Overview of the Changes Promoting Interoperability Requirements for 2019

The purpose of this document is to compare the Promoting Interoperability (PI) objectives and measures for hospitals vs. Medicare clinicians under the Merit-based Incentive Program (MIPS) vs. Medicaid requirements. Under the Medicare hospital Promoting Interoperability (PI) Program and the MIPS PI performance category requirements, there is better alignment and new opioid measures are optional. Some measures have also been removed. Medicaid measures largely retain the previous Stage 3 construct however, CMS has made some changes.

KEY CHANGES:

**Hospitals:**
- Final IPPS rule [here](#).
- 2019 Medicare measure specification sheets [here](#).
- Under the public health measures hospitals now only must select any two measures rather than having to meet syndromic reporting plus one additional registry measure.
- New opioid measures are finalized as proposed, except the Verifying the Opioid Treatment Plan measure is now optional for both 2019 and 2020.
- Modified Stage 2 requirements for EHs in 2018 (included for comparison purposes only)

**MIPS Clinicians:**
- Final QPP rule [here](#).
- New opioid measures have been finalized.
- In 2018 clinicians could pick any two public health measures and earn 10 points for the first and 5 points for the second. For 2019 if a clinician reports on two measures they earn 10 points.
- Go [here](#) for a detailed summary of the objectives and measures for 2019.
- 2019 specification sheets are [here](#).

**Medicaid**
- For 2019, CMS made changes to Objective 6, Coordination of Care – Measures 1 (View, Download, Transmit) and 2 (Secure Messaging) for EPs; both remain at a threshold of 5%. Under Objective 8, Public Health Reporting, for Measure 2 (Syndromic Surveillance), CMS removed restrictions around urgency care settings; also, CMS did not change any requirements for registries that they had to accept data from EPs. If an EP meets the requirements of a registry, they can use it; if not, they can take the exclusion.
- 2019 specification sheets for 2019 for hospitals [here](#) and for clinicians [here](#).
<table>
<thead>
<tr>
<th>2018 Medicare</th>
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<tbody>
<tr>
<td><strong>Objective:</strong> Protect Patient Health Info</td>
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<td><strong>Measure:</strong> Security Risk Analysis</td>
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<tr>
<td>Base for MIPS ECs.</td>
<td>Objective: CDS Measures:</td>
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<td><strong>Objective:</strong> CDS Measures:</td>
<td>1. Use 5 CDS related to 4 CQMs</td>
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<td><strong>Measure:</strong> Use 5 CDS related to 4 CQMs</td>
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<tr>
<td>1. Meds: 60%</td>
<td>2. Labs: 30%</td>
<td>3. Imaging: 60%</td>
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<td><strong>Objective:</strong> eRx Measure:</td>
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<tr>
<td>EH: 10%</td>
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<td>EH: 25%</td>
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<tr>
<td>EC: Required / Base</td>
<td>EP: 50%</td>
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<td><strong>Objective:</strong> Patient Specific Education Measure:</td>
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<td><strong>Objective:</strong> Provider to Patient Exchange Measure:</td>
<td><strong>Objective:</strong> Patient electronic access Measures:</td>
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<td><strong>Patient education via CEHRT:</strong></td>
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<td><strong>Provide Patients Electronic Access to Their Health Information:</strong></td>
<td><strong>Give VD&amp;T and API access:</strong></td>
</tr>
<tr>
<td>EH: 10%</td>
<td>10%</td>
<td>40 points</td>
<td>80%</td>
</tr>
<tr>
<td>EC: Not required / Performance Up to 10%</td>
<td>Patient education via CEHRT:</td>
<td>1. Give VD&amp;T and API access:</td>
<td>2. Use CEHR to give education resources to patients:</td>
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1 For the purposes of this fact sheet, for 2018 this refers to Modified Stage 2 requirements.
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<td>2018 MIPS EC</td>
<td>2018 Medicaid EPs</td>
<td>Done</td>
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<td>2019 Medicare Hospital</td>
<td>2019 MIPS EP</td>
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**Objective: Patient Electronic Access**

**Measures:**
- **EH:**
  1. Provide access within 36 hours of discharge: 50%
  2. View, download, transmit: at least one patient
- **EC:**
  1. Provide Patient Access – Required / Base. Up to 20% points
  2. VDorT – Not required / Performance. Up to 10% points

**Objective: Patient electronic access**

**Measures:**
- 1. Give VDorT access: 50%
- 2. Patients VDorT info to 3rd party: 5%

**Objective: Health Information Exchange (HIE) Measures:**

**EH:** Use CEHRT to create & send Summary of Care (SoC): 10%
- EC: Up to 20% points. Base / Required
  1. Send a Summary of Care (SoC) using CHERT
  2. Send SoC: For at least one patient

**Objective: HIE Measures:**

**Use CEHRT to create SoC & send SoC: 10%**
- 1. Support Electronic Referral Loops by Sending Health Information (20 points)
- 2. Support Electronic Referral Loops by Receiving and Incorporating Health Information (20 points)

**Objective: HIE Measures:**

**Use CEHRT to create & send SoC: 50%**
- 1. Use CEHRT to create & send SoC: 50%
- 2. Incorporate SoC into EHR for transitions / referrals: 40%
- 3. Clinical info reconciliation for referrals / transitions: 80%

**Objective: Secure Messaging**

**Measure:** Send secure message - Performance / not required. Up to 10% points

**Objective: Secure messaging Measure:**

**EH:** Send to patients: 5%
- **EP:** Not required

**Objective: Secure messaging Measure:**

See Coordination of Care

| Objective: Coordination of Care Measures: (Attest to all 3; meet 2) |
| 1. VDorT and API: EP: 5%  
  EH: 10% |
| 2. Secure messaging: EP: 5%  
  EH: 25% |
| 3. PGD: 5% for both EH and EP |
| 4. 25% |
|-------------------------------|---------------|---------------|---------------|---------------|------------------|---------------|------------------|
| **Objective:** Medication reconciliation  
**Measure:** Medication reconciliation for ToC: 50% | **Objective:** Clinical information reconciliation  
**Measure:** Clinical info reconciliation – Performance / not required. Up to 10% points | **Objective:** Medication reconciliation  
**Measure:** For ToC: 50% |  |  |  | See HIE |

**Objective:** Public Health and Clinical Data Exchange  
**Measures:**  
EH: Report to 3:  
1. Immunization  
2. Syndromic  
3. Specialized Registry  
4. Electronic Lab  
EC: Report on public health measure: Up to 10% points. Performance / not required  
1. Immunization  
2. Syndromic  
3. Specialized     
   
Bonus points:  
1. Report an extra one for 5% bonus points;  
2. Report improvement-activities using CEHRT (10%);  

**Objective:** Public Health Reporting  
**Measures:**  
EH: Meet 3 of 4 below  
1. Immunization  
2. Syndromic  
3. Specialized  
4. Laboratory  
EC: Meet 2 of 3 below.  
1. Immunization  
2. Syndromic  
3. Specialized registry  

**Objective:** Public Health and Clinical Data Exchange  
**Measures:**  
Pick any 2.  
1. Syndromic  
2. Immunization  
3. Electronic Case Reporting  
4. Public Health  
5. Clinical Data  
6. Laboratory (EH only)  

**Objective:** Public Health and Clinical Data Exchange  
**Measures:**  
EP: Pick any 2:  
1. Syndromic  
2. Immunization  
3. Electronic Case Reporting  
4. Public Health  
5. Clinical Data  
6. Laboratory (EH only)