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 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

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