

Modified Stage 2 Meaningful Use: Objective #10 – Public Health Reporting Massachusetts Medicaid EHR Incentive Payment Program

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The attestation deadline for
Program Year 2015 is
August 14, 2016

- What is Meaningful Use (MU) Objective #10 all about?
- Steps to meet MU Objective #10
 1. Do the right thing:
Establish “Active Engagement” with a public health agency
 - Active Engagement Option 1
 - Active Engagement Option 2
 - Active Engagement Option 3
 2. Generate supporting documentation
 3. Retain supporting documentation
- Attesting for MU Objective #10
- Common Issues
- Questions and Answers

What is MU Objective #10 all about?

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What is MU Objective #10 all about?

Public Health Reporting	
Objective	The Eligible Professional (EP) is in active engagement with a public health agency to submit electronic public health data from CEHRT except where prohibited and in accordance with applicable law and practice.
Measure Options	<ul style="list-style-type: none">• Measure 1 - Immunization Registry Reporting: The EP is in active engagement with a public health agency to submit immunization data.• Measure 2 – Syndromic Surveillance Reporting: The EP is in active engagement with a public health agency to submit syndromic surveillance data.• Measure 3 – Specialized Registry Reporting: The EP is in active engagement to submit data to a specialized registry.
Alternate Exclusions	<p><u>Alternate Exclusions</u></p> <p>EPs scheduled to be in Stage 1: Must attest to at least 1 measure from the Public Health Reporting Objective Measures 1-3.</p> <ul style="list-style-type: none">• May claim an Alternate Exclusion for Measure 1, Measure 2, or Measure 3.• An Alternate Exclusion may only be claimed for up to two measures, then the provider must either attest to or meet the exclusion requirements for the remaining measure described in 495.22 (e)(10)(i). <p>EPs scheduled to be in Stage 2: Must attest to at least 2 measures from the Public Health Reporting Objective Measures 1-3.</p> <ul style="list-style-type: none">• May claim an alternate exclusion for Measure 2 or Measure 3 (Syndromic Surveillance Measure or Specialized Registry Reporting Measure) or both.

What is MU Objective #10 all about? (continued)

Public Health Reporting

Exclusions

Measure 1 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 its 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 from the EP at the start of the EHR reporting period.

Measure 2 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 at the start of the EHR reporting period.

Measure 3 Exclusions: Any EP meeting at least one of the following criteria may be excluded from the specialized registry reporting measure if the EP

- Does not diagnose or treat any disease or condition associated with, or collect relevant data that is collected by, a specialized registry in their jurisdiction during the EHR reporting period
- Operates in a jurisdiction for which no specialized 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 specialized registry for which the EP is eligible has declared readiness to receive electronic registry transactions at the beginning of the EHR reporting period.

What is MU Objective #10 all about?

Public Health Reporting - Attestation Requirements

- **MEASURE 1:** The EP must attest YES to being in active engagement with a public health agency to submit immunization data.
- **EXCLUSIONS:** EPs meeting one or more of the following criteria may be excluded:
 - Does not administer any immunizations to any of the populations for which data is collected by its jurisdiction's immunization registry during the EHR reporting period;
 - Operates in a jurisdiction for which no immunization registry 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 has declared readiness to receive immunization data from the EP at the start of the EHR reporting period.

What is MU Objective #10 all about?

Public Health Reporting - Attestation Requirements

- **MEASURE 2:** The EP must attest YES to being in active engagement with a public health agency to submit syndromic surveillance data.
- **EXCLUSIONS:** EPs meeting one or more of the following criteria may be excluded:
 - 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 at the start of the EHR reporting period.

What is MU Objective #10 all about?

Public Health Reporting - Attestation Requirements

- MEASURE 3: The EP must attest YES to being in active engagement to submit data to a specialized registry.
- EXCLUSIONS: EPs meeting one or more of the following criteria may be excluded:
 - Does not diagnose or treat any disease or condition associated with, or collect relevant data that is collected by, a specialized registry in their jurisdiction during the EHR reporting period;
 - Operates in a jurisdiction for which no specialized 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 specialized registry for which the EP is eligible has declared readiness to receive electronic registry transactions at the beginning of the EHR reporting period.

What is MU Objective #10 all about?

Public Health Reporting - Attestation Requirements

ALTERNATE EXCLUSIONS:

- EPs scheduled to be in Stage 1 must attest to at least 1 measure from the Public Health Reporting Objective.
 - May claim an Alternate Exclusion for Measure 1, Measure 2, or Measure 3.
 - An Alternate Exclusion may only be claimed for up to two measures, then the provider must either attest to or meet the standard exclusion requirements for the remaining measure described in 495.22 (e)(10)(i)(C).
- EPs scheduled to be in Stage 2 must attest to at least 2 measures from the Public Health Reporting Objective.
 - May claim an Alternate Exclusion for Measure 2 or Measure 3 (Syndromic Surveillance or Specialized Registry).

What is MU Objective #10 all about?

Public Health Reporting – Additional Information

- Providers who engaged in activity to meet Stage 1 or Stage 2 public health reporting objectives may count those actions toward meeting the equivalent Modified Stage 2 “active engagement” option.
 - Providers who had previously registered, tested, or begun ongoing submission of data to a registry do not need to “restart” the process.
- Providers scheduled to attest to Stage 1 in 2015 must report at least one measure, unless they qualify for exclusions from all 3 measures.
- For Stage 2 providers, simply claiming 2 exclusions is not an acceptable way to meet the objective.
 - If the EP qualifies for 2 exclusions, the EP should meet the objective by meeting the 1 remaining measure. If the EP qualifies for 3 exclusions, the EP can meet the objective by claiming exclusions for all three measures.

What is MU Objective #10 all about?

Public Health Reporting – Additional Information

- If a provider is part of a group which submits data to a registry, but the provider does not contribute to that data (e.g., they do not administer immunizations), the provider should not attest to meeting the measure, but instead should claim the exclusion.
- A provider may report to more than one specialized registry and may count specialized registry reporting more than once to meet the objective.

Steps to meet MU Objective #10



1. Do the right thing

Establish “active engagement” with a public health agency to submit electronic public health data.

“Active engagement” means that the provider is either:

- in the process of moving towards sending production data to a public health agency or clinical data registry, or
- sending production data to a public health agency or clinical data registry.

“Production data” refers to data generated through clinical processes involving patient care (different from test data submitted for the purposes of enrolling in and testing electronic data transfers).

Active Engagement Option 1 – Completed Registration:

- The EP is registered to submit data with the Public Health Agency (PHA) or Clinical Data Registry (CDR);
- 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 CDR has limited resources to initiate the testing and validation process.

Providers who 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 CDR within 30 days; failure to respond twice within the EHR reporting period would result in failure to meet the measure.

Active Engagement Option 3 – Production:

The EP has completed testing and validation of electronic submission and is actively submitting production data to the PHA or CDR.

2. Generate supporting documentation

■ Measure 1: Immunization Registry

All EPs, except for those claiming an exclusion, are required to upload their Massachusetts Immunization Information System (MIIS) scorecard or Registration of Intent receipt from the Department of Public Health (DPH).

- *Primary care physicians who claim an exclusion are required to submit a letter on letterhead, signed by the EP, attesting to accuracy of the exclusion.*

■ Measure 2: Syndromic Surveillance

Massachusetts Department of Public Health (DPH) does not accept Syndromic Surveillance Data from Providers at this time. Therefore, all Massachusetts-based EPs can claim an exclusion.

■ Measure 3: Specialized Registry

Documentation from a Specialized Registry to demonstrate active engagement.

3. Retain supporting documentation

- Attestation purposes vs. audit purposes

Attesting for MU Objective #10

Attesting for MU Objective #10

Option 1 – Immunization Registry

(*) Red asterisk indicates a required field.

Objective: The EP is in active engagement with an immunization registry or immunization information systems to submit electronic public health data from CEHRT except where prohibited and in accordance with applicable law and practice.

Measure: Option 1 - Immunization Registry Reporting: The EP is in active engagement with a public health agency to submit immunization data.

*Does this option apply to you?

Yes No

Active Engagement Options: If you have answered 'Yes' above, please select one of the options listed below.

Completed registration to submit data

Testing and validation

Production

EXCLUSION: If Option 1 is 'No', then select one of the Exclusions below. Any EP that meets one of the following criteria may be excluded from this objective.

Does not administer any immunizations to any of the populations for which data is collected by its jurisdiction's immunization registry or immunization information system during the EHR reporting period.

Yes No

Operates in a jurisdiction where no immunization registry or immunization information system has declared readiness to receive immunization data from the EP at the start of the EHR reporting period.

Yes No

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.

Yes No

Attesting for MU Objective #10

Option 2 – Syndromic Surveillance

(*) Red asterisk indicates a required field.

Objective: The EP is in active engagement with a syndromic surveillance registry to submit electronic public health data from CEHRT except where prohibited and in accordance with applicable law and practice.

Measure: Option 2 - Syndromic Surveillance Reporting: The EP is in active engagement with a public health agency to submit syndromic surveillance data.

*Does this option apply to you?

Yes No

Active Engagement Options: If you have answered 'Yes' above, please select one of the options listed below.

Completed registration to submit data

Testing and validation

Production

EXCLUSION: If Option 2 is 'No', then select one of the Exclusions below. Any EP that meets one of the following criteria may be excluded from this objective.

Is not in a category of providers from which ambulatory syndromic surveillance data is collected by their jurisdiction's syndromic surveillance system.

Yes No

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.

Yes No

Operates in a jurisdiction where no public health agency has declared readiness to receive syndromic surveillance data from EPs at the start of the EHR reporting period.

Yes No

The EP did not plan to report on syndromic surveillance data, therefore the EP is able to claim an exclusion.

Yes No

Attesting for MU Objective #10

Option 3a – Specialized Registry

(*) Red asterisk indicates a required field.

Objective: The EP is in active engagement with a specialized registry to submit electronic public health data from CEHRT except where prohibited and in accordance with applicable law and practice.

Measure: Option 3 - Specialized Registry Reporting: The EP is in active engagement to submit data to a specialized registry.

*Does this option apply to you?

Yes No

If 'Yes', enter the name of the specialized registry used below.

Active Engagement Options: If you have answered 'Yes' above, please select one of the options listed below.

- Completed registration to submit data
- Testing and validation
- Production

EXCLUSION: If Option 3 is 'No', then select one of the Exclusions below. Any EP that meets one of the following criteria may be excluded from this objective.

Does not diagnose or treat any disease or condition associated with, or collect relevant data that is collected by, a specialized registry in their jurisdiction during the EHR reporting period.

Yes No

Operates in a jurisdiction for which no specialized 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.

Yes No

Operates in a jurisdiction where no specialized registry for which the EP is eligible has declared readiness to receive electronic registry transactions at the beginning of the EHR reporting period.

Yes No

The EP did not plan to report on special registry data, therefore the EP is able to claim an exclusion.

Yes No

Attesting for MU Objective #10

Option 3b – Specialized Registry

(*) Red asterisk indicates a required field.

Objective: The EP is in active engagement with a specialized registry to submit electronic public health data from CEHRT except where prohibited and in accordance with applicable law and practice.

Measure: Option 3 - Specialized Registry Reporting: The EP is in active engagement to submit data to a specialized registry.

*Enter the name of the specialized registry used below.

***Active Engagement Options:** Select one of the options listed below.

- Completed registration to submit data
- Testing and validation
- Production

Previous

Reset

Save & Continue

Common Issues

Common Issues: Objective #10



Common Issues: Objective #10

- Claiming exclusions
 - Understanding “standard” exclusions vs. Alternate Exclusions
- For Active Engagement Option 1 (Completed Registration), registration must be completed within the first 60 days of the EHR reporting period
- Specialized Registries – can be PHA or CDR

Questions?

- [CMS 2015 Program Requirements page](#)
- [MeHI Medicaid EHR Incentive Program page](#)
- [MeHI 2015 Supporting Documentation Guide](#)
- [Massachusetts Immunization Information System \(MIIS\) Resource Center – Meaningful Use](#)
- [Massachusetts Department of Public Health \(DPH\) – Meaningful Use and Public Health Objectives](#)

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