

# Medicare Promoting Interoperability PROGRAM

## ELIGIBLE HOSPITALS AND CRITICAL ACCESS HOSPITALS OBJECTIVES AND MEASURES FOR THE 2024 EHR REPORTING PERIOD

The following information is for eligible hospitals and critical access hospitals (CAHs) attesting to CMS for their participation in the Medicare Promoting Interoperability Program in calendar year (CY) 2024.

Objective	Health Information Exchange
Measure	<b>Support Electronic Referral Loops by Receiving and Reconciling Health Information:</b> For at least one electronic summary of care record received using certified electronic health record (EHR) technology (CEHRT) for patient encounters during the EHR reporting period for which an eligible hospital or CAH was the receiving party of a transition of care or referral, or for patient encounters during the EHR reporting period in which the eligible hospital or CAH has never before encountered the patient, the eligible hospital or CAH conducts clinical information reconciliation for medication, medication allergy, and current problem list using CEHRT.

### Definition of Terms

**Active/Current Medication List:** A list of medications that a given patient is currently taking.

**Active/Current Medication Allergy List:** A list of medications to which a given patient has known allergies.

**Allergy:** An exaggerated immune response or reaction to substances that are generally not harmful.

**Care Plan:** The structure used to define the management actions for the various conditions, problems, or issues. A care plan must include, at a minimum, the following components: goals, health concerns, assessment, and plan of treatment.

**Current Problem Lists:** At a minimum a list of current and active diagnoses.

**Health Information Exchange:** “HIE” broadly refers to arrangements that facilitate the exchange of health information and may include arrangements commonly denoted as exchange “frameworks,” “networks,” or using other terms.

**Referral:** Cases where one provider refers a patient to another, but the referring provider maintains his or her care of the patient as well.



**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 electronic summary of care records received using certified electronic health record technology (CEHRT) for patient encounters during the EHR reporting period for which an eligible hospital or CAH was the reconciling party of a transition of care or referral, and for patient encounters during the EHR reporting period in which the eligible hospital or CAH has never before encountered the patient.
- **NUMERATOR:** Number of electronic summary of care records in the denominator for which clinical information reconciliation is completed using CEHRT for the following three clinical information sets: (1) Medication – Review of the patient’s medication, including the name, dosage, frequency, and route of each medication; (2) Medication Allergy – Review of the patient’s known medication allergies; and (3) Current Problem List – Review of the patient’s current and active diagnoses.
- The EHR reporting period in 2024 for participants attesting to CMS is a minimum of any continuous 180-day period within the calendar year.
- Eligible hospitals and CAHs now have three reporting options for meeting the Health Information Exchange Objective:
  1. Report on both the Support Electronic Referral Loops by Sending Health Information measure and the Support Electronic Referral Loops by Receiving and Reconciling Health Information measure, OR
  2. Report on the HIE Bi-Directional Exchange measure, OR
  3. Report on the Enabling Exchange Under the Trusted Exchange Framework and Common Agreement (TEFCA) measure.

## Scoring Information

- Total points available for this measure: 15
- 100 total points will be available for the required objectives and measures of the Medicare Promoting Interoperability Program.
- Failure to report at least a “1” for all required measures with a numerator or reporting a “No” for a Yes/No response measure will result in a total score of 0 points for the Medicare Promoting Interoperability Program. Eligible hospitals or CAHs who fail to achieve a minimum total score of 60 points are not considered meaningful users and may be subject to a downward payment adjustment.
- *Rounding:* When calculating the performance rates and measure and objective scores, scores will be rounded to the nearest whole number.
- *Reminder:* In order to earn a score greater than zero, an eligible hospital or CAH must complete the activities required by the Security Risk Analysis and SAFER Guides measures, submit their complete numerator and denominator or Yes/No data for all required measures, submit their level of engagement for the Public Health and Clinical Exchange measures, attest to the Actions to limit or

restrict the compatibility or interoperability of CEHRT statement, and the ONC Direct Review attestation, as well as report on the required electronic clinical quality measure data.

## Additional Information

- For an EHR reporting period in CY 2024, eligible hospitals and CAHs must use technology certified to the ONC Certification Criteria for Health IT necessary to meet the CEHRT definition (88 FR 79307).
- To learn more about the [ONC](#) Certification Criteria for Health IT finalized in the ONC “Health Data, Technology, and Interoperability: Certification Program Updates, Algorithm Transparency, and Information Sharing” final rule (89 FR 1205), we encourage hospitals to visit <https://www.crowell.com/en/insights/client-alerts/onc-releases-final-rule-on-information-blocking-and-health-it-certification-program-updates-including-requirements-related-to-ai>
- To check whether a health IT product that has been certified to the ONC Certification Criteria for Health IT, visit the Certified Health IT Product List (CHPL) at <https://chpl.healthit.gov/>.
- Certified functionality must be used as needed for a measure action to count in the numerator during an EHR reporting period. However, in some situations the product may be deployed during the EHR reporting period but pending certification. In such cases, the product must be certified by the last day of the EHR reporting period.
- Patients whose records are maintained using CEHRT must be included in the denominator for transitions of care.
- Eligible hospitals and CAHs are not required to manually count each individual non-health-IT-related action taken to engage with other providers of care and care team members to identify and obtain the electronic summary of care record. Instead, the measure would focus on the result of these actions when an electronic summary of care record is successfully identified, received, and reconciled with the patient record.
- 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).
- 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 decision support.

- Eligible hospitals and CAHs may use any document template within the C-CDA standard for purposes of the measures under the Health Information Exchange objective.
- Actions included in the numerator must occur within the self-selected EHR reporting period.
- For the measure, only patients whose records are maintained using CEHRT must be included in the denominator for transitions of care.
- For the measure, if no update is necessary, the process of reconciliation may consist of simply verifying that fact or reviewing a record received on referral and determining that such information is merely duplicative of existing information in the patient record.

## Regulatory References

- For further discussion, please see [83 FR 41634 through 41677](#) and [84 FR 42597](#).
- In order to meet this measure, an eligible hospital or CAH must use technology certified to the criteria at 45 CFR 170.315 (b)(1) and (b)(2).

## Certification Criteria

Below are the corresponding certification criteria for EHR technology that support this measure.

Certification Criteria
<a href="#">§170.315 (b)(1) Transitions of care</a>
<a href="#">§170.315 (b)(2) Clinical information reconciliation and incorporation</a>