

2019 IPPS Final Rule: Medicare Promoting Interoperability Program Changes

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Topics

- **Program Name Change Reminder: *Promoting Interoperability(PI) Programs***
- **2019 and 2020 EHR Reporting Periods and CEHRT**
- **Objective/Measure Changes in 2019**
- **Scoring Methodology**
- **PI Program Attestation Requirements**
- **CQMs**
- **Puerto Rico Hospitals Participation**

Program Name Change Reminder

CMS renamed the EHR Incentive Programs to the **Medicare and Medicaid Promoting Interoperability (PI) Programs** to:

- Align with the overhaul of the programs
- Focus on measures and objectives that furthers interoperability
- Signals a change in how we view patient data and the safe transmission in health record systems

EHR Reporting Periods

CMS finalized a 90-day report period for PI Programs in 2019 and 2020:

- Required to report a minimum of any continuous 90-day period between January 1-December 31 for both 2019 and 2020
- Reporting period is same for **all** participants

Certification Requirements Beginning in 2019

2015 Edition CEHRT Required

- The functionality must be in place for selected EHR reporting period, which is any continuous 90-day period
- The health IT product must be certified to the 2015 Edition by the last day of the selected reporting period.

Scoring Methodology

New performance-based scoring methodology for eligible hospitals and CAHs

Eligible hospitals and CAHs must earn a minimum total score of **50 points** in order to satisfy the requirement to report on the objectives and measures of meaningful use

Eligible hospitals and CAHs must submit a complete numerator and denominator or yes/no data for all required measures (83 FR 41641) to earn a score greater than zero (must also complete activities required by the Security Risk Analysis measure)

When calculating performance rates and measure and objective scores, we generally will round to the nearest whole number

Medicare Promoting Interoperability Program Objectives and Measures

Medicare PI Program Measures Removed for 2019

Coordination of Care through Patient Engagement Objective

- **All** associated measures

Patient Electronic Access to Health Information Objective

- Patient Specific Education measure

Health Information Exchange Objective

- Request/Accept Summary of Care measure
- Clinical Information Reconciliation measure

2018 vs 2019 Objective and Measure Changes

2018 PI Objectives & Measures

Objective: Patient Electronic Access to Health Information

Measure: Provide Patient Access

Objective: Health Information Exchange

Measure: Send a Summary of Care

Objective: Public Health and Clinical Data Registry Reporting



2019 PI Objectives & Measures

Objective Name: Provider to Patient Exchange

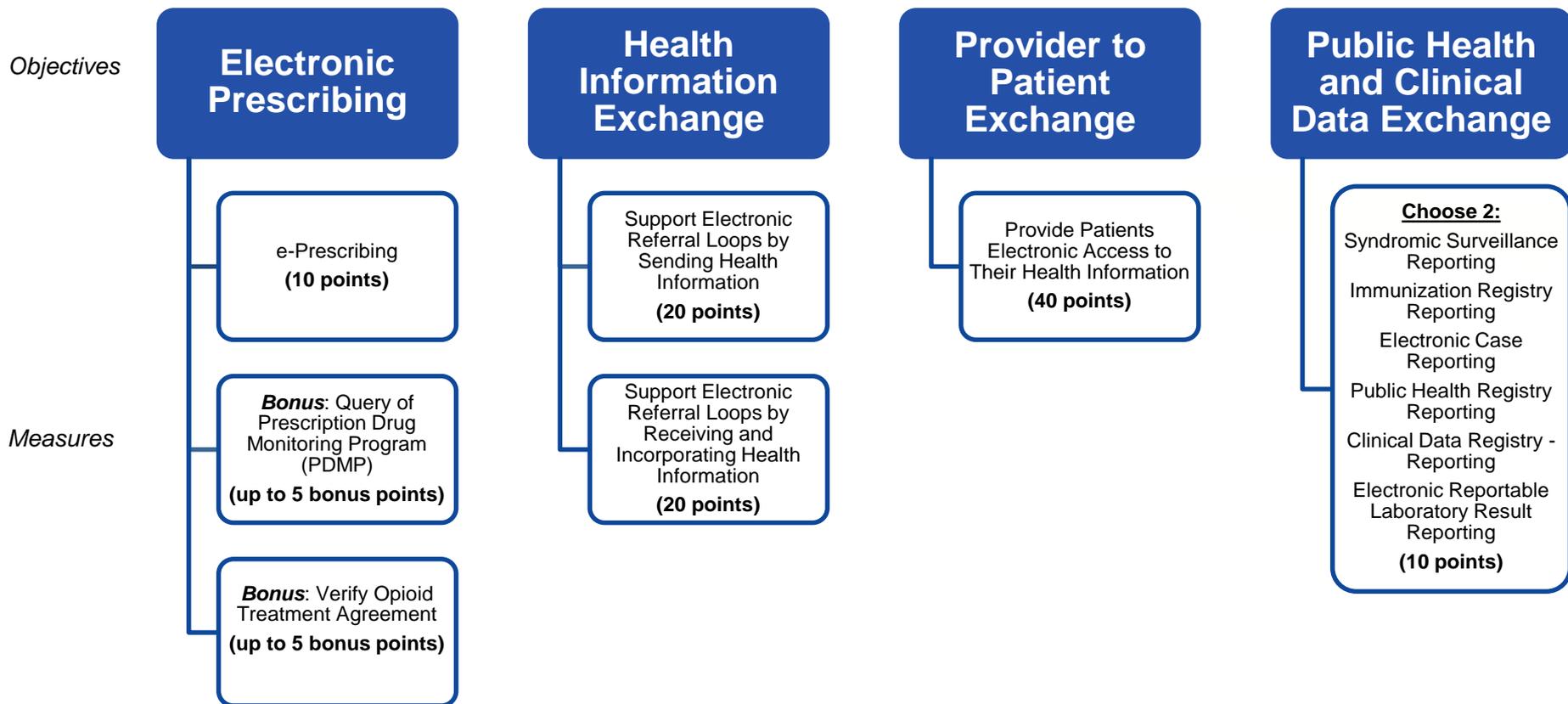
Measure Name: Provide Patients Electronic Access to Their Health Information

Objective: Health Information Exchange (No Change)

Measure Name: Supporting Electronic Referral Loops by Sending Health Information

Objective Name: Public Health and Clinical Data Exchange

Medicare Scoring Methodology in CY 2019

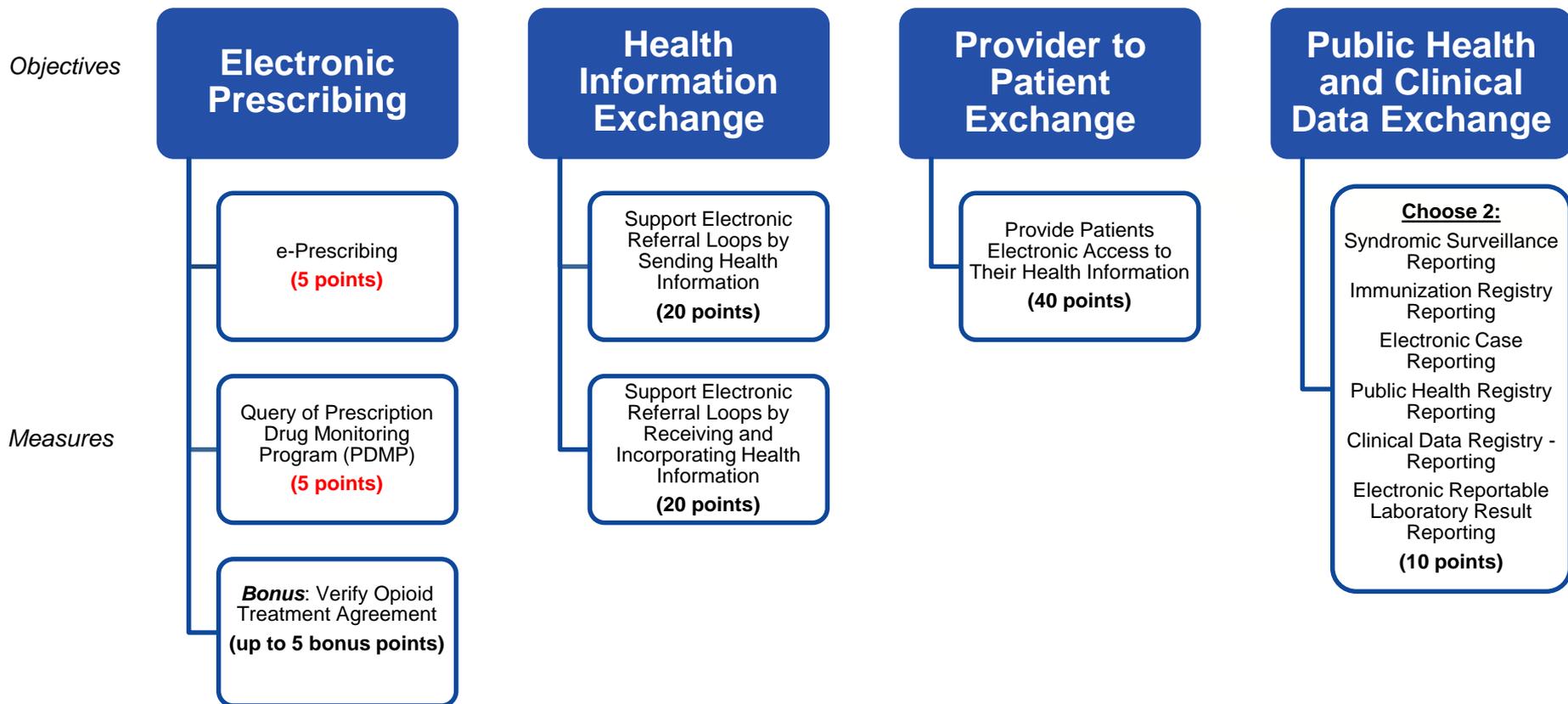


**Security Risk Analysis is retained, but not included as part of the scoring methodology*

Scoring Methodology: CY 2019 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 Prescription Drug Monitoring Program (PDMP)	25/75	33%	5 point bonus	5 bonus points
	Bonus: Verify Opioid Treatment Agreement	N/A	N/A	5 point bonus	N/A
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 Incorporating 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

Medicare Scoring Methodology in CY 2020



**Security Risk Analysis is retained, but not included as part of the scoring methodology*

Scoring Methodology: CY 2020 Example

Objective	Measures	Numerator/ Denominator	Performance Rate	Max Points Available	Score
e-Prescribing	e-Prescribing	200/250	80%	5 points	4 points
	Query of Prescription Drug Monitoring Program	150/175	86%	5 points	4 points
	<i>Bonus:</i> Verify Opioid Treatment Agreement	57/352	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 Incorporating 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	<u>Choose any two of the following:</u> 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

Measures Exclusions in 2019 vs 2020

Objectives	Measures	CY 2019 Exclusion Available	CY 2020 Exclusion Available
Electronic Prescribing	e-Prescribing	Yes	Yes
	Bonus: Query of Prescription Drug Monitoring Program (PDMP)	No	<u>Yes</u>
	Bonus: Verify Opioid Treatment Agreement	No	No
Health Information Exchange	Support Electronic Referral Loops by Sending Health Information	No	No
	Support Electronic Referral Loops by Receiving and Incorporating Health Information	Yes	<u>No</u>
Provider to Patient Exchange	Provide Patients Electronic Access to Their Health Information	No	No
Public Health and Clinical Data Exchange	<u>Choose any two of the following:</u> Syndromic Surveillance Reporting Immunization Registry Reporting Electronic Case Reporting Public Health Registry Reporting Clinical Data Registry Reporting Electronic Reportable Laboratory Result Reporting	Yes	Yes

Electronic Prescribing Objective

Three (3) Measures:



e-Prescribing



Query of Prescription Drug Monitoring Program (PDMP)



Verify Opioid Treatment Agreement

Measure #1: e-Prescribing

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	CY 2019: 10 points CY 2020: 5 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	CY 2019: 10 points would be redistributed equally among the measures under the Health Information Exchange objective CY 2020: 5 points would be redistributed equally among the measures under the Health Information Exchange objective

Measure #2: Query of PDMP

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	CY 2019: up to 5 <i>bonus</i> points CY 2020: 5 points (required)
Numerator	The number of Schedule II opioid prescriptions in the denominator for which data from CEHRT is used to conduct a query of a PDMP for prescription drug history except where prohibited and in accordance with applicable law.
Denominator	Number of Schedule II opioids electronically prescribed using CEHRT by the eligible hospital or CAH during the EHR reporting period.
Exclusion Available?	<p>CY 2019: No CY 2020: Yes</p> <ul style="list-style-type: none"> Any eligible hospital or CAH that is unable to report on the measure in accordance with applicable law may be excluded from the measure. 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. Note: If an exclusion is claimed for the e-Prescribing measure, an exclusion is automatically given for the Query of PDMP measure.
If exclusion claimed, points re-distribution	<p>CY 2019: N/A CY 2020: Points would be redistributed equally among the measures under the Health Information Exchange objective</p>

Measure #3: Verify Opioid Treatment Agreement

Measure Name:	Verify Opioid Treatment Agreement
Measure Description	For at least one unique patient for whom a Schedule II opioid was electronically prescribed by the eligible hospital or CAH using CEHRT during the EHR reporting period, if the total duration of the patient's Schedule II opioid prescriptions is at least 30 cumulative days within a 6-month look-back period, the eligible hospital or CAH seeks to identify the existence of a signed opioid treatment agreement and incorporates it into CEHRT
Maximum Points Available	CYs 2019 and 2020: up to 5 <i>bonus</i> points
Numerator	The number of unique patients in the denominator for whom the eligible hospital or CAH seeks to identify a signed opioid treatment agreement and, if identified, incorporates the agreement in CEHRT.
Denominator	Number of unique patients for whom a Schedule II opioid was electronically prescribed by the eligible hospital or CAH using CEHRT during the EHR reporting period and the total duration of Schedule II opioid prescriptions is at least 30 cumulative days as identified in the patient's medication history request and response transactions during a 6-month look-back period
Exclusion Available?	CYs 2019 and 2020: No
If exclusion claimed, points re-distribution	N/A

Review

Objective	Measure	Maximum Points CY 2019	Exclusion available in CY 2019?	Maximum Points CY 2020	Exclusion available in CY 2020?
Electronic Prescribing	e-Prescribing	10 points	Yes	5 points	Yes
	Query of PDMP	Up to 5 <i>bonus</i> points	No	5 points	Yes
	Verify Opioid Treatment Agreement	Up to 5 <i>bonus</i> points	No	5 <i>bonus</i> points	No

Health Information Exchange Objective

Two (2) Measures:



Support Electronic Referral Loops
by Sending Health Information



Support Electronic Referral Loops by
Receiving and Incorporating Health Information

Measure #1: Support Electronic Referral Loops by Sending Health Information

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	CYs 2019 & 2020: 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
If exclusion claimed, points re-distribution	N/A



Measure #2: Support Electronic Referral Loops by Receiving and Incorporating Health Information

Measure Name:	Support Electronic Referral Loops by Receiving and Incorporating 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	CYs 2019 & 2020: 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?	CY 2019: Yes, as it may not be available or fully developed by their health IT vendor, or not fully implemented in time for an EHR reporting period in 2019. CY 2020: No
If exclusion claimed, points re-distribution	CY 2019: 20 points would be redistributed to the Support Electronic Referral Loops by Sending Health Information measure, and that measure would then be worth 40 points. CY 2020: N/A

Review

Objective	Measure	Maximum Points CY 2019	Exclusion available in CY 2019?	Maximum Points CY 2020	Exclusion available in CY 2020?
Health Information Exchange	Support Electronic Referral Loops by Sending Health Information	20 points	No	20 points	No
	Support Electronic Referral Loops by Receiving and Incorporating Health Information	20 points	Yes	20 points	No

Provider to Patient Exchange

One (1) Measure:



Provide Patients Electronic Access
to Their Health Information

Measure #1: Provide Patients Electronic Access to Their Health Information

Measure Name:	Provide Patients Electronic Access to Their Health Information
Measure Description	<p>For at least one unique patient discharged from the eligible hospital or CAH inpatient or emergency department (POS 21 or 23):</p> <ul style="list-style-type: none"> • The patient (or the 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 API in the eligible hospital or CAH's CEHRT.
Maximum Points Available	CYs 2019 & 2020: 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
If exclusion claimed, points re-distribution	N/A

Provider to Patient Exchange Objective Review

Objective	Measure	Maximum Points CY 2019	Exclusion available in CY 2019?	Maximum Points CY 2020	Exclusion available in CY 2020?
Provider to Patient Exchange	Provide Patients Electronic Access to Their Health Information	40 points	No	40 points	No

Public Health and Clinical Data Exchange

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

- ① Syndromic Surveillance Reporting
- ② Immunization Registry Reporting
- ③ Electronic Case Reporting

- ④ Public Health Registry Reporting
- ⑤ Clinical Data Registry Reporting
- ⑥ Electronic Reportable Laboratory Result Reporting

Public Health and Clinical Data Exchange Objective

Measure Name:	Public Health and Clinical Data Exchange Objective
Measure Description	An eligible hospital or CAH attests yes to being in active engagement with a public health agency (PHA) or clinical data registry (CDR) to submit electronic public health data in a meaningful way using CEHRT for two measures within the objective.
Maximum Points Available	CYs 2019 and 2020: 10 points
Numerator	N/A Attest to two measures under the Public Health and Clinical Data Exchange objective
Denominator	N/A Attest to two measures under the Public Health and Clinical Data Exchange objective
Exclusion Available?	Yes
If exclusion claimed, points re-distribution	<ul style="list-style-type: none"> - If an exclusion is claimed for one of the two measures, the 10 points may still be awarded for this objective if the eligible hospital or CAH attests yes to being in active engagement with a public health agency (PHA) or clinical data registry (CDR) to submit electronic public health data in a meaningful way using CEHRT. - If an exclusion is claimed for both measures selected for reporting in the objective, the 10 points will be redistributed to the provide patients electronic access to their health information measure under. - Reporting more than two measures for this objective would <u>not</u> earn the eligible hospital or CAH any additional points.

Public Health and Clinical Data Exchange Objective Review

Objective	Measure	Maximum Points CY 2019	Exclusion available in CY 2019?	Maximum Points CY 2020	Exclusion available in CY 2020?
Public Health and Clinical Data Exchange	Syndromic Surveillance Reporting	10 points	Yes- Exclusion for one and report one- 10 points for this objective	10 points	Yes- Exclusion for one and report one- 10 points for this objective
	Immunization Registry Reporting				
	Electronic Case Reporting				
	Public Health Registry Reporting				
	Clinical Data Registry Reporting				
	Electronic Reportable Laboratory Result Reporting				
			Exclusion for two- redistribute points to HIE		Exclusion for two- redistribute points to HIE

Security Risk Analysis

- Measure is required to earn a Medicare Promoting Interoperability Program score greater than zero
- Not included in the new performance-based scoring methodology
- Requirements and actions of the Security Risk Analysis remain the same as currently required in modified Stage 2/Stage 3
 - Conduct or review a security risk analysis in accordance with the requirements under 45 CFR 164.308(a)(1) including addressing the security (including encryption) of data created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), implement security updates as necessary, and correct identified security deficiencies as part of the eligible hospital or critical access hospitals (CAH) risk management process.

Additional Information/Resources:

- Parameters of the Security Risk Analysis were created by the HIPAA Security Rule. Additional information [HIPAA Security Rule](#)
- HHS Office for Civil Rights (OCR) [guidance](#) on conducting a security risk analysis in accordance with the HIPAA Security Rule
- [Free tools](#) and resources available from ONC and OCR

Program Attestation Requirements

Program Attestation Requirements

In addition to reporting on the performance-based scoring methodology objectives and measures for a minimum 90-day EHR reporting period and using the 2015 Edition CEHRT eligible hospitals and CAHs must:

- Provide EHR CEHRT number
- Emergency Department Admissions designation for the denominator of applicable objectives
- Identify performance period and method for Clinical Quality Measures
- Submit a “yes” to the Prevention of Information Blocking Attestation
- Submit a “yes” to the ONC Direct Review Attestation
- Submit a “yes” for the security risk analysis measure
- Attestation Disclaimer

Medicare Promoting Interoperability Program Clinical Quality Measures (CQMs or eCQMs)

Medicare PI Program eCQM Reporting



No changes to CQMs



Reducing the number of
CQMs available from 16 to 8

- *We encourage eligible hospitals and CAHs to submit their CQMs electronically through Hospital IQR*

eCQM Reporting Requirements for CY 2019 Reporting Period (FY 2021 Payment Determination)

FOR HOSPITALS PARTICIPATING IN HOSPITAL IQR PROGRAM

- Report on at least 4 of available eCQMs for 1 self-selected quarter (i.e., 1Q, 2Q, 3Q, or 4Q 2019)
- Submission deadline is February 29, 2020

TECHNICAL REQUIREMENTS

- Use EHR technology certified to 2015 Edition (ONC standards)
- Use eCQM specifications published in 2018 eCQM annual update for 2019 reporting and any applicable addenda, available on eCQI Resource Center website at <https://ecqi.healthit.gov/eh>
- 2019 CMS QRDA Category I Implementation Guide, available at <https://ecqi.healthit.gov/qrda>

Note: Meeting Hospital IQR Program eCQM requirement also satisfies CQM electronic reporting requirement for Medicare Promoting Interoperability Program

Participation in the Medicare Promoting Interoperability Program Subsection (d) Puerto Rico Hospitals

Puerto Rico Hospitals

- Formalizing the Medicare PI Program for eligible hospital hospitals in Puerto Rico
- Previously implemented in 2016 through guidance
- Aligning the requirements with the requirements for other eligible hospitals in the Medicare PI Program

APPENDIX

CY 2019 Scoring & Exclusions

Objectives	Measures	Max Points Available	CY 2019 Exclusion Available	Exclusion	Points Redistribution if Exclusion Claimed
Electronic Prescribing	e-Prescribing	10 points	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	10 points available would be redistributed equally among the measures under the Health Information Exchange objective: <ul style="list-style-type: none"> • Support Electronic Referral Loops By Sending Health Information Measure • Support Electronic Referral Loops By Receiving and Incorporating Health Information
	<i>Bonus:</i> Query of Prescription Drug Monitoring Program (PDMP)	Up to 5 points <i>Bonus</i>	No	No exclusion available	N/A
	<i>Bonus:</i> Verify Opioid Treatment Agreement	Up to 5 points <i>Bonus</i>	No	No exclusion available	N/A
Health Information Exchange	Support Electronic Referral Loops by Sending Health Information	20 points	No	No exclusion available	N/A
	Support Electronic Referral Loops by Receiving and Incorporating Health Information	20 points	Yes	May not be available to all eligible hospitals and CAHs as it may not have been fully developed by their health IT vendor, or not fully implemented in time for an EHR reporting period in 2019	20 points would be redistributed to the Support Electronic Referral Loops by Sending Health Information measure, and that measure would then be worth 40 points
Provider to Patient Exchange	Provide Patients Electronic Access to Their Health Information	40 points	No	No exclusion available	N/A
Public Health and Clinical Data Exchange	<u>Choose any two of the following:</u> Syndromic Surveillance Reporting Immunization Registry Reporting Electronic Case Reporting Public Health Registry Reporting Clinical Data Registry Reporting Electronic Reportable Laboratory Result Reporting	10 points	Yes	Exclusions for each possible measure: https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Downloads/MedicareEHStage3_Obj6.pdf	If one exclusion claimed, but attest to one measure: 10 points remain for this objective If two exclusions claimed, then 10 points redistributed to the Provide Patients Electronic Access to their Health Information

CY 2020 Scoring & Exclusions

Objectives	Measures	Max Points	CY 2020 Exclusion	Exclusion	Points Redistribution if Exclusion Claimed
Electronic Prescribing	e-Prescribing	5 points	Yes	No internal pharmacy that can accept electronic prescriptions for controlled substances and is not located within 10 miles of any such pharmacy at the start of their EHR reporting period	Points would be redistributed equally among the measures under the Health Information Exchange objective
	Query of Prescription Drug Monitoring Program (PDMP)	5 points	Yes	<ul style="list-style-type: none"> Qualify for the e-Prescribing measure exclusion, excluded from reporting on the Query of PDMP measure. No internal pharmacy that can accept electronic prescriptions for controlled substances and is not located within 10 miles of any such pharmacy at the start of their EHR reporting period Unable to report on the measure in accordance with applicable law 	Points would be redistributed equally among the measures under the Health Information Exchange objective
	<i>Bonus:</i> Verify Opioid Treatment Agreement	Up to 5 points <i>Bonus</i>	No	No exclusion available	N/A
Health Information Exchange	Support Electronic Referral Loops by Sending Health Information	20 points	No	No exclusion available	N/A
	Support Electronic Referral Loops by Receiving and Incorporating Health Information	20 points	No	No exclusion available	N/A
Provider to Patient Exchange	Provide Patients Electronic Access to Their Health Information	40 points	No	No exclusion available	N/A
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	10 points	Yes	Exclusions for each measure: https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Downloads/MedicareEHStage3_Obj6.pdf	<p>If one exclusion claimed, but attest to one measure: 10 points remain for this objective</p> <p>If two exclusions claimed: 10 points redistributed to the Provider to Patient Exchange</p>

Q&A Session

- To ask a question on the phone line:
 - Dial: **1-866-452-7887**
 - If prompted, use passcode: **3179986**
 - Press *1 to be added to the question queue
- As an alternative to spoken questions, you may also submit questions via the chat box.

Medicare PI Program Questions?

Contact the Quality Net help desk at
qnetsupport@hcqis.org or 1 (866) 288-8912