## MEANINGFUL USE "GO LIVE" FOR PHYSICIAN PRACTICES

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San Diego, California
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#### WHAT IS MEANINGFUL USE?

#### » Quality, efficiency, and information sharing

- » Will require electronic exchange of quality measures
- » Will facilitate coordination of care through the transmission of clinical summaries

#### » Drives importance of decision support

- » preventive services
- » medication management
- » diagnostic testing
- » Over the next 5 years, the definition of meaningful use **will evolve** and requirements expand requiring more features and more data exchange

#### THE PATH TO 2015

First Payment Year	2011	2012	2013	2014	2015 and later**
2011	Stage 1	Stage 1	Stage 2	Stage 2	TBD
2012		Stage 1	Stage 1	Stage 2	TBD
2013			Stage 1	Stage 1	TBD
2014				Stage 1	TBD
2015 and later*					TBD

<sup>\*</sup>Avoids payment adjustments only for EPs in Medicare EHR Incentive Program

<sup>\*\*</sup>In Final Ruled, CMS defers on establishing policy after 2014

#### ALL-OR-NOTHING-AT ALL APPROACH

- » Not required to participate....yet
- » Must meet all of the requirements
- » Purchasing EMR is not enough
- » Will need to qualify again in Stage 2 & Stage 3

#### **OPPORTUNITY COST**

- » You need a plan and commitment to this initiative
  - » Manage the MU project people, resources, knowledge assets
  - » Upgrade or install hardware and software
  - » Conduct routine team meetings
  - » Physician involvement clinical cons
  - » Training for staff and providers

# MEANINGFUL USE FINAL REQUIREMENTS

## REQUIRED OBJECTIVES AND MEASURES-STAGE 1

#### **Eligible Providers**

#### 15 Core objectives

Most require achievement of performance targets

#### 5 Objectives out of 10 from Menu set

Most require achievement of performance targets

#### 6 total Clinical Quality Measures

Do not have performance targets

- 3 core or alternate core
- 3 out of 38 from menu set

#### 15 CORE MEASURES – ALL APPLY

- Use CPOE by licensed healthcare professionals at least 1 medication order for 30% unique patients
- 2. Implement drug-drug and drug-allergy interaction checks **Enabled**
- 3. E-Prescribing 40% of all permissible prescriptions are transmitted
- 4. Record demographics 50% of all unique patients have in structured data
- 5. Maintain an up-to-date problem list 80% of all unique patients
- 6. Maintain active medication list 80% of all unique patients
- 7. Maintain active medication allergy list 80% of all unique patients
- 8. Record and chart changes in vital signs 50% of all unique patients over 2
- 9. Record smoking status 50% of all unique patients over age 13
- 10. Implement one clinical decision support rule One rule and track progress
- 11. Report 6 Clinical Quality Measures to CMS Attest 2011, report 2012
- 12. Electronically exchange key clinical information **Perform one test**
- 13. Provide electronic copy of their health information 50% requesting, within 3 days
- 14. Provide clinical summaries for patients for each office visit 50%, within 3 days
- 15. Protect electronic health information for EHR **Perform risk analys**is

#### MENU SET – SELECT 5

#### 1 MUST BE A PUBLIC HEALTH MEASURE

- 1. Implement drug-formulary checks Enable function
- 2. Incorporate clinical lab test results into EHR as structured data 40%, all
- 3. List of patients by specific conditions One list
- 4. Send reminders to patients for preventive/ follow up 20% of unique patients >64 years, or <6 years of age
- 5. Provide timely electronic *access* to pt. health records (portal) 10% (including lab results, problem list, medication lists, medication allergies)
- 6. Provide patient education resources to the patient 10% of all unique pts
- 7. Perform medication reconciliation at relevant encounters and each transition of care 50%
- 8. Provide summary of care record for each transition and referrals 50%
- 9. Submit electronic data to immunization registries One Test
- 10. Submit syndromic surveillance data to public health agency One Test

### EPs 3 CORE QUALITY MEASURES

	Select 3 Core Measures						
1	Blood pressure measurement						
2	Tobacco screening and cessation						
3	Adult weight screening and follow-up						
	Alternate Measures if the above do not apply						
	Child/Adolescent weight counseling						
	Childhood immunization status						
	Adult over 50 Influenza screening						
	Select 3 other Quality Measures						
	38 additional clinical quality measures to choose from						

If none of the Core or Alternate Measures are appropriate, select three others and report those measures

### CLINICAL QUALITY MEASURES (CQM)

- » Stage 1 requires data only no measurement of quality performance
- » Clinical quality measures consist of:
  - » Denominator which defines the <u>population</u> of patients eligible for the quality measure,
  - » Numerator, which defines the quality action for each patient
- » If you do not have any eligible patients, the denominator reported would be zero
- » Limited to measures that can be captured electronically
- » EPs required to collect measures for all patients, regardless of payer

#### **3 OTHER CLINICAL QUALITY MEASURES**

There are a 6 clinical measures needed. Three are required (or alternates to be used) and you select 3 others from measures on the list of 44 measures.

1	% of patients aged 5 through 40 years with a diagnosis of mild, moderate, or severe persistent asthma who were prescribed either the preferred long-term control medication (inhaled corticosteroid) or an acceptable alternative treatment.
2	% of patients aged 5 through 40 years with a diagnosis of asthma and who have been seen for at least 2 office visits, who were evaluated during at least one office visit within 12 months for the frequency (numeric) of daytime and nocturnal asthma symptoms.
3	% of children 2-18 years of age, who were diagnosed with pharyngitis, dispensed an antibiotic and received a group A streptococcus (strep) test for the episode.
4	% of adolescent and adult patients with a new episode of alcohol and other drug (AOD) dependence who initiate treatment through an inpatient AOD admission, outpatient visit, intensive outpatient encounter or partial hospitalization within 14 days of the diagnosis and who initiated treatment and who had 2 or more additional services with an AOD diagnosis within 30 days of the initiation visit.
5	% of patients, regardless of age, who gave birth during a 12-month period who were screened for HIV infection during the first or second prenatal care visit.
6	% of D (Rh) negative, unsensitized patients, regardless of age, who gave birth during a 12-month period who received anti-D immune globulin at 26-30 weeks gestation.
7	% of women 15- 24 years of age who were identified as sexually active and who had at least one test for chlamydia during the measurement year.

#### SECURITY RISK ANALYSIS

- » All e-PHI created, received, maintained or transmitted by an organization is subject to the HIPAA Security Rule
- » Security Rule does not prescribe a specific risk analysis methodology
- » HITECH requires entities to re-evaluate risks and vulnerabilities in their environments and to implement reasonable and appropriate security measures to protect against reasonably anticipated threats or hazards to the security or integrity of e-PHI.
- » The Office of the National Coordinator has posted a Guidance for Practices: <a href="http://www.hhs.gov/ocr/privacy/hipaa/administrative/securityrule/radraftguidance.pdf">http://www.hhs.gov/ocr/privacy/hipaa/administrative/securityrule/radraftguidance.pdf</a>

## HIMSS Information Technology Security Practices Questionnaire

- 3.3 Is functionality built into the application which allows remote user access and/or control?
- 3.4 If requested, can the application associate remote support activities with an individual employee of the vendor? (accountability)
- 3.5 Do vendor support personnel have specific roles and accesses that control access to ePHI? (See section 1.11)
- 3.6 Does the audit system log remote support connection attempts and remote support actions such as application or configuration modifications?
- 4. PROTECTION FROM MALICIOUS CODE
- 4.1 Is the application compatible with commercial off the shelf (COTS) virus scanning software products for removal and prevention from malicious code? **a.** If no, indicate what additional security controls are included with the
  - a. If no, indicate what additional security controls are included with the application/system used to mitigate the risks associated with malicious code:
- 4.2 Does the application's client software operate without requiring the user to have local administrator level rights in order to run the application?
- 5. CONFIGURATION MANAGEMENT AND CHANGE CONTROL Yes

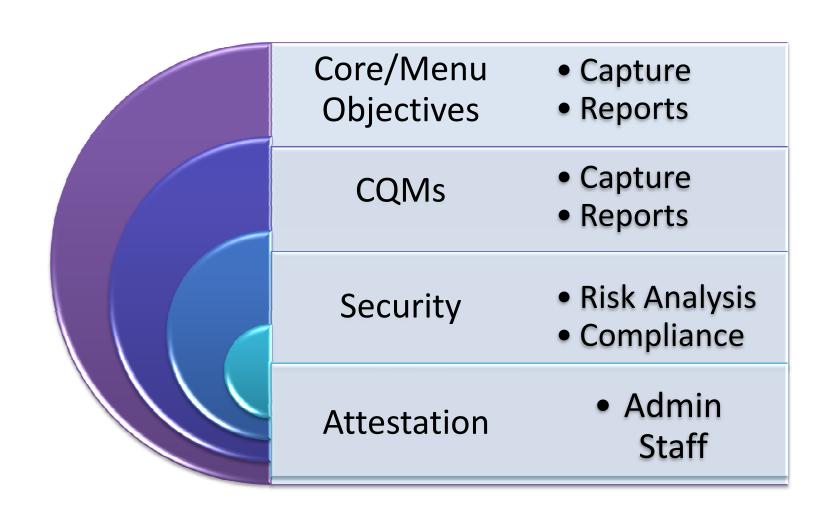
http://www.himss.org/content/files/ApplicationSecurityv2.3.pdf

## Exclusions for Core and Menu Objectives

	Meaningful Use Core Measures: 1-15							
#	Title	Exclusion						
1		Any physician who writes fewer than 100 prescriptions during						
_ 1	CPOE for medication order	reporting period.						
4	Eprescribe	Any physician who writes fewer than 100 prescriptions						
		Any physician who either sees no patients 2 years or older, or who						
8		believes that all three vital signs of height, weight, and blood pressure						
	Record vital signs	have no relevance to the scope of their practice						
9	Record smoking status	Any physician who sees no patients 13 years or older						
12	Electronic copy of health	Any physician who has no requests from patients for an electronic						
12	information	copy of health information						
13	Clinical summaries	Any physician who has no office visits during the reporting period						
	Meani	ngful Use Menu Set Measures: 1-10						
1	Drug formulary checks	Any physician who writes fewer than 100 prescriptions						
2		Any physician who orders no lab tests whose results are in either a						
	Clinical lab test results	positive/negative or numeric format during the reporting period.						
4		A physician who has no patients 65 years or older or 5 years or						
4	Patient reminders	younger with records maintained using certified EHR technology						
		Any physician who neither orders lab tests or information that would						
5		be contained in the problem list, medication list, or medication allergy						
	Patient electronic access	list during the reporting period.						
7	Medication reconciliation	Any physician who was not the recipient of any transitions of care						
8	Transition of care summary	Any physician who neither transfers or refers a patient						
10		A physician who does not collect any reportable syndromic						
10	Syndromic surveillance	information						

## PLANNING FOR INCENTIVES

#### WHO WILL BE THE COORDINATOR?



### **BUDGET PLANNING**

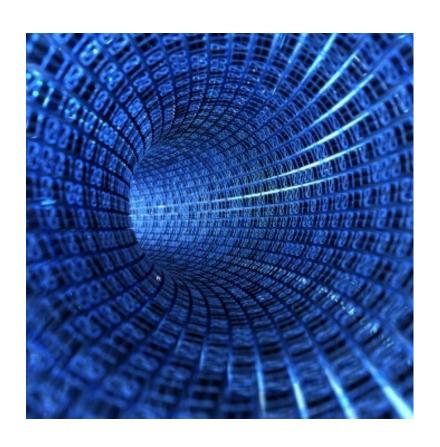
2.2 Meaningful Use Budget									
Item	Cost	#	Total Cost	Notes					
Software Licensing	Software Licensing								
Provider EMR License	\$ 4,253	6	\$ 25,515						
Other EMR Licenses	\$ 2,138	3	\$ 6,413						
Patient Portal Per Provider	\$ 1,000	6	\$ 6,000						
Secure Messaging Per Provider	\$ 1,000	6	\$ 6,000						
Upgrade technician	\$ 75	6	\$ 450						
Project Manager	\$ 50	60	\$ 3,000						
Staff Training	\$ 1,000								
Sub Total Content and Software	\$ 48,378								

#### **INCENTIVE PAYMENTS**

Provider	# Prov	Qualified Incentive	Date to Implement for 2011	Pymt Yr 2011	Pymt Yr 2012	Pymt Yr 2013	Pymt Yr 2014	Pymt Yr 2015	Pymt Yr 2016	Total
Example Medicare	1	Medicare	By Oct. 1, 2011	\$18,000	\$12,000	\$8,000	\$4,000	\$2,000	\$0	\$44,000
Example Medicaid	1	Medicaid	By Oct. 1, 2011	\$21,250	\$8,500	\$8,500	\$8,500	\$8,500	\$8,500	\$63,750
Example Medicaid Peds	1	MCaid Peds	By Oct. 1, 2011	\$14,167	\$5,667	\$5,667	\$5,667	\$5,667	\$5,667	\$42,502
Medicare Specialists	6	Medicare	By Oct. 1, 2011	\$108,000	\$72,000	\$48,000	\$24,000	\$12,000	\$0	\$264,000
Medicare Primary	0	Medicare	By Oct. 1, 2011	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Medicaid Providers (30%)	0	Medicaid	By Oct. 1, 2011	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Medicare Psychiatrist (MD)	1	Medicare	By Oct. 1, 2011	\$18,000	\$12,000	\$8,000	\$4,000	\$2,000	\$0	\$44,000
CNM/NP (30% Medicaid encounters)	1	Medicaid	By Oct. 1, 2011	\$21,250	\$8,500	\$8,500	\$8,500	\$8,500	\$8,500	\$63,750
PEDS Medicaid Providers (20%)	0	MCaid Peds	By Oct. 1, 2011	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Rural PA Heading Clinic	0	Medicaid	By Oct. 1, 2011	\$0	\$0	\$0	\$0	\$0	\$0	\$0
# Providers	8		ANNUAL	\$147,250	\$92,500	\$64,500	\$36,500	\$22,500	\$8,500	\$371,750

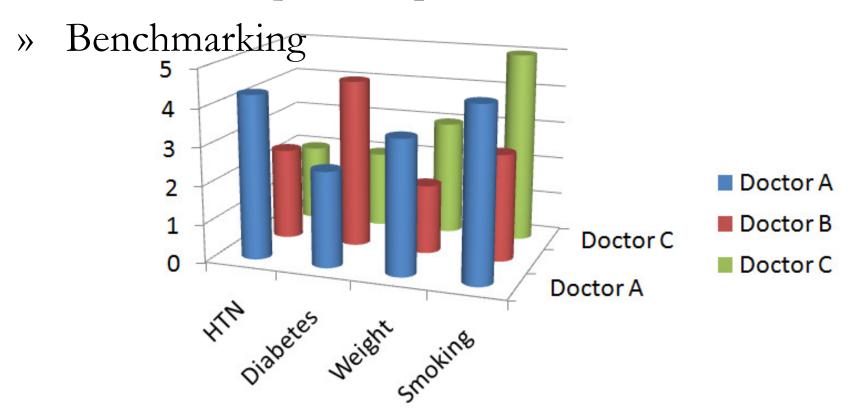
#### WHO WILL COLLECT THE DATA?

- » CPOE/ePrescribing –Licensed Healthcareonly
- » Medicationreconciliation
- » Language preference
- » Smoking status
- » Race/Ethnicity



#### WHO WILL REPORT AND MONITOR?

- » Weekly monitoring
- » CMS/State quality reports



## REGISTER NOW

#### **REGISTRATION & REPORTING**

#### » Who

- » All register on CMS website
- » Medicaid Providers register with their State
- » "Attest" or report Clinical Quality Measures (CQM) to State for Medicaid and CMS for Medicare

#### » What

- » Demographics, NPI, planned participation program, Certified EHR Technology, and Tax ID for payments
- » States will ask providers for additional information, patient encounter volume, costs, and A/I/U or Meaningful Use

#### » When

- » Now, registration opened January 3, 2011
- » Any time before October 1, 2011 to meet 90 day requirement in 2011

#### STEP 1

» Registration for both the Medicare and Medicaid occur at the National Level Repository (NLR) which is managed by CMS Registration Guide:

 $\underline{http://www.cms.gov/EHRIncentivePrograms/Downloads/EHRMedicareEP\_RegistrationUserGuide.pdf}$ 

» Registration available now:

http://www.cms.gov/EHRIncentivePrograms/



#### STEP 2

State	Expected Launch Date	State	Expected Launch Date
AK	Jan-11	IL	late Spring 2011
IA	Jan-11	IN	Mid-2011
KY	Jan-11	AR	Spring 2011
LA	Jan-11	DE	Spring 2011
MI	Jan-11	MT	Spring 2011
MS	Jan-11	NV	Summer 2011
NC	Jan-11	OR	Summer 2011
ОК	Jan-11	WY	Summer 2011
SC	Jan-11	ME	Aug-11
TN	Jan-11	NY	Sep-11
TX	Jan-11	UT	Sep-11
CA	Feb-11	ID	Fall 2011
MO	Feb-11	MN	Fall 2011
ND	Feb-11	NE	Fall 2011
AL	Mar-11	SD	Fall 2011
WA	Apr-11	VA	Fall 2011
KS	Jun-11	NH	Winter 2011/2012
RI	Jun-11		

https://www.cms.gov/EHRIncentivePrograms/40\_MedicaidStateInfo.asp

#### STEP 3

- » EPs must attest to CMS that:
  - » A certified EHR system is used
  - » That EHR successfully achieves the EHR functionality requirements and associated measures.
- » EPs must also attest to CMS on the quality reporting requirements in 2011, that:
  - » The measure data was generated as output of a certified EHR;
  - » Report aggregate results to CMS or states (in the case of Medicaid providers);
  - » The data (including numerators, denominators, and exclusions for each of the applicable measures) are accurate; and
  - » The data for each measure include all patients to whom the measure applies.

#### **STAGE 2 & 3**

- 1. Use the CMS portal to perform upload process
- 2. Submit the required clinical quality measures data through Health Information Exchange (HIE)
- 3. Submit through certified registries
- Attestation on achieving meaningful use will be required as part of the submission.
- Specifications for quality submissions will be developed by July 1, 2011.

## GETTING STARTED

## MAKE A PROJECT PLAN

ID	Notes	% Complete	_	Task Name	Duration	Start
72		0%	0	Conduct or reviews securityrisk analysis	1 day?	Fri 10/2 2/10
73		0%		Collaborate with Security and HIPAA Committees	1 day?	Frl 10/22/10
74		0%		Perform Risk analysis	1 day:	FrI 10/22/10
75		0%		Report gaps	1 day?	FrI 10/22/10
76		0%		identify Policy and Procedures that need update or development	1 day?	Frl 10/22/10
77		0%		identify resource for policy implementation	1 day?	Frl 10/22/10
78		0%		Clinical Content Management	1 day?	Fri 10/22/10
79		0%		Determine which editors to use	1 day?	Frl 10/22/10
80		0%		Clinical Committee Sign-off	1 day?	Frl 10/22/10
81		0%		Document Templates & Encounter Types	1 day?	Frl 10/22/10
82		0%		Test	1 day?	Frl 10/22/10
83		0%		Develop test scenarios	1 day?	Frl 10/22/10
84		0%		Sign off on Test cases	1 day?	Frl 10/22/10
85		0%		Validate test scenarios produce expected results	1 day?	Frl 10/22/10
86		0%		Sign Off on Test Results	1 day?	Frl 10/22/10
87		0%		Manage M U I noen tive Payments	1 day?	Fri 10/2/2/10
88		0%		Complete tables to identify which providers will qualify under which plan	1 day?	Frl 10/22/10
89		0%		Assure all providers have NPI number	1 day?	Frl 10/22/10
90		0%		Assure all Medicare providers are on the PECOS system	1 day?	Frl 10/22/10
91		0%		identify timing of report submission	1 day?	Fri 10/22/10
92		0%		identify responsible party for report submission	1 day?	Frl 10/22/10
93		0%		Identify locations for report submission	1 day?	Frl 10/22/10
94		0%		Identify sign up location for providers	1 day?	Fri 10/2/2/10
95		0%		Identify team to enroll providers	1 day?	Frl 10/22/10
96		0%		Develop timing spreadsheet estimating provider qualifications	1 day?	Frl 10/22/10

#### MAKE A CHECKLIST

		Data	Work
#	Eligible Professionals	Element	Flow
		Identified	Done
1	Use CPOE 30%		
2	Implement drug-drug and drug-allergy interaction checks Enabled		
3	E-Prescribing 40%		
4	Record demographics 50%		
5	Maintain an up-to-date problem list 80%		
6	Maintain active medication list 80%		
7	Maintain active medication allergy list 80%		
8	Record and chart changes in vital signs 50%		
9	Record smoking status 50%		
10	Implement one clinical decision support rule One rule (all can share)		
11	Report 6 Clinical Quality Measures to CMS Attest 2011, report 2012		

### SELECT YOUR 3 QUALITY MEASURES

#### Measure Title: Hypertension: Blood Pressure Measurement

Measure Description: Percentage of patient visits for patients aged 18 years and older with a diagnosis of hypertension who have been seen for at least 2 office visits, with blood pressure (BP) recorded

#### **Numerator Calculation:**

1. A diagnosis of Hypertension must be recorded in the patient's Summary Active Problem field.

(401.0, 401.1, 401.9, 402.00, 402.01, 402.10, 402.11, 402.90, 402.91, 403.00, 403.01, 403.10, 403.11, 403.90, 403.91, 404.00, 404.01, 404.02, 404.03, 404.10, 404.11, 404.12, 404.13, 404.90, 404.91, 404.92, 404.93)

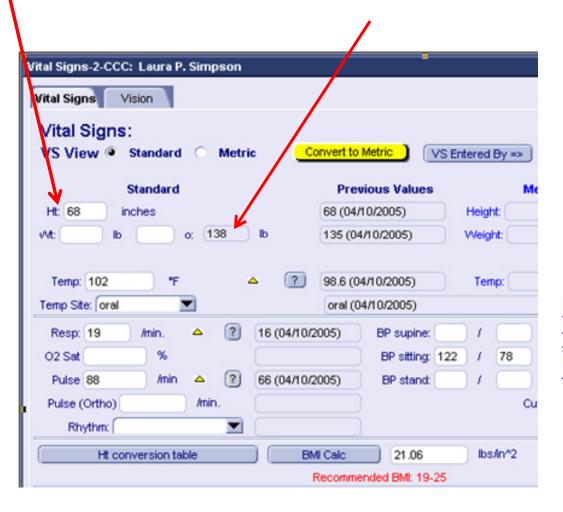
- 2. Patient must be at least 18 years of age or older at the start of the reporting period and have at least two face-to-face encounters with the provider during the reporting period.
- 3. At least one Blood Pressure reading should be performed and documented during the reporting period in the Vital Signs chart section.

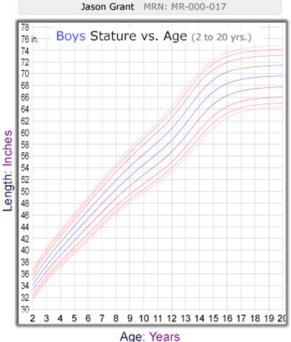
#### Denominator Calculation:

- 1. The number of patients that were at least 18 by the start of the reporting period;
- 2. And have had at least two face-to-face encounters with the physician during the reporting period;
- 3. And have a diagnosis of Hypertension in the Summary Active Problems field

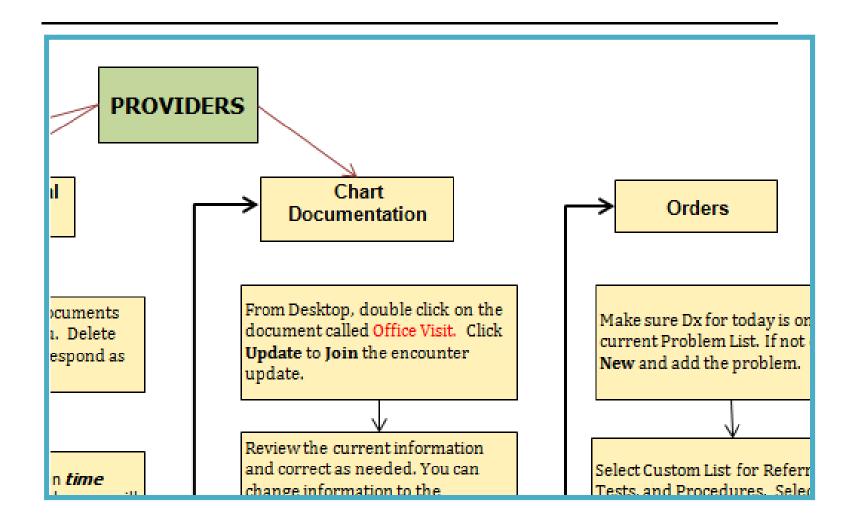
http://www.cms.gov/QualityMeasures/03\_ElectronicSpecifications.asp#TopOfPage

#### MAP YOUR DATA ELEMENTS





#### PREPARE TRAINING DOCUMENTS



#### TEST ALL REPORTS

#	Stage 1 Reporting Needs	Report Tested			
1	% of orders entered directly by physicians through CPOE				
2	Formulary or drug to drug checking was used, or function is enabled Y or N				
3	% of patients with problem lists updated				
4	% of all medications ordered that were ePrescriptions				
5	% of all patients with updated medication lists				
6	% of all patients with updated allergy lists				
7	% of all patients with complete demographics recorded				
8	% of patients with recorded BMI and vital signs				

Your Vendor Will Supply Report Tools for MU

#### WHAT'S IN THE TEA LEAVES?

Stage 1	Proposed Stage 2
CPOE for medication orders (30%)	CPOE (by licensed professional) for at least 1 medication, and 1 lab or radiology order for 60% of unique patients who have at least 1 such order (order does not have to be transmitted electronically
E-prescribing (eRx) (40%)	<b>50</b> % of orders transmitted as eRx
Send patient reminders (20%)	Make core requirement.
NEW	30% of visits have at least one electronic EP note

#### FINAL THOUGHTS

- » Start now
- » Use resources:
  - » CHUG
  - » Peers
  - » Professional Groups
- » Keep it simple and clear