / EH / CAH Measure: The EP, EH, or CAH who receives a patient from another setting of care or provider of care or believes an encounter is relevant performs reconciliation for medications for more than 50% of those patients. transitions of care, and it performs reconciliation for medication allergies, and problems for more than 10% of transitions of care in which the patient is transitioned into the care of the EP or admitted to the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23). Certification criteria: CDS intelligence to ensure lists are accurate (see SGRP113 as well)	Standards work is necessary to address these gaps: There is no defined standard "domain" model for allergy/intolerance/condition/problem nor any practice model that supports a distinction. While there is an ability to articulate differences, these are complex relationships. There are no well defined universal codes or use of them. The codes in stage 2 like RxNorm and SNOMED are not widely used and not appropriately tailored and in practice, often conflict with codes used for other work / documentation.

Care Summary - 303

Stage 2 Final Rule

EP/EH CORE Objective: The EP/EH/CAH who transitions their patient to another setting of care or provider of care or refers their patient to another provider of care provides summary care record for each transition of care or referral.

CORE Measure: 1. The EP, eligible hospital, or CAH that transitions or refers their patient to another setting of care or provider of care provides a summary of care record for more than 50 percent of transitions of care and referrals. – Data Sets 3, 4, 5

- 2. The EP, eligible hospital or CAH that transitions or refers their patient to another setting of care or provider of care provides a summary of care record for more than 10% of such transitions and referrals either (a) electronically transmitted using CEHRT to a recipient or (b) where the recipient receives the summary of care record via exchange facilitated by an organization that is a NwHIN Exchange participant or in a manner that is consistent with the governance mechanism ONC establishes for the nationwide health information network.
- 3. An EP, eligible hospital or CAH must satisfy one of the two following criteria:
- (A) conducts one or more successful electronic exchanges of a summary of care document, as part of which is counted in "measure 2" (for EPs the measure at §495.6(j)(14)(ii) (B) and for eligible hospitals and CAHs the measure at §495.6(l)(11)(ii)(B)) with a recipient who has EHR technology that was developed by a different EHR technology developer than the sender's EHR technology certified to 45 CFR 170.314(b)(2); or
- (B) conducts one or more successful tests with the CMS designated test EHR during the EHR reporting period.

Stage 3 Recommendations

EP/ EH / CAH Objective: EP/EH/CAH who transfers their patient to another setting of care (including home), requests a consult from a provider in another setting of care, or provides consultation results to a provider in another setting of care provides a summary of care record that pertains to the type of transition:

- Transfers of care from one site of care to another (e.g.. Hospital to SNF, PCP, HHA, etc...; SNF, PCP, etc... to HHA; PCP to new PCP)
- Consult (referral) request (e.g., PCP to Specialist; PCP, SNF, etc... to ED)
- Consult result note (e.g. ER note, consult note))

Items for Inclusion	Transfers of care from one site of care to another	Consult Request	Consult Result Note
 Concise narrative in support of care transitions (free text e.g., 	Required	Required	Required
capturing current care synopsis expectations for transition and / or			
consult (referral))			
2.Contact information for professional care team members, including	Required	Required	Optional
primary care provider, role and contact information (free text is			
permissible)			
3. Indication of whether there is a designated family or informal	Required	Required	Optional
caregiver who is playing a significant role in the patient's care (Yes/No)			
4. Overarching patient goals and/ or problem specific goals (free text is	Required	Optional	Optional
permissible)			
5. Patient Instructions and / or suggested and/or planned interventions	Required	Optional	Optional
for care during transition and / or for 48 hours afterwards (free text is			
permissible)			

Measure: The EP, EH, or CAH that transfers their patient to another setting of care (including home), requests a consult from a provider in another setting of care, or provides consultation results to a provider in another setting of care, provides a summary of care record for 6550% of transitions (consult note, consult request, transfer of care, as indicated above) and at least 30 10%* electronically.

Certification criteria #1: EHR is able to set aside a concise narrative section in the summary of care document that allows the provider to document clinically relevant rationale such as reason for transition and / or consult request.

Certification criteria#2: Ability to automatically populate a consult request form for specific purposes, including a referral to a smoking quit line.

Certification criteria #3: Care team should include all care team members as defined in the consolidated CDA

Referral loop – 305 Consolidated in Care Summary 303

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
New	EP / EH / CAH Objective: EP/EH/CAH to whom a patient is referred	Continue working to	The HITPC would
	acknowledges receipt of external information and provides referral	close the loop with an	appreciate
	results to the requesting provider, thereby beginning to close the loop.	acknowledgement of	comments on the
		order receipt and	return of test
	Measure: For patients referred during an EHR reporting period, referral	tracking for completion.	results to the
	results generated from the EHR, 50% are returned to the requestor and		referring provider.
	10% of those are returned electronically*		
	Certification Criteria: Include data set defined by S&I Longitudinal		
	Coordination of Care WG and expected to complete HL7 balloting for		
	inclusion in the C-CDA by Summer 2013: Shared Care Encounter		
	Summary_(Consultation Summary, Return from the ED to the referring		
	facility, Office Visit)		
	Certification Criteria: Include standards for referral requests that		
	require authorizations (or pre-certifications) for procedure, surgery, lab,		
	radiology, test orders		
	*This builds upon the clinical quality measure (CQM) in stage 2 for		
	closing the referral loop,CMS50v1 (NQF TBD)		

Future Stage

Care Plan - 304

ID#	Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
ID# 304	-		EP/EH / CAH Objective: EP/EH/CAH who transitions their patient to another site of care or refers their patient to another provider of care For each transition of site of care, provide the care plan information, including the following elements as applicable: •Medical diagnoses and stages •Functional status, including ADLs •Relevant social and financial information (free text) •Most likely course of illness or condition, in broad terms (free text) •Cross-setting care team member list, including the primary contact from each active provider setting, including primary care, relevant specialists, and caregiver •The patient's long-term goal(s) for care, including time frame (not specific to setting) and initial steps toward meeting these goals •Specific advance care plan (Physician Orders for Life-Sustaining Treatment (POLST)) and the care setting in which it was executed. For each consult request, provide a care plan if one exists • An up-to-date interdisciplinary problem list inclusive of versioning in	How might we advance the concept of an electronic shared care planning and collaboration tool that crosses care settings and providers, allows for and encourages team based care, and includes the patient and their non-professional caregivers? Interested in experience to date and the lessons learned. Think through these priority use cases: 1. Patient going home from an acute care hospital admission 2. Patient in nursing home going to ED for emergency assessment and returning to nursing home 3. Patient seeing multiple ambulatory specialists needing care coordination with primary care 4. Patient going home from either hospital and / or nursing some and receiving home health services What are the most essential data elements to ensuring safe, effective care transitions and ongoing care management? How might sharing key data elements actually improve the communication? Consider health concerns, patient goals, expected outcomes, interventions, including advance orders,
			• An up-to-date interdisciplinary problem list inclusive of versioning in support of collaborative care (formerly 127) Measure: The EP, eligible hospital, or CAH that transitions or refers their patient to another site of care or provider of care provides the electronic care plan information for 10% of transitions of care to receiving provider and patient/caregiver. Certification Criteria: Develop standards for a shared care plan, as being defined by S&I Longitudinal Coordination of Care WG. Some of the data elements in the shared care plan overlap content represented in the CDA. Adopt standards for the structured recording of other data elements, such as patient goals and related interventions.	expected outcomes, interventions, including advance orders, and care team members. What data strategy and terminology are required such that the data populated by venue specific EHRs can be exchanged. How might existing terminologies be reconciled? What are the requirements (legal, workflow, other considerations) for patients and their identified team to participate in a shared care plan? Is it useful to consider role-based access as a technical method of implementing who will have access to and be able to contribute to the care plan? How will such access be managed?

Interdisciplinary Prob list – 127 Consolidated

ID#	Stage 2 Final Rule	Stage 3 Recommenda tions	Proposed for Future Stage	Questions / Comments
	New	New	Ability to maintain an up-to-	
127			date interdisciplinary problem	
			list inclusive of versioning in	
			support of collaborative care	

Notifications – 308

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
New	MENU EH Objective: The EH/CAH will send electronic notification of a significant healthcare event in a timely manner to key members of the patient's care team, such as the primary care provider, referring provider or care coordinator, with the patient's consent if required. Significant events include: •Arrival at an Emergency Department (ED) •Admission to a hospital •Discharge from an ED or hospital •Death EH Measure: For 25 patients with a significant healthcare		
	event (arrival at an Emergency Department (ED), admission to a hospital, discharge from an ED or hospital, or death), EH/CAH will send an electronic notification to at least one key member of the patient's care team, such as the primary care provider, referring provider or care coordinator, with the patient's consent if required, within 24 hours of when the event occurs. Certification Criteria: Ability to send/receive notification of a significant healthcare event		

Future Stage

Med Adherence, PDMP - 125

ID #	Stage 2	Stage 3	Proposed for Future Stage	Questions / Comments
125	New	New	Medication reconciliation: create ability to accept data feed from PBM (Retrieve external medication fill history for medication adherence monitoring)	
			Vendors need an approach for identifying important signals such as: identify data that patient is not taking a drug, patient is taking two kinds of the same drug (including detection of abuse) or multiple drugs that overlap.	
			Certification criteria: EHR technology supports streamlined access to prescription drug monitoring programs (PDMP) data. For example: Via a hyperlink or single sign-on for accessing the PDMP data Via automated integration into the patient's medication history Leveraging things like single sign on or functionality that could enable the linkage between PDMPs and prescribers and EDs?	

Subgroup 4 – Population and Public Health

Art Davidson, Subgroup Lead George Hripcsak, MU WG Co-Chair

Subgroup 4

- Immunization registries 401A
- Electronic lab reporting 402A (no change)
- Case reports to public health 402B (certification only)
- Syndromic surveillance 403
- Registries 404/405/407 (merged)
- Adverse event reports 408 (future stage)
- Immunization CDS 401B (consolidated with CDS)

Immunization Registry – 401A

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage
EP/EH Objective:	EP/ EH Objective: Capability to receive a patient's immunization history	EP/EH Objective:
Capability to submit	supplied by an immunization registry or immunization information system,	Add submission of
electronic data to	and to enable healthcare professionals to use structured historical	vaccine
immunization registries	immunization events in the clinical workflow, except where prohibited, and	contraindication(s)
or immunization	in accordance with applicable law and practice.	and reason(s) for
information systems		substance refusal
except where prohibited,	Measure: Documentation of timely and successful electronic receipt by the	to the current
and in accordance with	Certified EHR Technology of vaccine history (including null results) from an	objective of
applicable law and	immunization registry or immunization information system for 30–10% of	successful ongoing
practice	patients who received immunizations from the EP/EH during the entire EHR	immunization data
	reporting period. at least 10 query results received by the EHR from the	submission to
EP/EH Measure:	immunization registry or immunization information system within the	registry or
Successful ongoing	reporting period.	immunization
submission of electronic		information
immunization data from	Exclusion: EPs and EHs that administer no immunizations or jurisdictions	systems.
Certified EHR Technology	where immunization registries/immunization information systems cannot	
to an immunization	provide electronic immunization histories.	
registry or immunization		
information system for	Certification criteria #1 : EHR is able to receive and present a standard set of	
the entire EHR reporting	structured, externally-generated, immunization history and capture the act	
period	and date of review within the EP/EH practice.	
	Certification criteria #2: Ability to generate a report that the functionality was enabled for the entire reporting period.	

Electronic reportable lab results - 402A

No Change

Stage 2 Final Rule	Stage 3 Recommendations
EH Objective: Capability to submit electronic	EH Objective (unchanged): No change from current
reportable laboratory results to public health	requirement for electronic lab reporting which
agencies, except where prohibited, and in	generally is sent from the laboratory information
accordance with applicable law and practice	system
Measure: Successful ongoing submission of	
electronic reportable laboratory results from	
Certified EHR Technology to public health agencies	
for the entire EHR reporting period.	

Certification ONLY

Case reports – 402B

Stage 2	Stage 3	Proposed for Future Stage	Questions / Comments
New	New	EP Objective: Capability to use externally accessed or received	
		knowledge (e.g. reporting criteria) to determine when a case	
		report should be reported and then submit the initial report to a	
		public health agency, except where prohibited, and in accordance	
		with applicable law and practice.	
		Measure: Attestation of submission of standardized initial case reports to public health agencies on 10% of all reportable disease or conditions during the entire EHR reporting period as authorized, and in accordance with applicable state/local law and	
		practice.	
		Certification criteria: The EHR uses external data to prompt the end-user when criteria are met for case reporting. The date and time of prompt is available for audit. Standardized (e.g., consolidated CDA) case reports are submitted to the state/local	
		jurisdiction and the data/time of submission is available for audit.	

Syndromic Surveillance – 403 No Change

Stage 2 Final Rule	Stage 3 Recommendations
EP MENU Objective: Capability to submit electronic syndromic surveillance	No change from current
data to public health agencies, except where prohibited, and in accordance with applicable law and practice	requirements.
EH Objective: Capability to submit electronic syndromic surveillance data to public health agencies, except where prohibited, and in accordance with applicable law and practice	
EP/EH Measure: Successful ongoing submission of electronic syndromic surveillance data from Certified EHR Technology to a public health agency for the entire EHR reporting period	

Proposed Merged Registry Objective (404, 405, 407- EP)

EP Objective:

Capability to electronically submit standardized (i.e., data elements, structure and transport mechanisms), commonly formatted reports to two registries (e.g., local/state health departments, professional or other aggregating resources) from the Certified EHR Technology, except where prohibited, and in accordance with applicable law and practice. This objective is in addition to and does not replace prior requirements for submission to an immunization registry.

Measure: Documentation (or registry acknowledgement) of ongoing successful electronic transmission of Standardized reports from the CEHRT to two registries (either mandated or voluntary)). **Attestation of submission for at least 10% of all patients** who meet registry inclusion criteria during the entire EHR reporting period as authorized, and in accordance with applicable State law and practice.

Registries examples include: cancer, children with special needs, and/or early hearing detection and intervention or external entities that maintain the registry (e.g., hypertension, diabetes, body mass index, devices, and/or other diagnoses/conditions) that could include accountable care organization, public health agency, professional society, or specialty community.

Certification criteria: EHR is able to build and then send a standardized report (e.g., standard message format) to a registry, maintain an audit of those reports, and track total number of reports sent.

Exclusion: where local or state health departments have no mandated registries or are incapable of receiving these standardized reports. Merged registry objectives.

Proposed Merged Registry Objective (404, 405, 407 - EH objective)

EH Objective: Capability to electronically submit standardized (i.e., data elements, structure and transport mechanisms), commonly formatted reports to two registries (e.g., local/state health departments, professional or other aggregating resources) from the Certified EHR Technology, except where prohibited, and in accordance with applicable law and practice. This objective is in addition to and does not replace prior requirements for submission to an immunization registry.

Measure: Documentation (or registry acknowledgement) of ongoing successful electronic transmission of standardized reports from the CEHRT to two registries (either mandated or voluntary)). **Attestation of submission for at least 10%** of all patients who meet registry inclusion criteria during the entire EHR reporting period as authorized, and in accordance with applicable State law and practice.

Registries include: cancer, health-care associated infections, children with special needs, and/or early hearing detection and intervention or external entities that maintain the registry (e.g., hypertension, diabetes, body mass index, devices, and/or other diagnoses/conditions) that could include accountable care organization, public health agency, professional society, or specialty community) should maintain the registry

Certification criteria: EHR is able to build and then send a standardized report (e.g., standard message format) to an external mandated or voluntary registry, maintain an audit of those reports, and track total number of reports sent.

Exclusion: where local or state health departments have no mandated registries or are incapable of receiving these standardized reports. Merged registry objectives.

Mandated Registry – 404

Consolidated

Stage 2 Final Rule	Stage 3 Recommendations
EP only MENU Objective:	EH/EP Objective: Capability to electronically participate and send
Capability to identify and report	standardized (i.e. data elements and transport mechanisms), commonly
cancer cases to a public health	formatted reports to a mandated jurisdictional registry (e.g., cancer,
central cancer registry, except	children with special needs, and/or early hearing detection and
where prohibited, and in	intervention) from Certified EHR to either local/state health departments,
accordance with applicable law	except where prohibited, and in accordance with applicable law and
and practice.	practice. This objective is in addition to prior requirements for submission
	to an immunization registry.
EP only MENU Measure:	Measure: Documentation of ongoing successful electronic transmission of
Successful ongoing submission	standardized reports from the Certified EHR Technology to the
of cancer case information from	jurisdictional registry. Attestation of submission for at least 10% of all
CEHRT to a public health central	patients who meet registry inclusion criteria during the entire EHR
cancer registry for the entire	reporting period as authorized, and in accordance with applicable State
EHR reporting period	law and practice.
	Certification criteria: EHR is able to build and then send a standardized
	report (e.g., standard message format) to an external mandated registry,
	maintain an audit of those reports, and track total number of reports sent.
	Exclusion: where local or state health departments have no mandated
	registries or are incapable of receiving these standardized reports

Additional Registry – 405

Consolidated

Stage 2 Final Rule	Stage 3 Recommendations
EP only MENU Objective: Capability to	EP Objective: Capability to electronically submit standardized
identify and report specific cases to a	reports to an additional registry beyond any prior meaningful use
specialized registry (other than a cancer	requirements (e.g., immunizations, cancer, early hearing detection
registry), except where prohibited, and	and intervention, and/or children with special needs). Registry
in accordance with applicable law and	examples include hypertension, diabetes, body mass index, devices,
practice.	and/or other diagnoses/conditions) from the Certified EHR to a
	jurisdictional, professional or other aggregating resources (e.g., HIE,
EP only MENU Measure: Successful	ACO), except where prohibited, and in accordance with applicable
ongoing submission of specific case	law and practice.
information from Certified EHR	
Technology to a specialized registry for	Measure: Documentation of successful ongoing electronic
the entire EHR reporting period	transmission of standardized (e.g., consolidated CDA) reports from
	the Certified EHR Technology to a jurisdictional, professional or
	other aggregating resource. Attestation of submission for at least
	10% of all patients who meet registry inclusion criteria during the
	entire EHR reporting period as authorized, and in accordance with
	applicable state/local law and practice.
	Certification criteria: EHR is able to build and send a standardized
	message report format to an external registry, maintain an audit of
	those reports, and track total number of reports sent.

HAI reports – 407

Consolidated

Stage 2 Final Rule	Stage 3 Recommendations
New	EH Objective: Capability to electronically send standardized
	Healthcare Associated Infection (HAI) reports to the National
	Healthcare Safety Network (NHSN) using a common format from
	the Certified EHR, except where prohibited, and in accordance
	with applicable law and practice.
	Measure: Documentation of successful electronic transmission of
	standardized healthcare acquired infection reports to the NHSN
	from the Certified EHR Technology. Total numeric count of HAI in
	the hospital and attestation of Certified EHR electronic submission
	of at least 10% of all reports during the entire EHR reporting
	period as authorized, and in accordance with applicable State law
	and practice.
	Certification criteria: EHR is able to sending a standard HAI
	message to NHSN, maintain an audit and track total number of
	reports sent.

Adverse Event Reports – 408

Future Stage

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage
New	New	EH/EP Objective: Capability to electronically send adverse event
		reports (e.g., vaccines, devices, EHR, drugs or biologics) to the
		Federal Drug Administration (FDA) and/or Centers for Disease
		Control and Prevention (CDC) from the Certified EHR, except
		where prohibited, and in accordance with applicable law and
		practice.
		Measure: Attestation of successful electronic transmission of
		standardized adverse event reports to the FDA/CDC from the
		Certified EHR Technology. Total numeric count (null is acceptable)
		of adverse event reports from the EH/EP submitted electronically
		during the entire EHR reporting period as authorized, and in
		accordance with applicable State law and practice.
		Certification criteria: EHR is able to build and send a standardized
		adverse event report message to FDA/CDC and maintain an audit
		of those reports sent to track number of reports sent (Common
		Format).

Immunization CDS – 401B Consolidated

Stage 2 Final Rule	Stage 3 Recommendations	Proposed for Future Stage	Questions / Comments
New	EP/EH Objective: Capability to receive, generate or access appropriate age-, gender- and immunization history-based		
	recommendations (including immunization events from		
	immunization registries or immunization information		
	systems) as applicable by local or state policy.		
	Measure: Implement an immunization recommendation		
	system that: 1) establishes baseline recommendations (e.g., Advisory Committee on Immunization Practices), and		
	2) allows for local/state variations. For 20% of patients		
	receiving an immunization, the EP/EH practice receives the		
	recommendation before giving an immunization.		
	Exclusion: EPs and EHs that administer no immunizations.		
	Certification criteria: EHR uses a standard (e.g., national,		
	state and/or local) rule set, plus patient age, gender, and		
	prior immunization history to recommend administration		
	of immunizations; capture the act and date/time of		
	recommendation review.		

Deeming Option An Alternate Pathway

Deeming Assumptions

- Providers have already met all functional objectives in stages 1 and 2
- Effective use of HIT can reliably can assist in the achievement of good performance (or significant improvement)
- To promote innovation, reduce burden, and reward good performance, deem high performers (or significant improvers) in satisfaction of a subset of MU objectives as an optional pathway to qualifying for MU
- CMS selects appropriate outcomes-oriented CQMs as deeming performance measure; CMS may have to contract for appropriate measures to be developed

Example Framework (not QMs) for Deeming for EPs

Demonstrate high (top quartile) or improved performance (20% reduction of gap between last year's performance and top quartile) and reduction in disparities. Select two items from each of the categories below:

Prevention of high priority diseases

(pick 2 from) [could be a dynamic set vs static]

- Colon cancer (colonoscopy screening – NQF 0034)
- Influenza (flu vaccine NQF 0041)
- Pneumonia (pneumococcal vaccine NQF 0043)
- Obesity (BMI screening and follow up – NQF 0421)
- Cardiovascular disease (LDL screen – NQF 0075)
- HTN (BP screen and follow up)

Control of high priority chronic health conditions (pick 2 from) could be a dynamic set vs static]

- HTN (BP control or improvement)
- Diabetes (A1c control)
- Heart attack (LDL control)
- Asthma (controller med)
- CHF (ACEI or ARB meds)
- MI (beta blocker)

For <u>one</u> of the four selected population reports, demonstrate improvement from the prior year for a disparity population (e.g., language, gender, race, ethnicity, LGBT, SES)

 Improvement is reduction of the gap between the mean performance for the disparity subset and the mean performance for the rest of the patient population

Example Framework (not QMs) for Deeming for EHs

Demonstrate high (top quartile) or improved performance (20% reduction of gap between last year's performance and top quartile) and reduction in disparities. Select two items from each of the categories below:

Patient safety (pick 2 from)

- Clostridium difficile Infection (outcome measure)
- Catheter-Associated Urinary Tract Infection (outcome measure)
- Central Line-Associated Blood Stream Infection (outcome measure)
- MRSA (staph outcome measure)
- Specific Surgical Site Infection (SSI) Outcome Measure
- Severe sepsis and septic shock: Management bundle
- Late sepsis or meningitis in very low birth weight (VLBW) neonates (risk-adjusted)
- Measure of pressure ulcers

Care coordination (pick 2 from)

- Experience of care (from HCAHPS)
- Hospital-wide-all-cause unplanned readmission measure (HWR)
- CTM-3, 3-item care transition

For <u>one</u> of the four selected population reports, demonstrate improvement from the prior year for a disparity population (e.g., language, gender, race, ethnicity, LGBT, SES)

 Improvement is reduction of the gap between the mean performance for the disparity subset and the mean performance for the rest of the patient population

Deemed MU Objectives

Deemed in Satisfaction of:

- CDS
- Reminders
- Electronic notes
- Test tracking
- Clinical summary
- Patient education
- Reconcile meds
- *View, download, transmit (VDT), consider adding if stage 2 reports good uptake
- *Secure patient messaging, consider adding if stage 2 reports good uptake

Remaining Items:

- Advance directive
- eMAR
- Imaging results
- EH: provide lab results
- Patient generated data
- *VDT
- *Secure patient messaging
- Care summary
- Notification of health event
- Immunization registry
- Electronic lab reporting
- Syndromic surveillance
- Reporting to registries

NB: There is not a 1:1 mapping of QMs used for deeming and the MU functional objectives being deemed in compliance

Additional Considerations

- Propose baseline reporting period to be the 12 months prior to the performance reporting period
 - Providers anticipating that they will participate in the deeming pathway are advised that the deeming program uses the prior year's performance as the baseline for determining "improvement performance"
- Specialists may have fewer options for deeming as determined by available NQF QMs. If not able to report on at least 4 performance measures, then may not be eligible for the deeming pathway
- Since effective use of HIT is an enabler for many of the performance improvement programs at CMS, we recommend that qualification for MU in a given year should be deemed partial satisfaction of other CMS programs (e.g., ACO, PCMH, eRx, CPCI, PQRS)

Next Steps

- MU WG will incorporate HITPC feedback into revised recommendations to be presented for HITPC approval September 4
- MU WG to discuss and develop recommendations about timing of stage 3 to present September 4
- QM/ACO TT to discuss QMs appropriate for use in 'ACO' models of care and other outcome-oriented measures useful for deeming program, to present in October HITPC

Summary Stage 3 Recommendations

- Continues the trajectory for meaningful use of effective HIT
- Leverages work and functionality of stages 1 and 2
- Focuses more on tools needed to measure and improve outcomes
- Reduces and simplifies functional objectives
- Provides alternative deeming pathway for high performers and high improvers, meeting the primary MU objective of improving health outcomes