

# Meaningful Use

2015 – 2017 Stage 1 / 2 PRELIMINARY Revised Regulations

May 2015



#### "Logistic"

- Announced April 10, 2015
- Public Comments due by June 9, 2015
- Final regulations by end of summer 2015
- EH will be on calendar year: January December
- EH can attest from October 1, 2014 December 2015 (15 months).
- 90 rolling days (not a year) in 2015
- 365 days in 2016 +
- Must have 2014 CEHR code in place (not 2015 code)
- Cannot attest before January 2016 (penalties)
- Stage 3, mandatory 2018, optional in 2017



## Current

First Year MU	Stage of Meaningful Use										
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021+
2011	1	1	1	2*	2	2	2 or 3	3	3	3	3
2012		1	1	2*	2	2	2 or 3	3	3	3	3
2013			1	1*	2	2	2 or 3	3	3	3	3
2014				1*	1	2	2 or 3	3	3	3	3
2015					1	1	1,2,3	3	3	3	3
2016						1	1,2,3	3	3	3	3
2017							1,2,3	3	3	3	3
2018 +								3	3	3	3



#### Proposed

First Payment	Stage of Meaningful Use				
Year	2015	2016	2017	2018	
2011	Modified Stage 2	Modified Stage 2	Modified Stage 2 Or Stage 3	Stage 3	
2012	Modified Stage 2	Modified Stage 2	Modified Stage 2 Or Stage 3	Stage 3	
2013	Modified Stage 2	Modified Stage 2	Modified Stage 2 Or Stage 3	Stage 3	
2014	Modified Stage 2*	Modified Stage 2	Modified Stage 2 Or Stage 3	Stage 3	
2015	Modified Stage 2*	Modified Stage 2	Modified Stage 2 Or Stage 3	Stage 3	
2016	- NA -	Modified Stage 2	Modified Stage 2 Or Stage 3	Stage 3	

<sup>\*</sup>Modifications to Stage 2 proposed include exceptional provisions for certain objectives and measures for providers scheduled to be in Stage 1 in 2015 to accommodate these changes



#### "Meat of Regulations"

- BOTH stage 1 and Stage 2 will be changed.
- Reduce # of objectives
- Remove objectives
- Everything becomes Core in 2015 +, no menu



## Significant Changes

TABLE 3: OBJECTIVES AND MEASURES IDENTIFIED BY PROVIDER TYPE WHICH ARE REDUNDANT, DUPLICATIVE OR TOPPED OUT

Provider Type	Objectives and Measures			
	Record Demographics	42 CFR §495.6 (j)(3)(i) and (ii)		
	Record Vital Signs	42 CFR §495.6 (j)(4) (i) and (ii)		
	Record Smoking Status	42 CFR §495.6 (j)(5) (i) and (ii)		
	Clinical Summaries	42 CFR §495.6 (j)(11) (i) and (ii)		
	Structured Lab Results	42 CFR §495.6 (j)(7) (i) and (ii)		
Elicible	Patient List	42 CFR §495.6 (j)(8) (i) and (ii)		
Eligible Professional	Patient Reminders	42 CFR §495.6 (j)(9) (i) and (ii)		
Fiolessional	Summary of Care	42 CFR §495.6 (j)(14) (i) and (ii)		
	Measure 1 – Any Method			
	Measure 3 – Test			
	Electronic Notes	42 CFR §495.6 (j)(9) (i) and (ii)		
	Imaging Results	42 CFR §495.6 (k)(6) (i) and (ii)		
	Family Health History	42 CFR §495.6 (k)(2) (i) and (ii)		
	Record Demographics	42 CFR §495.6 (l)(2) (i) and (ii)		
	Record Vital Signs	42 CFR §495.6 (l)(3) (i) and (ii)		
	Record Smoking Status	42 CFR §495.6 (l)(4) (i) and (ii)		
	Structured Lab Results	42 CFR §495.6 (l)(6) (i) and (ii)		
	Patient List	42 CFR §495.6 (l)(7) (i) and (ii)		
	Summary of Care	42 CFR §495.6 (l)(11) (i) and (ii)		
Eligible	Measure 1 – Any Method			
Hospital/CAH	Measure 3 – Test			
	eMAR	42 CFR §495.6 (l)(16) (i) and (ii)		
	Advanced Directives	42 CFR §495.6 (m)(1) (i) and (ii)		
	Electronic Notes	42 CFR §495.6 (m)(2) (i) and (ii)		
	Imaging Results	42 CFR §495.6 (m)(2) (i) and (ii)		
	Family Health History	42 CFR §495.6 (m)(3) (i) and (ii)		
	Structure Labs to Ambulatory Providers	42 CFR §495.6 (m)(6) (i) and (ii)		



## Significant Changes (2015-2017)

TABLE 4: CURRENT STAGE STRUCTURE, RETAINED OBJECTIVES, AND PROPOSED STRUCTURE

	Current Stage 1 Structure	Retained Objectives	Proposed Structure
EP	13 core objectives	6 core objectives	9 core objectives
	5 of 9 menu objectives	3 menu objectives	1 public health objective (2
	including 1 public health	2 public health objectives	measure options
	objective		
EH/	11 core objectives	5 core objectives	8 core objectives
CAH	5 of 10 menu objectives	3 menu objectives	1 public health objective (3
	including 1 public health	3 public health objectives	measure options)
	objective		

	Current Stage 2 Structure	Retained Objectives	Proposed Structure
EP	17 core objectives including	9 core objectives	9 core objectives
	public health objectives	0 menu objectives	1 public health objective (2
	3 of 6 menu objectives	4 public health objectives	measure options)
EH/	16 core objectives including	7 core objectives	8 core objectives
CAH	public health objectives	1 menu objective	1 public health objective (3
	3 of 6 menu objectives	3 public health objectives	measure options)



#### Stage 1 Alternatives for 2015

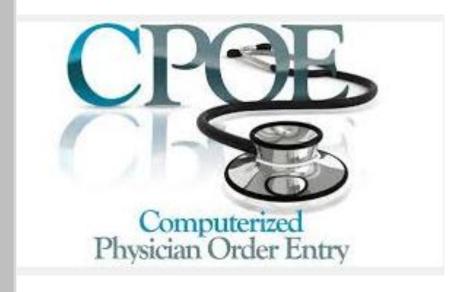
#### Report Stage 2 but

- Maintain the lower thresholds for Stage 1. Example: eRx is at 40% in Stage 1 and 50% in Stage 2. Could use 40%
- Apply for exclusion for those measures who do not have a Stage 1 component. Example: Summary of Care is menu in Stage 1, could apply for exclusion in 2015



#### **CPOE**

	Stage 1	Stage 2 (current)	2015-2017 Proposed	Stage 3 Proposed
Medication	30%	60%	60%	80%
Labs		30%	30%	60%
Diagnostic Images		30%	30%	60%



- Expansion to include diagnostic imaging
- Protocol and standing orders may be excluded



#### ePrescribing

	Stage 1	Stage 2 Current	2015-2017 Proposed	Stage 3 Proposed
EP (providers)	40% Core	50% Core	50%	80%
EH (hospitals)		10% Menu	10%	25%

- Drug formulary checking enabled
- May include eRX of controlled substances in states where allowed



#### Clinical Decision Support

	Stage 1	Stage 2	2015- 2017 Proposed	Stage 3 Proposed
EP (providers)	1 CDS	5 CDS tied to 4 QM	5 CDS tied to 4 QM	5 CDS tied to 4 QM
Drug Drug Drug Allergy	Enabled	Enabled	Enabled	Enabled

Clinical Decision Support Systems (CDSS)



# Patient Access (VDT) / Engagement / Coordination of Care

	Stage 1	Stage 2	2015- 2017 Proposed	Stage 3 Proposed
Patient Access *	10% Menu 50% Core (later added)	50% Core	50% (Stage 1 and Stage 2)	80%
Patient Use		5% Core	1 patient	25% Portal or API
Secure messaging		5% Patient to Office (EP)	Enable (EP)	35% Hospital/Office to Patient or back (EP and EH)
Electronically incorporate information from patient or other sites *				15%









#### Education

	Stage 1		2015-2017 Proposed	Stage 3
Patient	10%	10%	10%	35%
Education	Menu	Core	Core	Core **

\*\* Patient education provided electronically









#### Med Rec

	Stage 1		2015-2017 Proposed	Stage 3
Medication	50%	50%	50%	See next slide
Reconciliation	Menu	Core	Core	









# Summary or Care (CCDA) / HIE

	Stage 1	Stage 2	2015-2017	Stage 3
	Stage	Staye 2	Proposed	Stage 3 Proposed
Summary of Care (paper, electronic or fax)	50% Menu	50% Core		
Summary of Care (electronic)		10% Core	10% Core, created by EHR	50% No exemption for less than 100 referrals
Test to outside EHR		One		
Incorporate electronic summary of care for transitions into practice				40%
Reconciliation for transitions into practice				80% medications, problem list, allergies

<sup>•</sup>Meet 2 of 3 measures

<sup>•</sup>Report on all 3

<sup>•</sup>Common Data set expanded

# Secure Messaging

	Stage 1		2015-2017 Proposed	
Secure Messaging		5% Core	Enable (send and receive)	35% Hospital/Office to Patient



## Public Health

	Stage 1	Stage 2	2015-2017 Proposed	Stage 3 Proposed
MICR	Menu (EH, EP)	Ongoing submission (EH, EP) Core		
Syndromic Surveillance	Menu (EH, EP)	Ongoing submission (EH Core, EP Menu)		
Reportable Labs	Menu (EH)	Ongoing submission EH Core		
Specialized Registry		Menu (EP)		
Cancer Registry		Menu (EP)		
Public Health Reporting			EP 3 (of 5) submission EH 4 (of 6) submission	EP 3 (of 5) submission EH 4 (of 6) Submission

#### Public Health/Registries

\*Public health and clinical data registry reporting: There are 6 measures. "Active engagement" is required for:

- immunizations;
- syndromic surveillance;
- reportable conditions case reporting (local, state, national PHA), not in stage 2;
- public health registries (local, state, national public health agency (PHA);
- non-public health registries (used to monitor Quality and Resource Use);
- electronic lab reporting.

EPs need to choose 3, and EHs need to choose 4.



#### Public Health/Registries

#### Measures for Objective 8; Public Health and Clinical Data Registry Reporting Objective

Measure	Maximum times measure can count towards objective for EP	Maximum times measure can count towards objective for EH or CAH
Measure 1- Immunization Registry Reporting	1	1
Measure 2- Syndromic Surveillance Reporting	1	1
Measure 3-Case Reporting	1	1
Measure 4-Public Health Registry Reporting*	3	4
Measure 5-Clinical Data Registry Reporting**	3	4
Measure 6- Electronic Reportable Laboratory Results	NA	1



transforming health through IT



#### Quality Measures (EP)

Proposing no changes to CQM selection or reporting scheme from CQM requirements in Stage 2 rule

For EHR reporting period in 2015 (and for providers participating for first time in 2016), proposing providers attest to any continuous 90-day period of CQM data during calendar year through Medicare EHR Incentive Program

Registration and Attestation site – Providers also have option to electronically report CQM data using established methods for electronic reporting

For 2016 and subsequent years, providers beyond first year of meaningful use may attest to one full calendar year of CQM data or electronically report CQM data using established methods for electronic reporting outlined



#### **Public Comments**

#### **How to Submit Comments**

The public can submit comments

(https://www.federalregister.gov/articles/2015/03/30/2015-06685/medicare-and-medicaid-programs-

electronic-health-record-incentive-program-stage-3) in several ways, including via

electronic submission or mail:

Electronically

You may submit electronic comments to

http://www.regulations.gov

 $\underline{\text{(http://www.regulations.gov/\#!documentDetail;D=CMS\_FRDOC\_0001-1668)}}.\ Follow\ the$ 

"Submit a comment" instructions.

By regular mail

By express or overnight mail

By hand or courier



## Questions



