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Connecticut Eligible Professionals and Hospitals:

This is an update regarding public health reporting for Meaningful Use (MU) for Eligible Hospitals (EHs) and Eligible Professionals (EPs) attesting to the Medicare and Medicaid EHR Incentive Program for **Program Year 2015** following regulatory changes made by Centers for Medicare and Medicaid Services (CMS). Specifically, this letter provides guidance that applies to the Medicaid EHR Incentive program that is effective December 15, 2015, pursuant to the CMS Final Rule published October 16, 2015. The prior regulations and guidance reflected in the July 9, 2015 DPH letter apply to any EP or EH who attested to the Medicaid EHR Incentive Program prior to December 15, 2015.

The EHR Incentive program reporting objectives and requirements were recently changed by CMS. There is no longer a distinction between Stage 1 and Stage 2 program status. Going forward, for 2015 through 2017 program years, all EHs and EPs will now attest based on the "Modified Stage 2" requirements.

Pursuant to new CMS regulations, and as part of "Modified Stage 2," there are new changes to public health reporting requirements. Effective December 15, 2015, EPs or EHs must demonstrate "active engagement" to electronically submit data pertaining to public health measures from Certified Electronic Health Record Technology (CEHRT) except where prohibited and in accordance with applicable law and practice. Under CMS regulations, "active engagement" means completion of applicable registration processes to submit such data, testing and validation in preparation of such submission, or active submission of public health production data.

There are now four public health reporting options for EHs, and three for EPs, with several possible exclusions to meet the overall public health measure. There are general criteria-based exclusions, and also [alternate exclusions](#) that may apply based on the stage to which an EH or EP was intending to attest prior to the rule change for Program Year 2015. (Please see CMS guidance Program Year 2015 for [EPs](#) and for [EHs](#).) Many of the exclusions depend on whether the designated public health authority in the EHs or EPs state have available reporting systems, as well as the readiness of such systems.

The following is a summary of the Department of Public Health's (DPH) current status to the **public health measure options and relevant reporting guidance for the EHR Incentive Program Year 2015:**

Immunization Registry for Program Year 2015:

Eligible Professionals: EPs can satisfy the Testing and Validation definition of active engagement for immunization reporting by having submitted test immunization data in the MUST Portal by December 31, 2015 and generating a MUST Portal certificate during the EHR reporting period. The Certificate must be uploaded into the DSS Medicaid MAPIR Attestation System for each EP completing an attestation.

One MUST Portal Certificate can be utilized per practice group if the Certificate is completed during each individual EP's EHR Reporting Period.

EPs who did not administer immunizations during the relevant reporting period may claim exclusion for this measure.

Eligible Hospitals: As described for EPs above, EHs can satisfy the Testing and Validation definition of active engagement for immunization reporting by having submitted test immunization data in the MUST Portal and generating a MUST Portal certificate during the EHR reporting period.

Electronic Laboratory Reporting (ELR) for Program Year 2015:

Eligible Professionals: EPs are not required to report on or attest to this public health measure option.

Eligible Hospitals: DPH had not fully operationalized the ELR system for Program Year 2015. **EHs must exclude from the measure** based upon the criteria that EHs "Operates in a jurisdiction where no public health agency has declared readiness to receive electronic reportable laboratory results from eligible hospitals or CAHs at the start of the EHR reporting period." 42 CFR § 495.22 (e)(10)(ii)(C)(4)(iii).

Syndromic Surveillance System for Program Year 2015:

Eligible Hospitals and Eligible Professionals: DPH does not have the capability to accept syndromic surveillance data in a MU-compliant manner at this time. **All EHs and EPs must exclude from the measure** based upon the criteria that EPs and EHs "Operate in a jurisdiction for which no public health agency is capable of receiving electronic syndromic surveillance data from EPs or EHs in the specific standards required to meet the CEHRT definition at the start of the EHR Reporting Period." 42 CFR § 495.22(e)(10)(i)(B)(2)(ii) and 42 CFR § 495.22 (e)(10)(i)(C)(2)(ii) and 42 CFR § 495.22 (e)(10)(ii)(C)(2)(ii).

Specialized Case Registry System

Eligible Hospitals and Eligible Professionals: DPH, as the Public Health Agency, does not operate or have the capability to accept specialized case registry electronic data. However, CMS regulation states that Specialized Case Registries are not limited to endorsement by the public health agency. CMS has released two responses to Frequently Asked Questions regarding Specialized Case Registries which can be found [here](#) and [here](#).

Eligible Professionals: Specific steps are to be utilized by EPs to determine if they need to attest or can appropriately exclude from the measure option. EPs may take an alternate exclusion to this measure. [Please reference DSS Guidance for EPs here.](#)

Eligible Hospitals: CMS and ONC have not issued additional guidance to support EHs on appropriately attesting from the measure at the time of this letter's publication. Additional guidance will be forwarded on by the Department of Social Services once it becomes available. EHs may take an alternate exclusion to this measure. 42 CFR 495.22 (e)(10)(ii)(C)(3); CMS FAQ 12985.

The Department of Public Health encourages you to frequently check its Meaningful Use Website link to obtain timely updates and learn more about DPH's public health reporting statuses applicable to MU. Please visit the [Department of Public Health's Meaningful Use Website.](#)

For further guidance on the additional **Medicaid** MU Requirements and the **Medicaid** Attestation process, please visit the Department of Social Services' [Medicaid EHR Incentive Program website](#).

EHRs and EPs may also call the state's toll free help line at 1-855-313-6638, or email Department of Social Services Medicaid EHR Incentive Program at ctmedicaid-ehr@hpe.com.

To receive Important Messages and Program Updates from the DSS Medicaid EHR Incentive Program, please subscribe to the EHR Incentive Program Topic at the [CT Medical Assistance Program Email Subscription Website](#).

For further guidance on the **Medicare** requirements and **Medicare** attestation process, please visit CMS at <https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/index.html?redirect=/ehrincentiveprograms>

Sincerely,



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