

### Guidance to Eligible Professionals on the Public Health Specialized Case Registry Option for Medicaid EHR Incentive Program Meaningful Use Applications Program Years 2015 - 2017

In order to meet the “Specialized Case Registry” option of the Meaningful Use Public Health Measure, an EP must demonstrate “active engagement to submit data to a specialized registry, or appropriately claim an exclusion from the measure” (see 42 CFR 495.22 (e)(10)(B)(3)). Currently, the State of Connecticut’s public health agency, the Department of Public Health, does not operate any specialized case registries. EPs are required, however, to determine if there is another specialized registry available to them, or if they meet exclusion criteria for this measure.

For the purposes of the Electronic Health Record Incentive Program, **a specialized case registry can count towards the public health option if the registry has the following qualities:**

1. Has **declared that it is ready to accept data as a specialized registry** and will be using data to improve population health outcomes. (CMS FAQ 13653)
2. **Is able to receive electronic data generated from Certified Electronic Health Record Technology (CEHRT)**. Per CMS, “Manual data entry into a web portal would not qualify for submission to a specialized registry. The electronic file can be sent through any appropriately secure mechanism including, but not limited to, a secure upload function on a web portal, sFTP, or Direct. (CMS FAQ 13653)
3. **Must be able to provide supporting documentation to EPs** that is related to demonstrating how the EP actively engaged with the specialized case registry. (CMS FAQ 13653)
4. For qualified clinical data registries, reporting to a QCDR may count for the public health specialized registry measure **as long as the submission to the registry is not only for the purposes of meeting CQM requirements for PQRS or the EHR Incentive Programs**. In other words, the submission may count if the registry is also using the data for a public health purpose. Many QCDRs use the data for a public health purpose beyond CQM reporting to CMS. A submission to such a registry would meet the requirement for the measure if the submission data is derived for CEHRT and transmitted electronically.

#### Steps EPs need to take to determine if a Specialized Case Registry is Available to Them or If They Should Claim Exclusion:

**Step 1:** An EP must check with any specialty society with which they are affiliated to determine if the society maintains or endorses a specialized registry.

**If there is no specialized registry endorsed by their specialty society, the EP may exclude from the measure.** The EP should save any documentation of their affiliation with the specialty society for pre and post payment audit purposes. DSS may examine if the specialty society does or does not maintain or endorse a specialized case registry to determine the appropriateness of the exclusion taken.

**Step 2:** If the specialty society maintains or endorses a specialized registry, the EPs need to determine if it meets three qualities of a specialized registry.

**If the specialized case registry does not meet the three qualities of a specialized case registry listed above, the EP may exclude from the measure.** The EP should save any documentation of their affiliation with the specialty society and any information regarding the specialized case registry. DSS may examine if the specialty society’s registry does or does not meet the three qualities of a specialized case registry.

**Key Words for Cataloging:** Specialized Case Registry, Public Health Measure

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Date Posted by HP: 12/21/2016

**Step 3:** If the specialty society maintains or endorses a specialized registry and meets the three qualities of a specialized registry, the EP is required to demonstrate active engagement with the registry. EPs may demonstrate active engagement by completing any of the following options:

1. **Completed Registration to Submit Data:** The EP registered to submit data. Registration was completed within 60 days after the start of the EHR reporting period; and the EP is awaiting an invitation to begin testing and validation.
2. **Testing and Validation:** The EP is in the process of testing and validation of the electronic submission of data. EPs must respond to requests from the clinical data registry (CDR) within 30 days; failure to respond twice within an EHR reporting period would result in that the provider not meeting the measure.
3. **Production:** The EP has completed testing and validation of the electronic submission and is electronically submitting production data to the CDR.

The EP will need to upload any supporting documents into the CT Medical Assistance Provider Incentive Repository (MAPIR) attestation verifying their active engagement with the specialized case registry during the EHR Reporting Period.

### **Guidance for Program Year 2015**

In addition to the steps EPs take to determine if exclusion is appropriate for Program Year 2015, EPs can claim an alternate exclusion for the specialized case registry measure option. The alternate exclusion is available if the EP did not intend to attest to this prior menu objective before the new regulations took effect on December 15, 2015. (CMS FAQ 12985)

### **Guidance for Program Year 2016**

**\*CORRECTION** EPs may claim an alternate exclusion for the specialized case registry measure option for an EHR reporting period in 2016. (2016 EP Specification Sheets)

### **Guidance for Program Year 2017**

**\*UPDATE** The alternate exclusion is not available for Program Year 2017. EPs will need to go through the outlined steps to determine if they need to engage with the specialized registry or exclude. (2017 EP Specification Sheets)

### **For more information on alternative measures and exclusions, please visit:**

What Can Count as a Specialized Registry?

FAQ #13653 - <https://questions.cms.gov/faq.php?faqId=13653&id=5005>

Steps Providers Take to determine if there is a Specialized Registry Available to Them

FAQ #13657 - <https://questions.cms.gov/faq.php?faqId=13657&id=5005>

Alternative Exclusions for Program Year 2015

FAQ # 12985 - <https://questions.cms.gov/faq.php?id=5005&faqId=12985>

#### **2016 Public Health Reporting Specification Sheet for PY2016**

[https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Downloads/2016EP\\_10PublicHealthObjective.pdf](https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Downloads/2016EP_10PublicHealthObjective.pdf)

#### **2017 Public Health Reporting Specification Sheet for PY2017**

[https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Downloads/MedicaidEPStage2\\_Obj10.pdf](https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Downloads/MedicaidEPStage2_Obj10.pdf)