

2021 Medicare Promoting Interoperability Program Requirements

*Overview for Eligible Hospitals and
Critical Access Hospitals*

January 12, 2021



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Topics

- Overview of the Medicare Promoting Interoperability Program
- CY 2021 Requirements for Medicare Promoting Interoperability Program
 - Electronic Health Record (EHR) Reporting Requirements
 - Certified EHR Technology (CEHRT) Requirements
 - Objectives, Measures, and Scoring
 - Electronic Clinical Quality Measure (eCQM) Changes
- Additional Resources

Medicare Promoting Interoperability Program Overview

- In the *Fiscal Year 2021 Medicare Hospital Inpatient Prospective Payment System for Acute Care Hospitals and the Long-term Care Hospital Prospective Payment System Final Rule*, CMS finalized changes and requirements for the Medicare Promoting Interoperability Program for eligible hospitals, critical access hospitals (CAHs), and dual-eligible hospitals attesting to CMS
- These changes focus on:
 - Advancing utilization of CEHRT
 - Reducing physician burden
 - Advancing interoperability
 - Improving patient access to health information

Program Requirements

Changes for 2021



Maintaining the Electronic Prescribing objective's Query of Prescription Drug Monitoring Program (PDMP) measure as **optional** and worth 5 bonus points



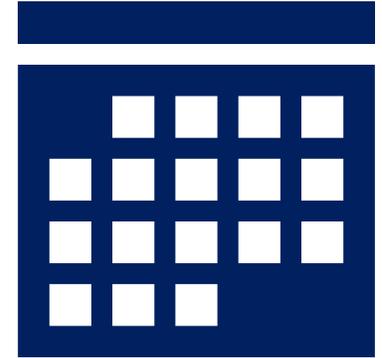
Modifying the name of the *Support Electronic Referral Loops by Receiving and Incorporating Health Information* to the *Support Electronic Referral Loops by Receiving and Reconciling Health Information* measure to better reflect the actions required by hospitals



Increased the number of quarters of eCQM data reported from one self-selected quarter to two self-selected quarters of data

EHR Reporting Period in 2021

- Minimum of any continuous 90-day period for new and returning participants
- Eligible hospitals and CAHs must successfully attest to avoid a downward Medicare payment adjustment



CEHRT Requirements

CEHRT Requirements

- Utilize 2015 Edition CEHRT
- The functionality must be in place by the first day of the EHR reporting period and the product must be certified to the 2015 Edition criteria by the last day of the EHR reporting period
- The eligible hospital or CAH must be using the 2015 Edition functionality for the full EHR reporting period

Objectives & Measures

Electronic Prescribing Objective Overview

Electronic Prescribing Objective and Measures



e-Prescribing

- 10 points
- Numerator/Denominator reporting
- Exclusion available

Query of PDMP

- Optional
- 5 bonus points
- Yes/No attestation
- No exclusion available

e-Prescribing Measure

Measure Name:	e-Prescribing
Measure Description	For at least one hospital discharge medication orders for permissible prescriptions (for new and changed prescriptions) are queried for a drug formulary and transmitted electronically using CEHRT
Maximum Points Available	10 points
Numerator	The number of prescriptions in the denominator generated, queried for a drug formulary, and transmitted electronically.
Denominator	The number of new or changed prescriptions written for drugs requiring a prescription in order to be dispensed other than controlled substances for patients discharged during the EHR reporting period.
Exclusion Available?	Yes Any eligible hospital or CAH that does not have an internal pharmacy that can accept electronic prescriptions and there are no pharmacies that accept electronic prescriptions within 10 miles at the start of their EHR reporting period
If exclusion claimed, points re-distribution	10 points would be redistributed equally among the measures under the Health Information Exchange objective

Query of PDMP Measure

Measure Name:	Query of Prescription Drug Monitoring Program (PDMP)
Measure Description	For at least one Schedule II opioid electronically prescribed using CEHRT during the EHR reporting period, the eligible hospital or CAH uses data from CEHRT to conduct a query of a PDMP for prescription drug history is conducted, except where prohibited and in accordance with applicable law
Maximum Points Available	5 points (<i>bonus</i>)
Yes/No Attestation	The eligible hospital or CAH must attest YES to conducting a query of PDMP for prescription drug history.
Exclusion Available?	No

Health Information Exchange Objective Overview

Health Information Exchange Objective and Measures



Support Electronic Referral Loops by Sending Health Information

- Up to 20 points
- Numerator/Denominator reporting
- No exclusion available

Support Electronic Referral Loops by Receiving and Reconciling Health Information

- Up to 20 points
- Numerator/Denominator reporting
- No exclusion available

Support Electronic Referral Loops by Sending Health Information Measure

Measure Name:	Support Electronic Referral Loops by Sending Health Information
Measure Description	For at least one transition of care or referral, the eligible hospital or CAH that transitions or refers their patient to another setting of care or provider of care: (1) Creates a summary of care record using CEHRT; and (2) electronically exchanges the summary of care record.
Maximum Points Available	20 points
Numerator	The number of transitions of care and referrals in the denominator where a summary of care record was created and exchanged electronically using CEHRT.
Denominator	Number of transitions of care and referrals during the EHR reporting period for which the eligible hospital or CAH inpatient or emergency department (POS 21 or 23) was the transitioning or referring provider to a provider of care other than an eligible hospital or CAH.
Exclusion Available?	No

Support Electronic Referral Loops by Receiving and Reconciling Health Information Measure

Measure Name:	Support Electronic Referral Loops by Receiving and Reconciling Health Information
Measure Description	For at least one electronic summary of care record received for patient encounters during the EHR reporting period for which an eligible hospital or CAH was the receiving party of a transition of care or referral, or for patient encounters during the EHR reporting period in which the eligible hospital or CAH has never before encountered the patient, the eligible hospital or CAH conducts clinical information reconciliation for medication, medication allergy, and current problem list
Maximum Points Available	20 points
Numerator	The number of electronic summary of care records in the denominator for which clinical information reconciliation is completed using CEHRT for the following three clinical information sets: (1) Medication – Review of the patient's medication, including the name, dosage, frequency, and route of each medication; (2) Medication allergy – Review of the patient's known medication allergies; and (3) Current Problem List – Review of the patient's current and active diagnoses.
Denominator	The number of electronic summary of care records received using CEHRT for patient encounters during the EHR reporting period for which an eligible hospital or CAH was the receiving party of a transition of care or referral, and for patient encounters during the EHR reporting period in which the eligible hospital or CAH has never before encountered the patient.
Exclusion Available?	No

Provider to Patient Exchange Objective Overview

Provider to Patient Exchange Objective and Measure



Provide Patients Electronic Access to Their Health Information

- Up to 40 points
- Numerator/ Denominator reporting
- No exclusion available

Provide Patients Electronic Access to Their Health Information Measure

Measure Name:	Provide Patients Electronic Access to Their Health Information
Measure Description	For at least one unique patient discharged from the eligible hospital or CAH inpatient or emergency department (POS 21 or 23) the patient (or patient-authorized representative) is provided timely access to view online, download, and transmit his or her health information; and the eligible hospital or CAH ensures the patient's health information is available for the patient (or patient-authorized representative) to access using any application of their choice that is configured to meet the technical specifications of the application programming interfaces (API) in the eligible hospital or CAH's CEHRT.
Maximum Points Available	40 points
Numerator	The number of patients in the denominator (or patient authorized representative) who are provided timely access to health information to view online, download and transmit to a third party and to access using an application of their choice that is configured to meet the technical specifications of the API in the provider's CEHRT.
Denominator	The number of unique patients discharged from an eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23) during the EHR reporting period.
Exclusion Available?	No

Public Health and Clinical Data Exchange

Objective Overview

Public Health and Clinical Data Exchange Objective and Measures



- Up to 10 points
- Yes/No attestation on any 2 of 6 measures available
- Exclusions available

Public Health and Clinical Data Exchange Measures

Report on **two (2)**
of the **six (6)**
measures



Syndromic Surveillance
Reporting

Public Health Registry
Reporting

Immunization Registry
Reporting

Clinical Data Registry
Reporting

Electronic Case Reporting

Electronic Reportable
Laboratory Result Reporting

Syndromic Surveillance Reporting Measure

Measure Name:	Syndromic Surveillance Reporting
Measure Description	The eligible hospital or CAH is in active engagement with a public health agency (PHA) to submit syndromic surveillance data from an urgent care setting.
Maximum Points Available	10 points
Yes/No Attestation	Yes/No Attest to two measures under the Public Health and Clinical Data Exchange objective
Exclusion Available?	Yes <ul style="list-style-type: none"> • Does not have an emergency or urgent care department; • Operates in a jurisdiction for which no PHA is capable of receiving electronic syndromic surveillance data from eligible hospitals or CAHs in the specific standards required to meet the certified electronic health record technology (CEHRT) definition at the start of the electronic health record (EHR) reporting period; or • Operates in a jurisdiction where no PHA has declared readiness to receive syndromic surveillance data from eligible hospitals or CAHs as of six months prior to the start of the EHR reporting period.
If exclusion claimed, points re-distribution	<ul style="list-style-type: none"> • If one exclusion is claimed, but one measure is attested to, the 10 points will be granted for the Public Health and Clinical Data Exchange objective. • If two exclusions are claimed, then the 10 points will be redistributed to the Provide Patients Electronic Access to their Health Information measure.

Immunization Registry Reporting Measure

Measure Name:	Syndromic Surveillance Reporting
Measure Description	The eligible hospital or CAH is in active engagement with a public health agency (PHA) to submit syndromic surveillance data from an urgent care setting.
Maximum Points Available	10 points
Yes/No Attestation	Yes/No Attest to two measures under the Public Health and Clinical Data Exchange objective
Exclusion Available?	Yes <ul style="list-style-type: none"> • Does not have an emergency or urgent care department; • Operates in a jurisdiction for which no PHA is capable of receiving electronic syndromic surveillance data from eligible hospitals or CAHs in the specific standards required to meet the certified electronic health record technology (CEHRT) definition at the start of the electronic health record (EHR) reporting period; or • Operates in a jurisdiction where no PHA has declared readiness to receive syndromic surveillance data from eligible hospitals or CAHs as of six months prior to the start of the EHR reporting period.
If exclusion claimed, points re-distribution	<ul style="list-style-type: none"> • If one exclusion is claimed, but one measure is attested to, the 10 points will be granted for the Public Health and Clinical Data Exchange objective. • If two exclusions are claimed, then the 10 points will be redistributed to the Provide Patients Electronic Access to their Health Information measure.

Electronic Case Reporting Measure

Measure Name:	Electronic Case Reporting
Measure Description	The eligible hospital or CAH is in active engagement with a PHA to submit case reporting of reportable conditions.
Maximum Points Available	10 points
Yes/No Attestation	Yes/No Attest to two measures under the Public Health and Clinical Data Exchange objective
Exclusion Available?	Yes Any eligible hospital or CAH meeting one or more of the following criteria may be excluded from the case reporting measure if the eligible hospital or CAH: <ul style="list-style-type: none"> • Does not treat or diagnose any reportable diseases for which data is collected by their jurisdiction’s reportable disease system during the electronic health record (EHR) reporting period; • Operates in a jurisdiction for which no PHA is capable of receiving electronic case reporting data in the specific standards required to meet the certified electronic health record technology (CEHRT) definition at the start of the EHR reporting period; or • Operates in a jurisdiction where no PHA has declared readiness to receive electronic case reporting data as of six months prior to the start of the EHR reporting period.
If exclusion claimed, points re-distribution	<ul style="list-style-type: none"> • If one exclusion is claimed, but one measure is attested to, the 10 points will be granted for the Public Health and Clinical Data Exchange objective. • If two exclusions are claimed, then the 10 points will be redistributed to the Provide Patients Electronic Access to their Health Information measure.

Public Health Registry Reporting Measure

Measure Name:	Public Health Registry Reporting
Measure Description	The eligible hospital or CAH is in active engagement with a PHA to submit data to public health registries.
Maximum Points Available	10 points
Yes/No Attestation	Yes/No Attest to two measures under the Public Health and Clinical Data Exchange objective
Exclusion Available?	Yes Any eligible hospital or CAH meeting at least one of the following criteria may be excluded from the public health registry reporting measure if the eligible hospital or CAH: <ul style="list-style-type: none"> • Does not diagnose or directly treat any disease or condition associated with a public health registry in their jurisdiction during the electronic health record (EHR) reporting period; • Operates in a jurisdiction for which no PHA is capable of accepting electronic registry transactions in the specific standards required to meet the certified electronic health record technology (CEHRT) definition at the start of the EHR reporting period; or • Operates in a jurisdiction where no public health registry for which the eligible hospital or CAH is eligible has declared readiness to receive electronic registry transactions as of six months prior to the start of the EHR reporting period.
If exclusion claimed, points re-distribution	<ul style="list-style-type: none"> • If one exclusion is claimed, but one measure is attested to, the 10 points will be granted for the Public Health and Clinical Data Exchange objective. • If two exclusions are claimed, then the 10 points will be redistributed to the Provide Patients Electronic Access to their Health Information measure.

Clinical Data Registry Reporting Measure

Measure Name:	Clinical Data Registry Reporting
Measure Description	The eligible hospital or CAH is in active engagement to submit data to a clinical data registry (CDR).
Maximum Points Available	10 points
Yes/No Attestation	Yes/No Attest to two measures under the Public Health and Clinical Data Exchange objective
Exclusion Available?	Yes Any eligible hospital or CAH meeting at least one of the following criteria may be excluded from the CDR reporting measure if the eligible hospital or CAH: <ul style="list-style-type: none"> • Does not diagnose or directly treat any disease or condition associated with a CDR in their jurisdiction during the electronic health record (EHR) reporting period; • Operates in a jurisdiction for which no CDR is capable of accepting electronic registry transactions in the specific standards required to meet the certified electronic health record technology (CEHRT) definition at the start of the EHR reporting period; or • Operates in a jurisdiction where no CDR for which the eligible hospital or CAH is eligible has declared readiness to receive electronic registry transactions as of six months prior to the start of the EHR reporting period.
If exclusion claimed, points re-distribution	<ul style="list-style-type: none"> • If one exclusion is claimed, but one measure is attested to, the 10 points will be granted for the Public Health and Clinical Data Exchange objective. • If two exclusions are claimed, then the 10 points will be redistributed to the Provide Patients Electronic Access to their Health Information measure.

Electronic Reportable Laboratory Result Reporting Measure

Measure Name:	Electronic Reportable Laboratory Result Reporting
Measure Description	The eligible hospital or CAH is in active engagement with a PHA to submit electronic reportable laboratory (ELR) results.
Maximum Points Available	10 points
Yes/No Attestation	Yes/No Attest to two measures under the Public Health and Clinical Data Exchange objective
Exclusion Available?	Yes Any eligible hospital or CAH meeting one or more of the following criteria may be excluded from the ELR result reporting measure if the eligible hospital or CAH: <ul style="list-style-type: none"> • Does not perform or order laboratory tests that are reportable in their jurisdiction during the electronic health record (EHR) reporting period; • Operates in a jurisdiction for which no PHA is capable of accepting the specific ELR standards required to meet the certified electronic health record technology (CEHRT) definition at the start of the EHR reporting period; or • Operates in a jurisdiction where no PHA has declared readiness to receive ELR results from an eligible hospital or CAH as of six months prior to the start of the EHR reporting period.
If exclusion claimed, points re-distribution	<ul style="list-style-type: none"> • If one exclusion is claimed, but one measure is attested to, the 10 points will be granted for the Public Health and Clinical Data Exchange objective. • If two exclusions are claimed, then the 10 points will be redistributed to the Provide Patients Electronic Access to their Health Information measure.

Security Risk Analysis Measure

- Eligible hospitals and CAHs must conduct or review a security risk analysis of CEHRT including addressing encryption/security of data, and implement updates as necessary at least once each calendar year and attest to conducting the analysis or review
- It is acceptable for the security risk analysis to be conducted outside the EHR reporting period; however the analysis must be conducted within the calendar year of the EHR reporting period
- It remains a requirement of the Medicare Promoting Interoperability Program, but is not scored
- A Yes/No attestation is required

Scoring Methodology

Electronic Prescribing

OBJECTIVES	MEASURE	MAXIMUM POINTS
Electronic Prescribing	e-Prescribing	10 points
	Bonus: Query of PDMP	5 bonus points

Health Information Exchange

OBJECTIVES	MEASURE	MAXIMUM POINTS
Health Information Exchange	Support Electronic Referral Loops by Sending Health Information	20 points
	Support Electronic Referral Loops by Receiving and Reconciling Health Information	20 points

Provider to Patient Exchange

OBJECTIVES	MEASURE	MAXIMUM POINTS
<p>Provider to Patient Exchange</p>	<p>Provide Patients Electronic Access to Their Health Information</p>	<p>40 points</p>

Public Health and Clinical Data Exchange

OBJECTIVES	MEASURE	MAXIMUM POINTS
<p>Public Health and Clinical Data Exchange</p>	<ul style="list-style-type: none">• Immunization Registry Reporting• Syndromic Surveillance Reporting• Electronic Case Reporting• Public Health Registry Reporting• Clinical Data Registry Reporting• Electronic Reportable Laboratory Result Reporting	<p>10 points (for choosing any 2 of the available measures)</p>

Scoring Example

Objectives	Measures	Numerator/ Denominator	Performance Rate	Max. Points Available	Score
Electronic Prescribing	e-Prescribing	200/250	80%	10 points	8 points
	Bonus: Query of PDMP	Yes	N/A	5 bonus points	5 bonus points
Health Information Exchange	Support Electronic Referral Loops by Sending Health Information	135/185	73%	20 points	15 points
	Support Electronic Referral Loops by Receiving and Reconciling Health Information	145/175	83%	20 points	17 points
Provider to Patient Exchange	Provide Patients Electronic Access to Their Health Information	350/500	70%	40 points	28 points
Public Health and Clinical Data Exchange	Choose any two of the following: Syndromic Surveillance Reporting Immunization Registry Reporting Electronic Case Reporting Public Health Registry Reporting Clinical Data Registry Reporting Electronic Reportable Laboratory Result Reporting	Yes	N/A	10 points	10 points
Total Score					83 points

eCQM Reporting Requirements

eCQM Requirements

- Report on 4 self-selected eCQMs of the 8 available
- Report on 2 self-selected quarters of data

Additional Requirements

Additional Requirements

- In addition to meeting the other program requirements, eligible hospitals and CAHs must complete the following requirements:
 - Submit “Yes” to the Prevention of Information Blocking Attestations
 - Submit “Yes” to the ONC Direct Review Attestation

Reporting Timeline

2021 EHR Reporting Timeline



2021

- Begins January 1, 2021
- Ends December 31, 2021

February 26, 2022

- February 28, 2022 Deadline
- Must attest through the Hospital Quality Reporting System (also referred to as the QualityNet Secure Portal)

2022

- Eligible Hospitals can submit Hardship Exception Application no later than – July 1
- CAHs can submit Hardship Exception Application no later than – November 30

2021- 2023

- Eligible Hospitals (first year) 2022 and 2023
- Eligible Hospital (returning) 2023
- CAHs 2021

Additional Resources

Additional Resources

- For more information on final changes to the Medicare Promoting Interoperability Program in CY 2021:
 - Review the [press release](#) on final rule (CMS-1735-F)
 - Review [fact sheet](#) on final rule (CMS-1735-F)
 - View final rule (CMS-1735-F) on [Federal Register](#)
 - Visit [CMS website](#)
 - Subscribe to [CMS Promoting Interoperability Programs listserv](#)
- The slides, transcript, and recording of today's webinar will be posted in the coming weeks to the Promoting Interoperability Programs Events webpage: <https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/EventsPI>

Question & Answer Session

Question & Answer Session

You can ask questions in various ways, including:

- **Phone** – Dial 1-833-376-0535
 - If prompted, use passcode: 4309315
 - Press *1 to be added to the question queue
- **Chat** – Type your question into the “Questions” box

CMS subject matter experts will answer questions at the end of the webinar as time permits.

Thank you!