Key Information

- Proposes changes to the Stage 1 and Stage 2 public health and specialty registry objectives to consolidate the prior objectives and measures into a single objective (Objective #8: Public Health and Clinical Data Registry Reporting) in alignment with efforts to streamline the program and support flexibility for providers.
- To better and more accurately capture the diverse ways that providers can electronically exchange data with Public Health Agencies (PHAs) and Clinical Data Registries (CDRs), includes a new measure for case reporting and proposes removing the prior "ongoing submission" requirement and replacing it with an "active engagement" requirement with three options.
- Uses new terms such as public health registries and clinical data registries to incorporate the Stage 2 designations for cancer registries and specialized registries under these categories which are used in the health care industry to designate a broader range of registry types.
- Of the six possible proposed measures for Objective #8, Eligible Providers (EPs) would be required to choose from measures 1 through 5, and would be required to successfully attest to any combination of three measures; Eligible Hospitals (EHs) and Critical Access Hospitals (CAHs) would be required to choose from measures one through six, and would be required to successfully attest to any combination of four measures.
Overview & Key Changes

This objective builds on the requirements in the Stage 2 final rule. In addition, this objective
– includes improvements to the Stage 2 measures,
– supports innovation that has occurred since the Stage 2 rule was released, and
– adds flexibility in the options that an eligible provider has to successfully report.

Further, this objective places increased focus on the importance of the ongoing lines of communication that should exist between providers and public health agencies (PHAs) or, between providers and clinical data registries (CDRs). Providers' use of certified EHR technology can increase the flow of secure health information and reduce the burden that otherwise could attach to these important communications.

The purpose of this Stage 3 objective is to further advance communication between providers and PHAs or CDRs, as well as strengthen the capture and transmission of such health information within the care continuum.

Objective and Measures

Proposed Objective 8: Public Health and Clinical Data Registry Reporting

The proposed objective requires the EP, eligible hospital, or CAH to be in an “active engagement” with a PHA or CDR to submit electronic public health data in a meaningful way using certified EHR technology, except where prohibited, and in accordance with applicable law and practice.

For purposes of meeting this new objective, “active engagement” means that the provider is in the process of moving towards sending "production data" to a PHA or CDR, or— is sending production data to a PHA or CDR. This may be met using one of three options.

Active Engagement Option 1 – Completed Registration to Submit Data
- The EP, eligible hospital, or CAH is registered to submit data with the PHA or, the CDR to which the information is being submitted; registration was completed within 60 days after the start of the EHR reporting period; and the EP, eligible hospital, or CAH is awaiting an invitation from the PHA or CDR to begin testing and validation.

Active Engagement Option 2 – Testing and Validation
- The EP, eligible hospital, or CAH is in the process of testing and validation of the electronic submission of data. Providers must respond to requests from the PHA or, where applicable, the CDR within 30 days; failure to respond twice within an EHR reporting period would result in that provider not meeting the measure.

Active Engagement Option 3 – Production
- The EP, eligible hospital, or CAH has completed testing and validation of the electronic submission and is electronically submitting production data to the PHA or CDR.
Proposed Measures

CMS is proposing a total of six possible measures for this objective.
- EPs would be required to choose from measures 1 through 5, and would be required to successfully attest to any combination of 3 measures.
- Eligible hospitals and CAHs would be required to choose from measures 1 through 6, and would be required to successfully attest to any combination of 4 measures.
- Measures 4 and 5 for Public Health Registry Reporting and Clinical Data Registry Reporting may be counted more than once if more than one Public Health Registry or Clinical Data Registry is available.

The measures are as shown in Table 1, and include:
- **Measure 1**—Immunization Registry Reporting
- **Measure 2**—Syndromic Surveillance Reporting
- **Measure 3**—Syndromic Surveillance Reporting
- **Measure 4**—Case Reporting
- **Measure 5**—Clinical Data Registry Reporting
- **Measure 6**—Electronic Reportable Laboratory Results

Exclusions

EPs, EHs, and CAHs may be excluded from meeting a specific measure if one of several criteria is met.

Broadly, those exclusions include when
- during the EHR reporting period, the EP, EH, or CAH does not diagnose or directly treat any disease or condition for which data are collected by a specified reporting system in their jurisdiction; or
- at the start of EHR reporting period, an EP, EH, or CAH operates in a jurisdiction for which no public health agency or clinical registry is capable of receiving reported data the specific standards required to meet the CEHRT definition, or if public health agency or clinical registry has not declared readiness to that data from EPs, EHs / CAHs.

Conclusion

Table 1 provides a matrix to help you understand the newly aligned measures, its exclusions, and the potential mix of measures to meet if you are an EP or EH / CAH.

*Note: Public comments on the proposed rule are due to CMS on May 29, 2015.*
Table 1. Summary Chart of Objective 8: Public Health and Clinical Data Registry Reporting

<table>
<thead>
<tr>
<th>Proposed Measure</th>
<th>Description</th>
<th>Exclusions</th>
<th>Maximum times measure can count towards objective</th>
</tr>
</thead>
</table>
| #1 – Immunization Registry Reporting | …submit immunization data and receive immunization forecasts and histories from the public health immunization registry/immunization information system (IIS). | EPs: Meeting 1 or more criteria:  
- during the EHR reporting period, no immunizations are administered to the population covered in the registry/IIS  
- at the end of EHR reporting period, operates in a jurisdiction where no registry/IIS  
  o is capable of accepting the specific standards required to meet the CEHRT definition, or  
  o has declared readiness to receive immunization data. | EPs: 1 |
| #2 – Syndromic Surveillance Reporting | …submit syndromic surveillance data from a non-urgent care ambulatory setting for EPs, or an emergency or urgent care department for eligible hospitals and CAHs (POS 23). | EPs: Meeting 1 or more criteria:  
- does not diagnose / treat any disease / condition associated with a syndromic surveillance system in their jurisdiction;  
- at the start of EHR reporting period, operates in a jurisdiction for which no public health agency  
  o is capable of receiving electronic syndromic surveillance data from EPs in the specific standards required to meet the CEHRT definition, or  
  o has declared readiness to receive syndromic surveillance data from EPs.  
EHs/CAHs: Meeting 1 or more criteria:  
- does not have an emergency or urgent care department;  
- at the start of EHR reporting period, operates in a jurisdiction for which no public health agency  
  o is capable of receiving electronic syndromic surveillance data from EHs/CAHs in the specific standards required to meet the CEHRT definition, or  
  o has declared readiness to receive syndromic surveillance data from EHs/CAHs. | EHs/CAH: 1 |
| #3 – Case Reporting | …submit case reporting of reportable conditions. | EPs: Meeting 1 or more criteria:  
- during the EHR reporting period, does not diagnose / treat any disease / any reportable disease which data are collected by a reportable disease system in their jurisdiction;  
- at the start of EHR reporting period, operates in a jurisdiction for which no public health agency  
  o is capable of receiving electronic case reporting data in the specific standards required to meet the CEHRT definition, or  
  o has declared readiness to receive electronic case reporting data.  
EHs/CAHs: Same as above | EHs/CAH: 1 |
| #4 – Public Health | …submit data to public health registries. | EPs: Meeting 1 or more criteria:  
- during the EHR reporting period, does not diagnose / treat any disease / any reportable disease which data are collected by a reportable disease system in their jurisdiction;  
- at the start of EHR reporting period, operates in a jurisdiction for which no public health agency  
  o is capable of receiving electronic case reporting data in the specific standards required to meet the CEHRT definition, or  
  o has declared readiness to receive electronic case reporting data. | EPs: 3 |
<table>
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</tr>
</thead>
</table>
| Registry Reporting* | The EP, EH, or CAH is in active engagement with a public health agency to… | - condition associated with a public health registry in their jurisdiction;  
  - at the start of EHR reporting period, operates in a jurisdiction for which no public health agency  
    - is capable of accepting electronic registry transactions in the specific standards required to meet the CEHRT definition, or  
    - has declared readiness to receive electronic registry transactions. | EHs/CAHs: Same as above |
| #5 – Clinical Data Registry Reporting** | The EP, EH, or CAH is in active engagement with a public health agency to submit data to a clinical data registry. | EPs: Meeting 1 or more criteria:  
  - during the EHR reporting period, does not diagnose / treat any disease / condition associated with a clinical data registry in their jurisdiction;  
  - at the start of EHR reporting period, operates in a jurisdiction for which no clinical data registry  
    - is capable of accepting electronic registry transactions in the specific standards required to meet the CEHRT definition, or  
    - has declared readiness to receive electronic registry transactions. | EPs: |
| #6 – Electronic Reportable Laboratory Results | The EP, EH, or CAH is in active engagement with a public health agency electronic reportable laboratory results. | EPs: Meeting 1 or more criteria:  
  - during the EHR reporting period, does not perform or order laboratory tests that are reportable in their jurisdiction;  
  - at the start of EHR reporting period, operates in a jurisdiction for which no public health agency  
    - is capable of accepting the specific ELR standards required to meet the CEHRT definition, or  
    - has declared readiness to receive electronic reportable laboratory. | EPs: |

* EPs, eligible hospitals, and CAHs may choose to report to more than one public health registry to meet the number of measures required to meet the objective.

** EPs, eligible hospitals, and CAHs may choose to report to more than one clinical data registry to meet the number of measures required to meet the objective.