

Requirements for Electronic Health Record (EHR) Vendors to Participate in the 2011 PQRI EHR Program

Background

The Physician Quality Reporting Initiative (PQRI) was initially implemented in 2007. For the 2007 PQRI reporting period (that is July 1, 2007 through December 31, 2007), quality data codes were accepted only through claims submission. In the 2008 Medicare Physician Fee Schedule (PFS) proposed rule and final rule with comment period, CMS described its plans to test mechanisms for submission of quality measures results and/or data through registries and electronic health records during 2008. CMS tested the submission of clinical quality data submitted from EHR vendors for five 2008 PQRI measures. In the 2009 Medicare Part B PFS proposed rule, CMS proposed to begin accepting submission of clinical quality data submitted from EHR systems on January 1, 2009, or as soon thereafter as was technically feasible, based upon completion of the 2008 EHR data submission testing process. However, as described in the Medicare 2009 PFS final rule with comment period (73 FR 69828 through 69830), it was ultimately determined that accepting data from EHR vendors on clinical quality measures for the 2009 PQRI program was not practical. Rather, additional testing of the feasibility of submission of clinical quality data submitted from EHR vendors occurred in 2009. In the 2010 Medicare PFS proposed rule, CMS again proposed to begin accepting submission of clinical quality data extracted from "qualified" EHRs on January 1, 2010, or as soon thereafter as is technically feasible. The EHR-based reporting mechanism was finalized in the 2010 Medicare PFS final rule dependent upon the completion of the 2009 PQRI EHR testing process by one or more participating EHR vendors.

EHR Vendor Qualification Requirements for the 2011 PQRI EHR Testing Process that will occur in 2010

For an EHR vendor and their product to qualify to submit test information on 2011 PQRI measures, the EHR system must be updated according to the Draft 2011 EHR Measure Specifications which will be posted on the PQRI section of the CMS Web site (<http://www.cms.hhs.gov/pqri>) in the Summer of 2010.

In addition, 2011 PQRI EHR vendors must meet the following requirements:

- Be able to collect and transmit all required data elements according to the 2011 EHR Data Submission Specifications.
- Be able to separate out and report on Medicare Part B PFS patients only.
- Be able to include TIN/NPI information submitted with an eligible professional's (EP's) quality data.
- Be able to transmit this data in the CMS-approved format.
- Comply with a secure method for data submission.
- Participate in ongoing PQRI mandatory support conference calls hosted by CMS (approximately one call per month). Failure to attend more than one call per year will result in the removal of the EHR vendor from the EHR testing process that will occur in 2010.

EHR Vendor Qualification Process

EHR vendors who wish to qualify to participate in the 2011 PQRI EHR program should submit a self-nomination letter requesting inclusion in the 2011 PQRI testing process in 2010. The letter should be sent to:

**PQRI EHR Nomination
Centers for Medicare & Medicaid Services
Office of Clinical Standards and Quality
Quality Measurement and Health Assessment Group
7500 Security Boulevard
Mail Stop S3-02-01
Baltimore, MD 21244-1850**

The letter must be received no later than **5 p.m. on January 31, 2010**. Failure to meet this milestone will preclude the EHR vendor from testing their system and from possible subsequent qualification to submit 2011 PQRI quality measure data from their EHR product.

EHR vendors who participated in the 2009 EHR testing process and were fully “qualified” to report PQRI for 2010 will not need to go through the full requalification process for 2011 but may need to update their system’s based off of changes to specifications, etc. EHR vendors who participated in the 2009 EHR testing process and were not fully “qualified” will need to go through a full qualification process as described below. Those EHR vendors must submit a self-nomination letter to the above address no later than **January 31, 2010**.

The process for qualifying EHR vendor systems to submit clinical quality data by EPs for the 2011 PQRI EHR program are expected to follow the process listed below:

1. Vendors will self-nominate their EHR product as described above.
2. Nominees will go through a vetting process consisting of an interview and a 3-step testing process.
3. Those vendors passing step 2 will be asked to submit TEST data (that is, mock-up data) in the CMS-approved file format.
4. Vendors who pass step 3 will need to be able to adapt their system to any changes in the measure specifications that may arise due to Healthcare Information Technology Standards Panel (HITSP) or Certification Commission for Healthcare Information Technology (CCHIT) adoption of quality measure data reporting criteria.

CMS will post on the PQRI website at <http://www.cms.hhs.gov/pqri> the names of those EHR vendors and their version-specific products (i.e. soap notes version 2.1) that have met all of the EHR vendor requirements and have passed the qualification process. These qualified products’ users may submit quality data directly from their EHRs to CMS for the 2011 PQRI program year or subsequent years.

All of the information contained within this document will also apply for EHR vendors that would like to become qualified to report on the electronic prescribing (eRx) measure for the 2011 eRx Incentive Program. EHR vendors that want to report for the 2011 Group Practice Reporting Option (GPRO) for the eRx measure will also have to follow the requirements contained in this document. Any EHR vendor that wants to report on the eRx measure and/or the eRx measure for GPRO should indicate this in their self-nomination letter.