

Strategies for Patient Electronic Access and Health Information Exchange

Using Opt Out and Query HIE for MU Stage 3

Massachusetts Medicaid EHR Incentive Program

June 11, 2019

Today's presenters: Margaret Lellman Thomas Bennett



Disclaimer

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The attestation deadline for Program Year 2019 is March 31, 2020



Reminders: 2015 Edition CEHRT

- 2015 Edition CEHRT functionality is required to meet Stage 3 requirements
- The 2015 Edition CEHRT must be installed and used for the entirety of the EP's selected 90-day EHR reporting period



- If your EPs have not yet upgraded, start the process ASAP
 - If EPs don't upgrade to the 2015 CEHRT Edition before October 3rd, they won't be able to attest to Program Year 2019



Agenda

- Purpose of This Webinar
- MU Objective: Patient Electronic Access Stage 3
- What is Opt Out for PEA?
- Opt Out Supporting Documentation
 - EHR-Generated MU Dashboard or Report
 - Audit Log Report of Opt Out Patients
 - Opt Out Letter
- MU Objective: Health Information Exchange Stage 3
- What is Query HIE?
- Request and Query HIE Supporting Documentation
 - Query HIE Enablement Letter
 - Audit Log Report of Deducted Patients
- Strategies and Tips for Success



Purpose of This Webinar

We want to help you:

- Meet the measures for
 - MU Objective 5 Patient Electronic Access
 - MU Objective 7 Health Information Exchange
- Save time by getting it right the first time and avoid application recycling
- Ensure accuracy of your MU supporting documentation

At the end of this session, attendees will take away:

- Why PEA and HIE are important
- An understanding of the expanded use of CEHRT functionality
- Alternative strategies for meeting the measures
- Solutions for minimizing potential issues
- Examples of approved Opt Out and Query HIE supporting documentation



EP provides patients with timely electronic access to their health information and patient-specific education

Measure 1: For more than 80% of patients*:

- (1) the patient is provided timely access to view, download, and transmit their health info; and
- (2) the patient's health info is available for the patient to access using any app of their choice configured to meet the technical specs of the Application Programming Interface (API)** in the provider's CEHRT

* When patients decline to participate in electronic access to their health information, the EP can use **Opt Out** to count those patients in order to meet the Measure 1 threshold.

** You can think of an Application Programming Interface (API) as the messenger that takes your request to an EHR and then delivers the EHR's response back to you.

Measure 2 (formerly patient-specific education): For **more than 35%** of patients, EP must use clinically relevant information from CEHRT to identify patientspecific educational resources and provide electronic access to those materials



Exclusions for Measure 1

- An EP may exclude from the measure if they have no office visits during the EHR reporting period
- Any EP that conducts 50% or more of his or her patient encounters in a county that does not have 50% or more of its housing units with 4Mbps broadband availability according to the latest information available from the FCC on the first day of the EHR reporting period may exclude the measure



Objective 5: Patient Electronic Access – Using Opt Out to demonstrate MU Stage 3

What is Opt Out for PEA?

Opt Out is an alternative strategy EPs can use to attest successfully when patients decline to participate in electronic access to their health information.

Opt Out allows you to count those patients toward meeting the Measure 1 threshold.

Using Opt Out for MU Stage 3

- Add Opt Out patients to your numerator if patients are provided all necessary info to:
 - Access their health information,
 - Obtain access through an authorized representative or
 - Otherwise opt back in without further action required by the EP
- EPs must still offer Opt Out patients all four functionalities (view, download, transmit, and access to API) and PHI needs to be made available for VDT
- If your EHR automatically includes Opt Out patients in the MU dashboard, simply upload the MU dashboard to MAPIR



Upload Supporting Documentation

Conditional supporting documentation applies only to EPs who manually added patients who opted out of PEA to the Measure 1 numerator because the EP's MU dashboard didn't automatically add these patients

Measure 1: Opt Out Supporting Documentation

- EHR-generated MU Dashboard
- Letter confirming Opt Out patients were provided all necessary information to access their health information
- Opt Out audit log or report with the unique IDs of the Opt Out patients that were added to the numerator
 - Redact any Patient Health Information
 - Report must be in Excel format



Using Opt Out for PEA - Stage 3

Opt Out Supporting Documentation

Opt Out Letter

Central Massachusetts Internal Medicine 100 North Drive, Westborough, MA 01581 508-000-0000

04/24/2019

To Whom It May Concern:

Letter Confirming the Opt-Out patients were provided all necessary information to access their information, obtain access through a patient-authorized representative, or otherwise opt-back-in without further follow up action required by the provider.

The letter must include a description of how a patient's Opt-Out action was recorded (for example a form, or other method). The letter must be signed by an authorized official at the location where the Opt-Outs occurred (EP, Designee, Clinical or Medical Director).

Sincerely,

Clark Kent, MD Clark Kent, MD Medical Director



Using Opt Out for PEA - Stage 3

Opt Out Supporting Documentation

Audit log or Report of Opt Out patients added to MU Dashboard numerator

- Unique IDs of the qualifying "Opt Out" patients added
- Log or report should be in Excel format
- Redact any PHI
- Only include patients who opted out

Patient ID	Patient DOB	Service Date	Provider	Email address	Reason for Opt-Out
1111111	1/1/2000	1/1/2019	Clark Kent, MD	N/A	Declined
2222222	1/10/2009	1/10/2019	Clark Kent, MD	N/A	No internet access
3333333	1/12/2002	1/12/2019	Clark Kent, MD	N/A	Declined
444444	1/8/1996	1/14/2019	Clark Kent, MD	janedoe@email.com	Declined
5555555	3/15/2001	1/14/2019	Clark Kent, MD	alincoln@email.com	Declined



Objective 5 - PEA: Entering Data Into MAPIR

Attestation Tab > Meaningful Use > Objective 5: Patient Electronic Access

Get Started 🔰 R8A/Contact Info 🗹 🔰 Eligibility 🗹 🔰 Patient Volumes 🗹 🔪 Attestation 📝 🗍 Review 💙 Submit 🔳 🔪 n Meaningful Use Objective Objective 5 Patient Electronic Access to Health Informati Objective 0 Objective 1 Click HERE to review CMS Guidelines for this measure Objective 2 🏈 Click the Save & Continue to proceed. Click Return to Main to access the main attestation topic list. Click Clear All Entries to remove entered data. Objective 3 Objective 4 (*) Red asterisk indicates a required field Objective 5 🌄 Objective: The EP provides patients (or patient authorized representative) with timely electronic access to their health information and patient Objective 6 specific education. Objective 7 Exclusion 1: An EP may exclude from the measure if they have no office visits during the EHR reporting period. * Does the exclusion apply to your if 'Yes', do not complete Measure 1 and 2. If 'No', complete Exclusion 2 O Yes O No. Exclusion 2: Any EP that conducts 50 percent or more of his or her patient encounters in a county that does not have 50 percent or more of its housing units with 4Mbps broadband availability according to the latest information available from the FCC on the first day of the EHR reporting period may exclude the measure. Does the exclusion apply to you? If 'Yes', do not complete Measure 1 and 2. If 'No', complete Measure 1 and 2 O Yes O No Measure 1: For more than 80 percent of all unique patients seen by the EP: (1) The patient (or the patient authorized representative) is provided timely access to view online, download, and transmit his or her health information; and (2) The provider 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 Application Programming Interface (API) in the provider's Certified EHR Technology. Numerator 1: 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 tachnical specifications of the API in the provider's Certified EHR Technology. Denominator 1: The number of unique patients seen by the EP during the EHR reporting period. Denominator 1: Numerator 1: Measure 2: The EP must use dinically relevant information from Certified EHR Technology to identify patient specific educational resources and provide electronic access to those materials to more than 35 percent of unique patients seen by the EP during the EI IR reporting period. Numerator 2: The number of patients in the denominator who were provided electronic access to patient-specific educational resources using dinically relevant information identified from Certified EMR Technology during the EMR reporting period. Denominator 2: The number of unique patients seen by the EP during the EHR reporting period. Numerator 2: Denominator 2 Return to Main Clear All Entries Save & Continue

Note: Opt out is not a choice/option in MAPIR.

Upload opt out report and opt out letter to MAPIR

Add the numerator from the report to the numerator in your dashboard, to equal the numerator entered in MAPIR to meet measure 1.

Enter the denominator from your dashboard.

Health Information Exchange – Stage 3

Measure 1

For more than 50% of transitions and referrals, the referring EP:

- 1. Uses CEHRT to create Summary of Care (SoC) record
- 2. Electronically exchanges the summary of care record

Measure 2

For **more than 40%** of transitions and referrals received, and encounters where the EP has never before seen the patient, EP incorporates electronic summary of care record in patient's EHR

• A record cannot be considered incorporated if it is discarded without the reconciliation of clinical information, or if it is stored in a manner not accessible for EP use within the EHR

Measure 3 (former Stage 2 Medication Reconciliation objective)

For **more than 80%** of transitions received and encounters where the EP has never before seen the patient, EP performs a clinical information reconciliation for the following three clinical information sets:

- 1. Medication
- 2. Medication allergy
- 3. Current problem list



Exclusions for Measure 2

- An EP may take an exclusion if either or both of the following apply:
 - The total transitions or referrals received and patient encounters in which he or she has never before encountered the patient, is fewer than 100 during the EHR reporting period
 - The EP conducts 50% or more of his or her patient encounters in a county that does not have 50% or more of its housing units with 4Mbps broadband availability according to the latest information available from the FCC on the first day of the EHR reporting period



Objective 7: Health Information Exchange – Using Requests & Query HIE for Stage 3

What is Query HIE?

Expanded CEHRT functionality that allows EPs to conduct searches for Summary of Care records

- If your EHR dashboard shows that you are meeting Measure 2, query-based HIE is not required
- If you receive insufficient electronic Summary of Care records to meet Measure 2, you can:
 - Use both Requests and Query HIE (if applicable) to obtain additional records

Do you have access to query-based HIE?				
Yes	Νο			
Make requests AND use query HIE to try to obtain Summary of Care records for transitions, referrals and first-time patients	Make requests to try to obtain Summary of Care records for transitions, referrals, and first-time patients			

 Deduct patients from the Measure 2 denominator if an electronic Summary of Care record was still *unavailable* for the patient after the EP made a request, and used Query HIE functionality (if applicable), to try to obtain such record



Objective 7: Health Information Exchange – Using Request & Query HIE for Stage 3

What constitutes unavailable?

- If the EP requested an electronic summary of care record to be sent and did not receive an electronic summary of care document and either:
 - Queried at least one external source via HIE functionality and did not locate a summary of care for the patient, or the provider does not have access to HIE functionality to support such a query, or
 - Confirmed that HIE functionality supporting query for summary of care documents was not operational in the provider's geographic region and not available within the EP's EHR network as of the start of the EHR reporting period
- Many 2015 Edition CEHRTs support Query HIE, either via vendor functionality or via integration of Query HIE platforms such as Commonwell or Carequality
- Not enabling the functionality does not count as "EP did not have access", nor as "not available in the EP's EHR network"
- Check with your vendor whether query HIE functionality is available and how to enable it
- Your vendor may charge a fee to enable query HIE functionality



Step-by-Step: Before MU Reporting Period – if EP has query access



Step-by-Step: Before MU Reporting Period – if EP has no access to query



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If the EP had access to Query HIE functionality, the EP must upload:

- EHR-generated MU Dashboard
- Letter signed by an authorized official (EP, Designee, Clinical/Medical Director) confirming that:
 - EP had access to Query HIE functionality that supports a query of external sources, and
 - EP's MU dashboard did not account for the patients that can be excluded
- Request and Query Audit Log in Excel format with unique IDs of patients deducted from the denominator, including:
 - For requests: the date the EP requested an electronic Summary of Care record, date of service, the provider contacted, and the method used to make the request (phone, secure email, secure messaging, or other method)
 - For query HIE: the date the EP used Query HIE to query at least one external source in which the EP did not locate a Summary of Care record for the patient, date of service, and the name or description of the external source(s)



EHR-generated MU Dashboard or report

- Selected MU reporting period
- Attesting provider's name
- Recorded numerator, denominator and percentages for this measure

	LOCATION GROUP: PROVIDER: Dr. Smith		
Objective 7 Measure 2 Objective 7: Health Information Exc	ID:	Period: 08/10/2018 to 11/	07/2018
Clinical Measure Objective 7 Measure 1	Numerator / D 0 /	 Science and the second s	NTAGE 0 %
Clinical Measure Objective 7 Measure 2	Numerator / Denon 30/120	ninator PERCENTAGE	
Objective 7 Measure 3	Numerator / Denominato 214 / 224	95 %	



 Letter signed by an authorized official at the location where the electronic Summary of Care records were unavailable (EP, Designee, Clinical or Medical Director) confirming the EP had access to Query HIE functionality that supports a query of external sources, and that the EP's MU dashboard did not account for the patients that can be excluded.

> Central Massachusetts Internal Medicine 100 North Drive Westborough, MA 01581 508-000-0000

04/24/2019

To Whom It May Concern:

Letter confirming the EP had access to Query HIE functionality that supports a query of external sources, and that the EP's MU dashboard did not account for the patients that can be excluded.

Sincerely, *Clark Kent, MD* Clark Kent, MD Medical Director



- Request and Query Audit Log in Excel format with the unique IDs of the patients deducted from the denominator (redact any PHI information, such as patient name), including:
 - The date the EP requested an electronic Summary of Care record, date of service, the provider contacted in the request, and the method used to make the request, e.g. phone, secure email, secure messaging, or other method
 - The date the EP used Query HIE functionality to query at least one external source in which the EP did not locate a Summary of Care record for the patient, date of service, and the name or description of the external source(s)

1	2	3	4	5	6	1	8	
					NO SOC RECEIVED FO	R PATIENT SEEN IN 90 DAY MU RP		
						5/1/2019-7/30/2019		
		REQUESTED (via MANUALLY P2P)				QUERY HIE (via system query)		
PROVIDER	DOS	UNIQUE PT ID	DATE REQUESTED E-SOC	PROVIDER CONTACTED	REQUEST METHOD	DATE EP USED QUERY HIE FUNCTIONALITY	NAME/DESCRIPTION OF EXTERNAL SOURCE	
DR. KENT	5/2/2019	11111	4/1/2019	DR. OZ	FAX	4/4/2019	Hospital ABC	
DR. KENT	5/20/2019	22222	4/2/2019	DR. ABC	PHONE	4/4/2019	State Repository	
DR. KENT	5/30/2019	33333	4/10/2019	DR. DOE	SECURE EMAIL	4/12/2019	MetroWest Ear, nose, throat	

• These patients can be deducted from the Measure 2 denominator on your EHR dashboard



If the EP had no access to Query HIE functionality, the EP must upload:

- EHR-generated MU Dashboard
- Letter signed by an authorized official (EP, Designee, Clinical/Medical Director) confirming that either
 - EP did not have access to Query HIE functionality that supports a query of external sources or
 - Query HIE functionality that supports query of external sources was not operational in the EP's geographic area and not available in the EP's EHR network*
- Request Audit Log in Excel format with the unique IDs of the patients deducted from the denominator including:
 - date the EP requested an electronic Summary of Care record, date of service, provider contacted, and the method used to make the request (phone, secure email, secure messaging, other)

* Many 2015 Edition CEHRTs support Query HIE, either via vendor functionality or via integration of Query HIE platforms, such as Commonwell or Carequality. Not enabling the functionality does not count as "EP did not have access", nor as "not available in the EP's EHR network." Check with your vendor whether Query HIE functionality is available and how to enable it.



EHR-generated MU Dashboard or report

- Selected MU reporting period
- Attesting provider's name
- Recorded numerator, denominator and percentages for this measure

	LOCATION GROUP: PROVIDER: Dr. Green	
Objective 7 Measure 2 Objective 7: Health Information Excl	ID: Period: ()8/10/2018 to 11/07/2018
Clinical Measure Objective 7 Measure 1	Numerator / Denominator 0 / 2	PERCENTAGE 0 %
Clinical Measure Objective 7 Measure 2	Numerator / Denominator 20/120	PERCENTAGE 17%
Objective 7 Measure 3		RCENTAGE



- Letter signed by an authorized official at the location where the electronic Summary of Care records were unavailable (EP, Designee, Clinical or Medical Director) confirming either
 - EP did not have access to Query HIE functionality that supports a query of external sources or
 - Query HIE functionality that supports query of external sources was not operational in the EP's geographic area and not available in the EP's EHR network, as of the start of the EHR Reporting Period

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04/24/2019

To Whom It May Concern

Letter confirming that either "the EP did not have access to Query HIE functionality that supports a query of external sources", or "the Query HIE functionality that supports query of external sources was not operational in the EP's geographic area and not available in the EP's EHR network, as of the start of the EHR Reporting Period".

Sincerely, *Clark Kent, MD* Clark Kent, MD Medical Director



- Request Audit Log provided in Excel format with the unique IDs of the patients deducted from the denominator (redact any PHI information) including:
 - The date the EP requested an electronic Summary of Care record, the date of service, the provider contacted in the request, and the method used to make the request (phone, secure email, secure messaging, or other method)

			NO SOC RECEIVED FOR PATI	IENT SEEN IN 90 DAY MU RP 5/1/2019-7/30/2019	
			REQUESTED (via MANUALLY	Y P2P)	
PROVIDER	DOS	UNIQUE PT ID	DATE REQUESTED E-SOC	PROVIDER CONTACTED	REQUEST METHOD
DR. KENT	5/2/2019	11111	4/1/2019	DR. OZ	SECURE EMAIL
DR. KENT	5/20/2019	22222	4/2/2019	DR. ABC	FAX
DR. KENT	5/30/2019	33333	4/10/2019	DR. DOE	PHONE

These patients can be deducted from the Measure 2 denominator on your EHR dashboard



Step-by-Step: Upon Attestation



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Step-by-Step: Upon Attestation





Entering Data Into MAPIR

Attestation Tab > Meaningful Use > Objective 7: Health Information Exchange (HIE)





Entering Data Into MAPIR

Attestation Tab > Meaningful Use > Objective 7: Health Information Exchange HIE (continued)





Strategies and Tips for Success

- Verify whether the total number of referrals and transitions received during the MU reporting period is 100+
 - EP can claim exclusion for the measure if fewer than 100
- Ensure data is being entered correctly into the EHR
- Ensure EHR accurately captures all transitions when an SoC record is received
- Check with vendor to ensure Query HIE is enabled in CEHRT
 - Many EHRs now provide access to Query HIE functionality
- Regularly check EP's MU Dashboard or EHR Report to ensure the EP is on track to meet all MU objectives and measures
 - Consider selecting a different MU reporting period for EP's best performance



Strategies and Tips for Success (continued)

- Contact MeHI for technical assistance with MU
- Request HIway Adoption and Utilization Support (HAUS) Services

HAUS Account Managers can assist your organization with incorporating HIE into your care coordination process:

- Conduct technical assessment and develop HIE Technology and Workflow plan
- Select project team and conduct project management
- Develop HIE use cases and identify HIE trading partners
- Implement the physical HIE connection
- Provide workflow process improvement training and design new workflows



MU Info Sessions

MU Information Sessions

Explore PY2019 and Stage 3 MU requirements, including

- health information exchange (HIE)
- clinical decision support (CDS)
- patient engagement
- supporting documentation

Tuesday, June 18 9:30am-3:00pm MeHI Westborough Office 100 North Drive Westborough, MA

<u>Register</u>

Thursday, August 29

9:30am-3:00pm MeHI Westborough Office 100 North Drive Westborough, MA

Register



Questions?



Contact Us





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