

Medicare Promoting Interoperability PROGRAM

Medicare Promoting Interoperability Program Frequently Asked Questions (FAQs)



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General

1. ***Who is required to participate in the Medicare Promoting Interoperability Program?***

The program is open to eligible hospitals and critical access hospitals (CAHs) that receive federal funds from Medicare. Those who are eligible but do not participate are subject to a downward payment adjustment.

2. ***What are the requirements for successfully reporting data for the Medicare Promoting Interoperability Program?***

To be considered a Meaningful User in the program, eligible hospitals and CAHs must:

- Use the appropriate edition of Certified Electronic Health Record Technology (CEHRT),
- Attest to the required objectives and their measures for the required EHR reporting period,
- Satisfy the minimum score requirement,
- Report on the required number of Electronic Clinical Quality Measures (eCQM), and
- Attest to the following:
 - The annual self-assessment of the SAFER Guides measure, with a “yes/no” attestation;
 - The Security Risk Analysis measure;
 - Office of the National Coordinator (ONC) Direct Review Attestation; and
 - The Actions to limit or restrict the compatibility or interoperability of CEHRT attestation.

3. ***How does the Medicare Promoting Interoperability Program differ from the Medicare and Medicaid EHR Incentive Programs?***

The EHR Incentive Programs were introduced in 2011 as part of the Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009. The programs encouraged eligible professionals (EPs), eligible hospitals, Medicare Advantage (MA) hospitals, and CAHs to adopt, implement, and upgrade (AIU) certified electronic health record technology (CEHRT) to demonstrate meaningful use of health information technology (health IT).

Starting in 2018, for a greater focus on interoperability and improving patient access to health information, the programs were renamed to the Medicare & Medicaid Promoting Interoperability Programs and the program requirements were overhauled to align to this new focus.

In 2022, CMS discontinued the Medicaid Promoting Interoperability Program leaving the Medicare Promoting Interoperability Program as the only active program for eligible hospitals and CAHs. Eligible clinicians that previously participated in the Medicare & Medicaid EHR Incentive Programs are now required to participate in the Merit-based Incentive Payment System's (MIPS) Promoting Interoperability Performance Category.

Objectives and Measures

4. *What are the required objectives and measures under the Medicare Promoting Interoperability Program?*

Eligible hospitals and CAHs are required to report on measures from each of the program's four scored objectives:

Electronic Prescribing	Health Information Exchange
Provider to Patient Exchange	Public Health & Clinical Data Exchange

For additional information on the program's objectives and measures, please refer to the [2023 Medicare Promoting Interoperability Program Specification Sheets](#).

5. *Are there bonus measures?*

For CY 2023 EHR reporting period, the following measures are considered bonus measures:

- Reporting on the Public Health Registry Reporting Measure, the Clinical Data Registry Reporting Measure, or both – 5 bonus points are awarded for reporting on one or both measures

6. *What is the Enabling Exchange Under TEFCA Measure?*

The Enabling Exchange Under the Trusted Exchange Framework and Common Agreement (TEFCA) measure was adopted in the Medicare Promoting Interoperability Program beginning with the CY 2023 EHR reporting period. Under this measure, a hospital or CAH must attest to participating as a signatory to a framework agreement. They must also attest to enabling secure, bi-directional exchange of information to occur, in production for all unique patients discharged from the eligible hospital or CAH inpatient or emergency department (place of service [POS] 21 or 23) and all unique patient records stored or maintained in the EHR for these departments, during the EHR reporting period in accordance with applicable law and policy. Last, they attest to using the functions of CEHRT to support the bi-directional exchange of patient information, in production, under this

framework agreement. This measure is worth up to 30 points.

If attesting to this OR the Bi-Directional Exchange through HIE measure, participants are no longer required to attest on the two other HIE measures - Support Electronic Referral Loops by Sending Health Information and Support Electronic Referral Loops by Receiving and Incorporating Health Information to meet the requirements of the Health Information Exchange objective.

Support Electronic Referral Loops by Sending Health Information (15 points)	Support Electronic Referral Loops by Receiving and Reconciling Health Information (15 points)	OR	Bi-Directional Exchange through Health Information Exchange (30 points)	OR	Enabling Exchange Under TEFCA (30 points)
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1. *Which measures under the Public Health and Clinical Data Exchange objective are required?*

For CY 2023 EHR reporting period, we require reporting on four of the Public Health and Clinical Data Exchange Objective measures that are worth up to 25 total points. All four measures are “yes/no” attestations.

- Syndromic Surveillance Reporting,
- Immunization Registry Reporting,
- Electronic Case Reporting, and
- Electronic Reportable Laboratory Result Reporting.

As a reminder, the Public Health Registry Reporting and Clinical Data Registry Reporting measures are optional. Reporting on one or both options are available for a total of **5 bonus points**.

7. *What if we cannot attest to every required measure?*

Each measure contributes towards your total Medicare Promoting Interoperability Program score. Eligible hospitals or CAHs that submit less than a 1 in the numerator or report a “no” for a required measure or attestation will not earn a score. These hospitals or CAHs will not be considered meaningful EHR users and will be subject to a downward payment adjustment.

SAFER Guides

8. *What are the SAFER Guides?*

As part of the [Fiscal Year \(FY\) 2023 Medicare Hospital Inpatient Prospective Payment System for Acute Care Hospitals and Long-term Care Hospital Prospective Payment System Final Rule](#), CMS continues to require the Safety Assurance Factors for EHR Resilience (SAFER) Guides measure to further support the Medicare Promoting Interoperability Program’s goals of improved EHR use and health care quality.

As part of the CY 2023 EHR reporting period, participants are required to attest whether they have completed a self-assessment on all [9 SAFER Guides](#) at any point during the calendar year. An attestation of “yes” or “no” is acceptable and will not affect the total score or status.

For more information, please reference the [CMS Safety Assurance Factors for EHR Resilience SAFER Guides infographic](#).

9. *What does attesting “Yes” or “No” to the SAFER Guides indicate?*

Attesting “yes” indicates that a hospital conducted an annual self-assessment of all 9 SAFER guides. Attesting “no” signifies that a hospital did not complete a self-assessment of all 9 SAFER guides.

10. *Are the SAFER Guides separate from the Security Risk Analysis measure?*

Yes, the SAFER Guides measure is separate from the Security Risk Analysis measure.

For the Security Risk Analysis measure, participants must conduct or review a security risk analysis of their CEHRT and address the encryption/security of data, implement updates as necessary, and then submit a “yes/no” attestation of completion. A “yes” response is required to fulfill the measure.

Attestation to both the SAFER Guides measure and the Security Risk Analysis measure on an annual basis are required to successfully meet the program requirements each year.

11. *Where are the SAFER Guides located?*

All of the SAFER Guides can be found on the Office of the National Coordinator for Health Information Technology (ONC) [website](#).

Certified Electronic Health Record Technology (CEHRT)

12. *What is CEHRT and why do I have to use CEHRT?*

To efficiently capture and share patient data, health care providers need certified electronic health record (EHR) technology (CEHRT) that stores data in a structured format. Structured data allow health care providers to easily retrieve and transfer patient information and use the EHR in ways that can aid patient care.

13. *What are the CEHRT requirements?*

For CY 2023 EHR reporting period, in order to be considered a meaningful user and avoid a downward payment adjustment, eligible hospitals and CAHs will be **required** to use CEHRT that has been updated to meet [2015 Edition Cures Update](#) criteria.

In some situations, the product may be deployed during the EHR reporting period but pending certification. In such cases, the product must be updated to the 2015 Edition Cures Update criteria by the last day of the EHR reporting period.

Eligible hospitals and CAHs must provide their EHR's CMS Identification code from the [Certified Health IT Product List \(CHPL\)](#), available on HealthIT.gov, when submitting their data.

14. *When do I need to be using my CEHRT?*

A hospital's CEHRT functionality must be in place by the first day of the hospital's chosen EHR reporting period but must be certified by the last day of the EHR reporting period. Eligible hospitals or CAHs must be using their selected version's functionality for the full EHR reporting period (90 days).

Electronic Clinical Quality Measures (eCQM) Reporting

15. *What are eCQMs?*

Electronic clinical quality measures (eCQMs) use data electronically extracted from EHRs and/or health information technology systems to measure the quality of health care services that are provided.

There are several benefits of using eCQMs:

- eCQMs use clinical data to assess the outcomes of treatment by measured entities.
- eCQMs reduce the burden of manual abstraction and reporting for measured entities.
- eCQMs foster the goal of access to real-time data for point of care quality improvement and clinical decision support.

CMS requires that Medicare Promoting Interoperability Program participants report on eCQMs.

16. *How many eCQMs are required to be reported? What is the reporting period?*

For CY 2023 EHR reporting period, eligible hospitals and CAHs are required to report on at least three eCQMs, plus the Safe Use of Opioids – Concurrent Prescribing measure, for a total of four eCQMs.

Beginning with the calendar year (CY) 2023 eCQM reporting period, hospitals are required to submit a full year worth of data.

Scoring Methodology

17. *What score does a hospital need to be considered a successful participant?*

Eligible hospitals and CAHs participating in the Medicare Promoting Interoperability Program must score a minimum of the total required points as specified by CMS to satisfy the scoring requirement and successfully attest.

For the CY 2023 EHR reporting period, participants must score a minimum of 60 out of a possible 100 points.

18. How are final scores calculated?

CMS adds the scores for each of the individual measures together to calculate the total score of up to 100 possible points for each eligible hospital or CAH.

19. What if my final score is under the required amount of points?

Eligible hospitals or CAHs scoring below the required minimum points will not be considered meaningful EHR users and could be subject to a downward payment adjustment.

20. When and how will I be informed of my score?

A hospital or CAH will learn their final Promoting Interoperability score after submitting their required attestation, objective, and measure data into the Hospital Quality Reporting (HQR) [system](#). Once the data has been successfully submitted, the user can then see their submitted data, individual scoring, and overall score achieved by viewing the data form. There is also the option to download a PDF report containing all submitted data, which can serve as documentation of successful reporting. This can be done by selecting the blue “Export Data” button on the right-hand side of the screen.

Hospitals and their vendors should report their data in the HQR system early enough before the reporting deadline to review their submission report and make any corrections before the deadline. Once the deadline passes, no corrections to the data can be made. Eligible hospitals and CAHs will be notified via a physical letter in mid-September if they’re subject to a downward payment adjustment. At that time, they’ll be given an additional chance to submit a Hardship Reconsideration Application.

Attestation

21. How do we attest for each reporting year?

Eligible hospitals and CAHs must submit their attestation through the HQR system, ensuring they’ve met all the program requirements for the EHR reporting period, and their eCQMs for the required reporting period. Participants have until February 28th (*note: this date is subject to change due to weekends and/or federal holidays*) of each year to attest for the previous year.

22. Where can we find help with attesting?

If you need help with attesting or have questions, you can contact the CCSQ Help Desk (*previously the QualityNet Help Desk*) for assistance at 1 (866) 288-8912 or gnetsupport@cms.hhs.gov.

Hardship Exception

23. Who is eligible for a hardship exception?

To be considered for an exception (to avoid a downward payment adjustment), eligible hospitals

and CAHs must complete and submit a hardship exception application. If approved, the hardship exception is valid for only one payment adjustment year. By law, eligible hospitals and CAHs are limited to 5 years of hardship exceptions.

Eligible hospitals and CAHs may submit a Medicare Promoting Interoperability Program hardship exception application citing one of the following specified reasons for review and approval:

- Using decertified EHR technology
- Insufficient internet connectivity
- Extreme and uncontrollable circumstances

24. *How can we obtain a hardship exception?*

We now have gone paperless for the Medicare Promoting Interoperability Program hardship exception applications. Applications may only be submitted during the hardship application period (appx. May – September). Applications are subject to annual renewal. Please reference the Promoting Interoperability Program [Scoring, Payment Adjustment, and Hardship Information webpage](#) for updates on the status of applications and where to submit.

If an electronic submission is not possible, you may contact the CCSQ Service Desk and work with a representative to verbally apply at 1 (866) 288-8912.