

# Stage 3 Proposed Rule - Meaningful Use

## Public Health Measures



# Public Health and Clinical Data Registry Reporting



- **Proposed Objective:** The EP, EH, or CAH is in active engagement with a Public Health Agency or Clinical Data Registry to submit public health data using certified EHR technology, except where prohibited.
- Removing "ongoing submission" and replacing with "active engagement:". There are 3 ways to demonstrate "active engagement"
  - 1) Completed registration to submit data
  - 2) Testing and validation
  - 3) Production
- Case Reporting – new term & measure for reportable diseases or conditions, such as cancer (EP only)
- EPs – must attest to 3 out of 5 possible measures
- EH/CAHs – must attest to 4 out of 6 possible measures
- Exclusions – are specific to the measures



# Proposed Objective 8: Public Health and Clinical Data Registry Reporting



## PROPOSED MEASURE(S)

**Proposed Measures:** CMS proposes a total of 6 possible measures for this objective.

- **EPs:** Attest to 3 measures from measures 1-5.
- **EHS:** Attest to 4 measures from measures 1-6.

- **Active Engagement Option 1: Completed Registration to Submit Data** *(within 60 days after the start of the EHR reporting period)*
- **Active Engagement Option 2: Testing and Validation** *(30 days to respond to PHA/CDR: fail to respond 2x, don't meet the measure)*
- **Active Engagement Option 3: Production** *(electronically submitting production data to PHA/CDR)*

*\*Attestation Only*

MEASURE	MAX TIMES MEASURE CAN COUNT FOR EP	MAX TIMES MEASURE CAN COUNT FOR EH
1- Immunization Reporting	1	1
2- Syndromic Surveillance Reporting	1	1
3- Case Reporting	1	1
4- Public Health Registry Reporting*	3	4
5- Clinical Data Reporting	3	4
6- Electronic Reportable Laboratory Results	N/A	1

**\*EPs & EHs can choose to report to more than one registry to meet the number of measures required to meet the objective**



# Concerns

- Changing the rules in the middle of the game
- More of the same – focusing on multiple specific ‘measures’ rather than the big picture (and organizational priorities)
- Pushing the envelope beyond what ‘required partners’ can do