



EHR Incentive Programs in 2016: Alternate Exclusions



In 2015, CMS published a [final rule](#) that specifies criteria that eligible professionals (EPs), eligible hospitals, and critical access hospitals (CAHs) must meet in order to participate in the Medicare and Medicaid Electronic Health Record (EHR) Incentive Programs for 2015 through 2017.

The final rule includes alternate exclusions for certain objectives and measures in 2015 and 2016 where there is not a Stage 1 measure equivalent to the Modified Stage 2 (2015 through 2017) measure, where a menu measure in any stage is now a requirement, or where additional technologies or CEHRT modules are required (80 FR 62789).

Overview of Alternate Exclusions in 2016

Many of the alternate exclusions that were available in 2015 are **not applicable** in 2016. However, to assist Stage 1 providers in 2016, there are alternate exclusions defined for the Computerized Provider Order Entry (CPOE) objective for EPs, eligible hospitals, and CAHs. The CPOE alternate exclusions are based on the provider's scheduled stage and are intended to accommodate changes required for the transition to the Modified Stage 2 objectives and measures, especially potential changes to the implementation of CEHRT.

Eligible hospitals and CAHs may claim an alternate exclusion under the Electronic Prescribing (eRx) objective. This alternate exclusion is intended to allow providers adequate time to update systems and workflows to support successful and safe implementation of electronic prescribing.

Providers may claim an alternate exclusion for certain public health reporting measure(s) that might require acquisition of additional technologies that they did not previously have or did not previously intend to include in their activities for meaningful use.

Providers may opt to use the alternate exclusions, but they **are not required** to use them.

How to Attest Using Alternate Exclusions

The Medicare and Medicaid EHR Incentive Programs registration and attestation system will automatically identify those providers who are eligible for alternate exclusions. Upon attestation, these providers will be offered the option to attest to the objective and measure, *and* the option to attest to the alternate exclusion, if applicable. The provider may independently select the option available to them for each measure for which an alternate exclusion may apply.

Alternate Exclusions in 2016

There are **two objectives for EPs** and **three objectives for eligible hospitals and CAHs** that include alternate exclusions for providers in 2016.

Alternate Exclusions

Eligible Professionals (EPs)

<p>Objective 3: Computerized Provider Order Entry</p>	<p>Alternate Exclusion for Measure 2: Providers scheduled to be in Stage 1 in 2016 may claim an exclusion for measure 2 (laboratory orders) of the Stage 2 CPOE objective for an EHR reporting period in 2016.</p> <p>Alternate Exclusion for Measure 3: Providers scheduled to be in Stage 1 in 2016 may claim an exclusion for measure 3 (radiology orders) of the Stage 2 CPOE objective for an EHR reporting period in 2016.</p>
<p>Objective 10: Public Health Reporting</p>	<p>Alternate Exclusion for Measure 2: EPs may claim an alternate exclusion for measure 2 (syndromic surveillance reporting) for an EHR reporting period in 2016.</p> <p>Alternate Exclusion for Measure 3: EPs may claim an alternate exclusion for measure 3 (specialized registry reporting) for an EHR reporting period in 2016.</p>
<h3><i>Eligible Hospitals and CAHs</i></h3>	
<p>Objective 3: Computerized Provider Order Entry</p>	<p>Alternate Exclusion for Measure 2: Providers scheduled to be in Stage 1 in 2016 may claim an exclusion for measure 2 (laboratory orders) of the Stage 2 CPOE objective for an EHR reporting period in 2016.</p> <p>Alternate Exclusion for Measure 3: Providers scheduled to be in Stage 1 in 2016 may claim an exclusion for measure 3 (radiology orders) of the Stage 2 CPOE objective for an EHR reporting period in 2016.</p>
<p>Objective 4: Electronic Prescribing (eRx)</p>	<p>Alternate Exclusion: An eligible hospital or CAH may claim an exclusion for the eRx objective and measure if for an EHR reporting period in 2016 if they were either scheduled to demonstrate Stage 1 in 2016, or if they are scheduled to demonstrate Stage 2 but did not intend to select the Stage 2 eRx objective for an EHR reporting period in 2016.</p>
<p>Objective 9: Public Health Reporting</p> <p>(Objective 10 in the final rule; 495.22 (e)(10)(ii)(C))</p>	<p>Alternate Exclusion for Measure 3: Eligible hospitals and CAHs may claim an alternate exclusion for measure 3 (specialized registry reporting) for an EHR reporting period in 2016.</p>