

MEDICARE PROMOTING INTEROPERABILITY PROGRAM ELIGIBLE HOSPITALS, CRITICAL ACCESS HOSPITALS, AND DUAL-ELIGIBLE HOSPITALS ATTESTING TO CMS OBJECTIVES AND MEASURES FOR 2019

The following information is for eligible hospitals, critical access hospitals (CAHs), and dual-eligible hospitals attesting to CMS for their participation in the Medicare Promoting Interoperability Program in 2019. Those attesting to their state should refer to the [2019 Promoting Interoperability Medicaid specification sheets](#).

Objective Name	Health Information Exchange
Measure	Support Electronic Referral Loops by Sending Health Information 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 certified electronic health record technology (CEHRT); and (2) electronically exchanges the summary of care record.

Definition of Terms

Transition of Care: The movement of a patient from one setting of care (hospital, ambulatory primary care practice, ambulatory specialty care practice, long-term care, home health, rehabilitation facility) to another. At a minimum, this includes all discharges from the inpatient department and after admissions to the emergency department when follow-up care is ordered by an authorized provider of the hospital.

Reporting Requirements

- **DENOMINATOR:** Number of transitions of care and referrals during the electronic health record (EHR) reporting period for which the eligible hospital or CAH inpatient or emergency department (POS 21 or 23) was the transitioning or referring provider.
- **NUMERATOR:** Number of transitions of care and referrals in the denominator where a summary of care record was created and exchanged electronically using CEHRT.
- The EHR reporting period in 2019 for new and returning participants attesting to CMS is a minimum of any continuous 90-day period within the calendar year.



Scoring Information

- Total points available: 20 points.
- 100 total points will be available for the Medicare Promoting Interoperability Program.
- In order to earn a score greater than zero, an eligible hospital or CAH must complete the activities required by the Security Risk Analysis measure and submit their complete numerator and denominator or yes/no data for all required measures.
- *Rounding*: When calculating the performance rates and measure and objective scores, we stated that we would generally round to the nearest whole number. Scores under 50 points would not be considered meaningful users.

Additional Information

- Beginning with program year 2019, eligible hospitals and CAHs must use 2015 Edition CEHRT. The 2015 Edition functionality must be in place by the first day of the EHR reporting period and the product must be certified to the 2015 Edition criteria by the last day of the EHR reporting period. The eligible hospital or CAH must be using the 2015 Edition functionality for the full EHR reporting period. In many situations the product may be deployed, pending certification.
- Patients whose records are maintained using CEHRT must be included in the denominator for transitions of care.
- The action must occur within the EHR reporting period if that period is a full calendar year, or if it is less than a full calendar year, within the calendar year in which the EHR reporting period occurs (between January 1st and December 31st).
- The referring provider must have reasonable certainty of receipt by the receiving provider to count the action toward the measure. This may include confirmation of receipt or that a query of the summary of care record has occurred in order to count the action in the numerator.
- Apart from the three fields noted as required for the summary of care record (i.e., current problem list, current medication list, and current medication allergy list), in circumstances where there is no information available to populate one or more of the fields listed either because the eligible hospital/CAH does not record such information or because there is no information to record, the eligible hospital/CAH may leave the field(s) blank and still meet the objective and its associated measure.
- An eligible hospital or CAH must have the ability to transmit all data pertaining to laboratory test results in the summary of care document, but may work with their system developer to establish clinically relevant parameters for the most appropriate results for the given transition or referral.

- An eligible hospital or CAH who limits the transmission of laboratory test result data in a summary of care document must send the full results upon request (i.e. all lab results as opposed to a subset).
- The exchange must comply with the privacy and security protocols for electronic protected health information under the Health Insurance Portability and Accountability Act (HIPAA).
- In cases where the eligible hospitals or CAHs share access to an EHR, a transition or referral may still count toward the measure if the referring provider creates the summary of care document using CEHRT and sends the summary of care document electronically. If a provider chooses to include such transitions to providers where access to the EHR is shared, they must do so universally for all patient and all transitions or referrals.
- For Stage 3, we are not continuing the policy of allowing a third party to convert the summary of care record transmission to fax as it does not drive toward the overall goal of sending, receiving, or retrieving an electronic summary of care document for this objective. Therefore, if the sending provider converts the file to a format the receiving provider could not electronically receive and incorporates it as a consolidated clinical document architecture (C-CDA), the initiating provider may not count the transition in their numerator (80 FR 62859).
- The initiating eligible hospital or CAH must send a C-CDA document that the receiving provider would be capable of electronically incorporating as a C-CDA on the receiving end. For Stage 3, we are not continuing the policy of allowing a third party to convert the summary of care record transmission to fax as it does not drive toward the overall goal of sending, receiving or retrieving an electronic summary of care document for this objective. Therefore, if the sending provider converts the file to a format the receiving provider could not electronically receive and incorporate as a C-CDA, the initiating provider may not count the transition in their numerator (80 FR 62859).
- A record cannot be considered incorporated if it is discarded without the reconciliation of clinical information or if it is stored in a manner that is not accessible for provider use within the EHR.
- Non-medical staff may conduct reconciliation under the direction of the eligible hospital or CAH, so long as the provider or other credentialed medical staff is responsible and accountable for review of the information and for the assessment of and action on any relevant clinical decisions support (CDS) mechanism.

Regulatory References

- This objective may be found in Section 42 of the code of the federal register at 495.24 (e)(6)(i). For further discussion, please see [83 FR 41634 through 41677](#).
- In order to meet this measure, an eligible hospital or CAH must use the capabilities and standards of CEHRT at 45 CFR 170.315(b)(1).

Certification Criteria and Standards

Below is the corresponding certification criteria and standards for EHR technology that supports this measure.

Certification Criteria

Information about certification for 2015 Edition CEHRT can be found at:

[§170.315 \(b\)\(1\) Transitions of care](#)

Certification Standards

Standards for 2015 Edition CEHRT can be found at the ONC's 2015 Standards Hub:

<https://www.healthit.gov/topic/certification/2015-standards-hub>