

# Eligible Professional Medicaid EHR Incentive Program Stage 3 Objectives and Measures Objective 8 of 8

Updated: December 2017

Public Health and Clinical Data Registry Reporting	
<b>Objective</b>	The EP is in active engagement with a public health agency or clinical data registry to submit electronic public health data in a meaningful way using certified EHR technology, except where prohibited, and in accordance with applicable law and practice.
<b>Measure Options</b>	<ul style="list-style-type: none"> <li>• <u>Measure 1 - Immunization Registry Reporting</u>: The EP is in active engagement with a public health agency to submit immunization data and receive immunization forecasts and histories from the public health immunization registry/immunization information system (IIS).</li> <li>• <u>Measure 2 – Syndromic Surveillance Reporting</u>: The EP is in active engagement with a public health agency to submit syndromic surveillance data from an urgent care setting.</li> <li>• <u>Measure 3 – Electronic Case Reporting</u>: The EP is in active engagement with a public health agency to submit case reporting of reportable conditions.</li> <li>• <u>Measure 4 – Public Health Registry Reporting</u>: The EP is in active engagement with a public health agency to submit data to public health registries.</li> <li>• <u>Measure 5 – Clinical Data Registry Reporting</u>: The EP is in active engagement to submit data to a clinical data registry.</li> </ul>
<b>Exclusions</b>	<ul style="list-style-type: none"> <li>• <u>Measure 1</u>: Any EP meeting one or more of the following criteria may be excluded from the immunization registry reporting measure if the EP—               <ul style="list-style-type: none"> <li>○ Does not administer any immunizations to any of the populations for which data is collected by their jurisdiction’s immunization registry or immunization information system during the EHR reporting period;</li> <li>○ Operates in a jurisdiction for which no immunization registry or immunization information system is capable of accepting the specific standards required to meet the CEHRT definition at the start of the EHR reporting period; or</li> <li>○ Operates in a jurisdiction where no immunization registry or immunization information system has declared readiness to receive immunization data as of 6 months prior to the start of the EHR reporting period.</li> </ul> </li> <li>• <u>Measure 2</u>: Any EP meeting one or more of the following criteria may be excluded from the syndromic surveillance reporting measure if the EP—               <ul style="list-style-type: none"> <li>○ Is not in a category of providers from which ambulatory syndromic surveillance data is collected by their jurisdiction’s syndromic surveillance system;</li> <li>○ Operates in a jurisdiction for which no public health agency is capable of receiving electronic syndromic surveillance data from EPs in the specific standards required to meet the CEHRT definition at the start of the EHR reporting period; or</li> <li>○ Operates in a jurisdiction where no public health agency has declared readiness to receive syndromic surveillance data from EPs as of 6 months prior to the start of the EHR reporting period.</li> </ul> </li> <li>• <u>Measure 3</u>: Any EP meeting one or more of the following criteria may be excluded from the case reporting measure if the EP—</li> </ul>

- Does not treat or diagnose any reportable diseases for which data is collected by their jurisdiction's reportable disease system during the EHR reporting period;
- Operates in a jurisdiction for which no public health agency is capable of receiving electronic case reporting data in the specific standards required to meet the CEHRT definition at the start of the EHR reporting period; or
- Operates in a jurisdiction where no public health agency has declared readiness to receive electronic case reporting data as of 6 months prior to the start of the EHR reporting period.
- **Measure 4:** Any EP meeting at least one of the following criteria may be excluded from the public health registry reporting measure if the EP—
  - Does not diagnose or directly treat any disease or condition associated with a public health registry in their jurisdiction during the EHR reporting period;
  - Operates in a jurisdiction for which no public health agency is capable of accepting electronic registry transactions in the specific standards required to meet the CEHRT definition at the start of the EHR reporting period; or
  - Operates in a jurisdiction where no public health registry for which the EP is eligible has declared readiness to receive electronic registry transactions as of 6 months prior to the start of the EHR reporting period.
- **Measure 5:** Any EP meeting at least one of the following criteria may be excluded from the clinical data registry reporting measure if the EP—
  - Does not diagnose or directly treat any disease or condition associated with a clinical data registry in their jurisdiction during the EHR reporting period;
  - Operates in a jurisdiction for which no clinical data registry is capable of accepting electronic registry transactions in the specific standards required to meet the CEHRT definition at the start of the EHR reporting period; or
  - Operates in a jurisdiction where no clinical data registry for which the EP is eligible has declared readiness to receive electronic registry transactions as of 6 months prior to the start of the EHR reporting period.

## Table of Contents

- Definition of Terms
- Attestation Requirements
- Additional Information
- Regulatory References
- Certification and Standards Criteria

## Definition of Terms

**Active engagement** means that the provider is in the process of moving towards sending "production data" to a public health agency or clinical data registry, or is sending production data to a public health agency or clinical data registry.

### **Active Engagement Option 1—Completed Registration to Submit Data:**

The EP registered to submit data with the PHA or, where applicable, the CDR to which the information is being submitted; registration was completed within 60 days after the start of the EHR reporting period; and the EP is awaiting an invitation from the PHA or CDR to begin testing and validation. This option allows providers to meet the measure when the PHA or the CDR has limited resources to initiate the

testing and validation process. Providers that have registered in previous years do not need to submit an additional registration to meet this requirement for each EHR reporting period.

**Active Engagement Option 2 - Testing and Validation:** The EP is in the process of testing and validation of the electronic submission of data. Providers must respond to requests from the PHA or, where applicable, the CDR within 30 days; failure to respond twice within an EHR reporting period would result in that provider not meeting the measure.

**Active Engagement Option 3 – Production:** The EP has completed testing and validation of the electronic submission and is electronically submitting production data to the PHA or CDR.

**Production data** refers to data generated through clinical processes involving patient care, and it is used to distinguish between data and “test data” which may be submitted for the purposes of enrolling in and testing electronic data transfers.

## Attestation Requirements

YES/NO/EXCLUSIONS

### MEASURE 1:

- YES/NO: The EP must attest YES to being in active engagement with a public health agency to submit immunization data and receive immunization forecasts and histories from the public health immunization registry/immunization information system (IIS).
- EXCLUSIONS: Any EP meeting one or more of the following criteria may be excluded from the immunization registry reporting measure if the EP—
  - Does not administer any immunizations to any of the populations for which data is collected by their jurisdiction’s immunization registry or immunization information system during the EHR reporting period;
  - Operates in a jurisdiction for which no immunization registry or immunization information system is capable of accepting the specific standards required to meet the CEHRT definition at the start of the EHR reporting period; or
  - Operates in a jurisdiction where no immunization registry or immunization information system has declared readiness to receive immunization data as of 6 months prior to the start of the EHR reporting period.

### MEASURE 2:

- YES/NO: The EP must attest YES to being in active engagement with a public health agency to submit syndromic surveillance data from an urgent care setting.
- EXCLUSIONS: Any EP meeting one or more of the following criteria may be excluded from the syndromic surveillance reporting measure if the EP—
  - Is not in a category of providers from which ambulatory syndromic surveillance data is collected by their jurisdiction’s syndromic surveillance system;
  - Operates in a jurisdiction for which no public health agency is capable of receiving electronic syndromic surveillance data from EPs in the specific standards required to meet the CEHRT definition at the start of the EHR reporting period; or
  - Operates in a jurisdiction where no public health agency has declared readiness to receive syndromic surveillance data from EPs as of 6 months prior to the start of the EHR reporting period.

### MEASURE 3:

- YES/NO: The EP must attest YES to being in active engagement with a public health agency to submit case reporting of reportable conditions.
- EXCLUSIONS: Any EP meeting one or more of the following criteria may be excluded from the case reporting measure if the EP—
  - Does not treat or diagnose any reportable diseases for which data is collected by their jurisdiction's reportable disease system during the EHR reporting period;
  - Operates in a jurisdiction for which no public health agency is capable of receiving electronic case reporting data in the specific standards required to meet the CEHRT definition at the start of the EHR reporting period; or
  - Operates in a jurisdiction where no public health agency has declared readiness to receive electronic case reporting data as of 6 months prior to the start of the EHR reporting period.

### MEASURE 4:

- YES/NO: The EP must attest YES to being in active engagement with a public health agency to submit data to public health registries.
- EXCLUSIONS: Any EP meeting at least one of the following criteria may be excluded from the public health registry reporting measure if the EP—
  - Does not diagnose or directly treat any disease or condition associated with a public health registry in their jurisdiction during the EHR reporting period;
  - Operates in a jurisdiction for which no public health agency is capable of accepting electronic registry transactions in the specific standards required to meet the CEHRT definition at the start of the EHR reporting period; or
  - Operates in a jurisdiction where no public health registry for which the EP is eligible has declared readiness to receive electronic registry transactions as of 6 months prior to the start of the EHR reporting period.

### MEASURE 5:

- YES/NO: The EP must attest YES to being in active engagement to submit data to a clinical data registry.
- EXCLUSIONS: Any EP meeting at least one of the following criteria may be excluded from the clinical data registry reporting measure if the EP—
  - Does not diagnose or directly treat any disease or condition associated with a clinical data registry in their jurisdiction during the EHR reporting period;
  - Operates in a jurisdiction for which no clinical data registry is capable of accepting electronic registry transactions in the specific standards required to meet the CEHRT definition at the start of the EHR reporting period; or
  - Operates in a jurisdiction where no clinical data registry for which the EP is eligible has declared readiness to receive electronic registry transactions as of 6 months prior to the start of the EHR reporting period.

## Additional Information

- To meet all the measures within the public health objective, EPs must use CEHRT and the standards included in the [2015 Edition proposed rule](#). CMS anticipates that as new public health registries and clinical data registries are created, ONC and CMS will work with the public health



community and clinical specialty societies to develop ONC-certified electronic reporting standards for those registries so providers have the option to count participation in those registries under the measures for this objectives.

- EPs must attest to *at least two measures* from the Public Health Reporting Objective, Measures 1 through 5.
- If public health agencies have not declared 6 months before the start of the EHR reporting period whether the registry they are offering will be ready on January 1 of the upcoming year for use by providers seeking to meet EHR reporting periods in that upcoming year, a provider can claim an exclusion.
- An exclusion for a measure does not count toward the total of two measures. Instead, in order to meet this objective, an EP would need to meet two of the total number of measures available to them. If the EP qualifies for multiple exclusions and the remaining number of measures available to the EP is less than three, the EP can meet the objective by meeting all of the remaining measures available to them and claiming the applicable exclusions. Available measures include ones for which the EP does not qualify for an exclusion.
- For Measure 1, provider's health IT system may layer additional information on the immunization history, forecast, and still successfully meet this measure.
- Bi-directionality provides that certified health IT must be able to receive and display a consolidated immunization history and forecast in addition to sending the immunization record.
- For Measure 1, an exclusion does not apply if an entity designated by the immunization registry or immunization information system can receive electronic immunization data submissions. For example, if the immunization registry cannot accept the data directly or in the standards required by CEHRT, but if it has designated a Health Information Exchange to do so on their behalf and the Health Information Exchange is capable of accepting the information in the standards required by CEHRT, the provider could not claim the second exclusion.
- For Measure 2, because syndromic surveillance reporting is more appropriate for urgent care settings and eligible hospitals, we remove this measure for eligible professionals for Stage 3 with the exception of providers who are practicing in urgent care settings.
- For Measure 2, an exclusion does not apply if an entity designated by public health agency can receive electronic syndromic surveillance data submissions. For example, if the public health agency cannot accept the data directly or in the standards required by CEHRT, but if it has designated a Health Information Exchange to do so on their behalf and the Health Information Exchange is capable of accepting the information in the standards required by CEHRT, the provider could not claim the second exclusion.
- Measure 3, Electronic Case Reporting is not required until 2018, since we believe that the standards will be mature and that jurisdictions will be able to accept these types of data by that time.
- For Measure 4, EPs may choose to report to more than one public health registry to meet the number of measures required to meet the objective.
- For Measure 4, a provider may count a specialized registry (such as prescription drug monitoring) if the provider achieved the phase of active engagement defined under Active Engagement Option 3: Production, including production data submission with the specialized registry in a prior year under the applicable requirements of the EHR Incentive Programs in 2015 through 2017.
- For Measure 5, EPs may choose to report to more than one clinical data registry to meet the number of measures required to meet the objective



- For Measure 5, the definition of jurisdiction is general, and the scope may be local, state, regional or at the national level. The definition will be dependent on the type of registry to which the provider is reporting. A registry that is “borderless” would be considered a registry at the national level and would be included for purposes of this measure.
- Providers who have previously registered, tested, or begun ongoing submission of data to registry do not need to “restart” the process beginning at active engagement option 1. The provider may simply attest to the active engagement option which most closely reflects their current status.
- In determining whether an EP meets the first exclusion, the registries in question are those sponsored by the public health agencies with jurisdiction over the area where the EP practices and national medical societies covering the EP’s scope of practice. Therefore an EP must complete two actions in order to determine available registries or claim an exclusion:
  - Determine if the jurisdiction (state, territory, etc.) endorses or sponsors a registry; and,
  - Determine if a National Specialty Society or other specialty society with which the provider is affiliated endorses or sponsors a registry.
- If a provider is part of a group which submits data to a registry, but the provider does not contribute to that data (for example they do not administer immunizations), the provider should not attest to meeting the measure but instead should select the exclusion. The provider may then select a different more relevant measure to meet.
- If a provider does the action that results in a data element for a registry in the normal course of their practice and is in active engagement to submit to a registry, but simply has no cases for the reporting period, the provider is not required to take the exclusion and may attest to meeting the measure.
- CMS is developing a centralized repository for public health agency (PHA) and clinical data registry (CDR) reporting. The repository is expected to be completed in early 2017. All collected data will be posted on the EHR Incentive Programs website, and CMS will notify subscribers after the information is available.

## Regulatory References

- This objective may be found in Section 42 of the code of the federal register at 495.24 (d)(8)(i)(A) and (B). For further discussion please see [80 FR 62870](#).
- In order to meet this objective and measure, an EP must use the capabilities and standards of CEHRT at 45 CFR 170.315 (f)(1), (f)(2), (f)(4), (f)(5), (f)(6) and (f)(7).

## Certification and Standards Criteria

Below is the corresponding certification and standards criteria for electronic health record technology that supports achieving the meaningful use of this objective.

Certification Criteria	
<b>§ 170.314(f)(1) Public Health – Transmission to Immunization Registries</b>	(i) Create immunization information for electronic transmission in accordance with:  (A) The standard and applicable implementation specifications specified in §170.205(e)(4). (B) At a minimum, the version of the standard specified in §170.207(e)(3) for historical vaccines.

	<p>(C) At a minimum, the version of the standard specified in §170.207(e)(4) for administered vaccines.</p> <p>(ii) Enable a user to request, access, and display a patient's evaluated immunization history and the immunization forecast from an immunization registry in accordance with the standard at §170.205(e)(4).</p>
<p><b>§ 170.315(f)(2)</b> Transmission to public health registries—syndromic surveillance</p>	<p>(i) Create syndrome-based public health surveillance information for electronic transmission in accordance with the standard (and applicable implementation specifications) specified in §170.205(d)(4).</p>
<p><b>§ 170.315(f)(5)</b> Transmission to public health agencies—electronic case reporting</p>	<p>(i) Consume and maintain a table of trigger codes to determine which encounters may be reportable.</p> <p>(ii) Match a patient visit or encounter to the trigger code based on the parameters of the trigger code table.</p> <p>(iii) Case report creation. Create a case report for electronic transmission:</p> <p>(A) Based on a matched trigger from paragraph (f)(5)(ii).</p> <p>(B) That includes, at a minimum:</p> <p>(1) The Common Clinical Data Set.</p> <p>(2) Encounter diagnoses. Formatted according to at least one of the following standards:</p> <p>(i) The standard specified in §170.207(i).</p> <p>(ii) At a minimum, the version of the standard specified in §170.207(a)(4).</p> <p>(3) The provider's name, office contact information, and reason for visit.</p> <p>(4) An identifier representing the row and version of the trigger table that triggered the case report.</p>
<p><b>§ 170.315(f)(6)</b> Transmission to public health agencies—antimicrobial use and resistance reporting.</p>	<p>Create antimicrobial use and resistance reporting information for electronic transmission in accordance with the standard specified in §170.205(r)(1).</p>
<p><b>§ 170.315(f)(7)</b> Transmission to public health agencies—health care surveys</p>	<p>Create health care survey information for electronic transmission in accordance with the standard specified in §170.205(s)(1).</p>

Standards Criteria	
§ 170.205(e)(3) Electronic submission to immunization registries.	HL7 2.5.1 (incorporated by reference in §170.299). Implementation specifications. HL7 2.5.1 Implementation Guide for Immunization Messaging, Release 1.4, (incorporated by reference in §170.299).
§ 170.207(e)(4) Electronic submission to immunization registries.	HL7 2.5.1 (incorporated by reference in §170.299). Implementation specifications. HL7 2.5.1 Implementation Guide for Immunization Messaging, Release 1.5 (incorporated by reference in §170.299) and HL7 Version 2.5.1 Implementation Guide for Immunization Messaging (Release 1.5)—Addendum, July 2015 (incorporated by reference in §170.299).
§ 170.205(d)(2) Electronic submission to public health agencies for surveillance or reporting	HL7 2.5.1 (incorporated by reference in §170.299).
§ 170.205(d)(3) Electronic submission to public health agencies for surveillance or reporting	Standard. HL7 2.5.1 (incorporated by reference in §170.299). Implementation specifications. PHIN Messaging Guide for Syndromic Surveillance (incorporated by reference in §170.299) and Conformance Clarification for EHR Certification of Electronic Syndromic Surveillance, Addendum to PHIN Messaging Guide for Syndromic Surveillance (incorporated by reference in §170.299).
§ 170.205(d)(4) Electronic submission to public health agencies for surveillance or reporting	Standard. HL7 2.5.1 (incorporated by reference in §170.299). Implementation specifications. PHIN Messaging Guide for Syndromic Surveillance: Emergency Department, Urgent Care, Inpatient and Ambulatory Care Settings, Release 2.0, April 21, 2015 (incorporated by reference in §170.299) and Erratum to the CDC PHIN 2.0 Implementation Guide, August 2015; Erratum to the CDC PHIN 2.0 Messaging Guide, April 2015 Release for Syndromic Surveillance: Emergency Department, Urgent Care, Inpatient and Ambulatory Care Settings (incorporated by reference in §170.299).

*Additional standards criteria may apply. Review the [ONC 2015 Edition Final Rule](#) for more information.*