



Overview of the Changes Promoting Interoperability Requirements for 2019

The purpose of this document is to compare the Promoting Interoperability (PI) objectives and measures for hospitals vs. Medicare clinicians under the Merit-based Incentive Program (MIPS) vs. Medicaid requirements. Under the Medicare hospital Promoting Interoperability (PI) Program and the MIPS PI performance category requirements, there is better alignment and new opioid measures are optional. Some measures have also been removed. Medicaid measures largely retain the previous Stage 3 construct however, CMS has made some changes.

KEY CHANGES:

Hospitals:

- Final IPPS rule [here](#).
- 2019 Medicare measure specification sheets [here](#).
- Under the public health measures hospitals now only must select any two measures rather than having to meet syndromic reporting plus one additional registry measure.
- New opioid measures are finalized as proposed, except the Verifying the Opioid Treatment Plan measure is now optional for both 2019 and 2020.
- Modified Stage 2 requirements for EHs in 2018 (included for comparison purposes only)

MIPS Clinicians:

- Final QPP rule [here](#).
- New opioid measures have been finalized.
- In 2018 clinicians could pick any two public health measures and earn 10 points for the first and 5 points for the second. For 2019 if a clinician reports on two measures they earn 10 points.
- Go [here](#) for a detailed summary of the objectives and measures for 2019.
- 2019 specification sheets are [here](#).

Medicaid

- For 2019, CMS made changes to Objective 6, Coordination of Care – Measures 1 (View, Download, Transmit) and 2 (Secure Messaging) for EPs; both remain at a threshold of 5%. Under Objective 8, Public Health Reporting, for Measure 2 (Syndromic Surveillance), CMS removed restrictions around urgency care settings; also, CMS did not change any requirements for registries that they had to accept data from EPs. If an EP meets the requirements of a registry, they can use it; if not, they can take the exclusion.
- 2019 specification sheets for 2019 for hospitals [here](#) and for clinicians [here](#).



2018 Medicare		2018 Medicaid		2019 Medicare		2019 Medicaid	
2018 ¹ Medicare Hospitals (Mod 2)	2018 MIPS EC	2018 Medicaid Hospitals DONE	2018 Medicaid EPs	2019 Medicare Hospital	2019 MIPS EP	2019 Medicaid Hospitals	2019 Medicaid EPs
Objective: Protect Patient Health Info Measure: Security Risk Analysis Base for MIPS ECs.		Objective: Protect Patient Info Measure: Security Risk Analysis		Objective: Protect Patient Info Measure: Security Risk Analysis (0 points but must meet)		Objective: Protect Patient Health Info Measure: Security Risk Analysis	
		Objective: CDS Measures: 1. Use 5 CDS related to 4 CQMs 2. Drug/drug & drug/allergy checks enabled				Objective: CDS Measures: 1. Use 5 CDS related to 4 CQMs 2. Drug/drug & drug/allergy checks enabled	
		Objective: CPOE Measures: CPOE for: 1. Meds: 60% 2. Labs: 30% 3. Imaging: 30%				Objective: CPOE Measures: CPOE for: 1. Meds: 60% 2. Labs: 60% 3. Imaging: 60%	
Objective: eRx Measure: Prescribing: EH:10% EC: Required / Base		Objective: Electronic Prescribing Measure: e-prescribing: EH: 10% EP: 50%		Objective: e-Prescribing Measures: 1. e-Prescribing (10 points) 2. Query of Prescription Drug Monitoring Program (PDMP) [NEW] (optional 5 bonus points) 3. Verify Opioid Treatment Agreement [NEW] optional (5 bonus point)		Objective: Electronic Prescribing Measure: EH: 25% EP: 60%	
Objective: Patient Specific Education Measure: Patient education via CEHRT EH: 10% EC: Not required / Performance Up to 10%		Objective: Patient specific education Measure: Patient education via CEHRT: 10%		Objective: Provider to Patient Exchange Measure: Provide Patients Electronic Access to Their Health Information (40 points)		Objective: Patient electronic access Measures: 1. Give VD&T and API access: 80% 2. Use CEHR to give education resources to patients: 35%	

¹ For the purposes of this fact sheet, for 2018 this refers to Modified Stage 2 requirements. e



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Objective: Patient Electronic Access Measures: EH: 1. Provide access within 36 hours of discharge: 50% 2. View, download, transmit: at least one patient EC: 1. Provide Patient Access – Required / Base. Up to 20% points 2. VDorT – Not required / Performance. Up to 10% points		Objective: Patient electronic access Measures: 1. Give VD&T access: 50% 2. Patients VDorT info to 3 rd party: 5%				Objective: Coordination of Care Measures: (Attest to all 3; meet 2) 1. VDorT and API: EP: 5% EH: 10% 2. Secure messaging: EP: 5% EH: 25% 3. PGD: 5% for both EH and EP 4. 25%	
Objective: Health Information Exchange (HIE) Measures: EH: Use CEHRT to create & send Summary of Care (SoC): 10% EC: Up to 20% points. Base / Required 1. Send a Summary of Care (SoC) using CHERT 2. Send SoC: For at least one patient		Objective: HIE Measures: Use CEHRT to create SoC & send SoC: 10%		Objective: HIE Measures: 1. Support Electronic Referral Loops by Sending Health Information (20 points) 2. Support Electronic Referral Loops by Receiving and Incorporating Health Information (20 points)		Objective: HIE Measures: 1. Use CEHRT to create & send SoC: 50% 2. Incorporate SoC into EHR for transitions / referrals: 40% 3. Clinical info reconciliation for referrals / transitions: 80%	
		Objective: Secure Messaging Measure: Send secure message - Performance / not required. Up to 10% points		Objective: Secure messaging Measure: EH: Send to patients: 5% EP: Not required		See Coordination of Care	



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Objective: Medication reconciliation Measure: Medication Reconciliation for ToC: 50%	Objective: Clinical information reconciliation Measure: Clinical info reconciliation – Performance / not required. Up to 10% points	Objective: Medication reconciliation Measure: For ToC: 50%				See HIE	
Objective: Public Health and Clinical Data Exchange Measures: EH: Report to 3: 1. Immunization 2. Syndromic 3. Specialized Registry 4. Electronic Lab EC: Report on public health measure: Up to 10% points. Performance / not required 1. Immunization 2. Syndromic 3. Specialized Bonus points: 1. Report an extra one for 5% bonus points; 2. Report improvement-activities using CEHRT (10%); 3. Report using 2015 Edition CEHRT (10%)	Objective: Public Health Reporting Measures: EH: Meet 3 of 4 below 1. Immunization 2. Syndromic 3. Specialized 4. Laboratory EP: Meet 2 of 3 below. 1. Immunization 2. Syndromic 3. Specialized registry		Objective: Public Health and Clinical Data Exchange Measures: Pick any 2. 1. Syndromic 2. Immunization 3. Electronic Case Reporting 4. Public Health 5. Clinical Data 6. Laboratory (EH only)		Objective: Public Health and Clinical Data Exchange Measures: EP: Pick any 2: EH: Pick any 4: 1. Syndromic 2. Immunization 3. Electronic Case Reporting 4. Public Health 5. Clinical Data 6. Laboratory (EH only)		