

# ESSENTIALS FOR HEALTH REFORM: Using Networks to Implement and Improve EHRs and other HIT



NATIONAL COUNCIL  
FOR COMMUNITY BEHAVIORAL HEALTHCARE

**Behavioral Health providers are being challenged to adopt health information technology with very limited resources. There is a need to prepare for increased numbers of patients receiving health insurance benefits, requirements for electronic billing, data exchange among treating providers and an ever increasing need to collect and use health information to improve care.**

**These intense one day seminars will provide attendees with the necessary information to move forward in adopting, acquiring and implementing electronic health records and other health information technology. Presenters will review the various stages of implementation from initial planning and assessment through advanced topics such as data warehousing. There will be a focus on utilizing networks of care to build on economies of scale. Participants will leave with a thorough understanding of where they are in the process, and a plan for next steps in their health information technology implementation efforts.**

**These seminars are a collaborative work of NIATx, SAAS and The National Council supported by SAMHSA.**

## **Topics include:**

- **Overview of the CMS Rule on Medicare and Medicaid Incentive Payments**
- **Practice Management Systems vs EHRs**
- **Benefits & Economies of Scale when working with a Network**
- **HIT Planning and Assessment Process**
- **HIT Workflow Redesign**
- **Due Diligence and Vendor Negotiations**
- **EHR Selection and Implementation**
- **Disaster Recovery and Business Continuity Planning**
- **Data Warehousing**
- **Use of Telemedicine**
- **Health Information Exchange and Behavioral Health**

# **Overview of CMS Final Rule On EHR Adoption**

## **American Recovery and Reinvestment Act (ARRA) (Pub. L. 111-5)**

- **Enacted February 17, 2009**
  
- **Modernize nation's infrastructure**
- **Enhance energy independence**
- **Expand educational opportunities**
- **Provide tax relief, and**
- **Preserve and improve affordable health care**
  
- **Title IV of Division B of ARRA**
  - **Amends Titles XVIII and XIX of the Social Security Act**
    - **Established incentive payments to eligible professionals (EPs) to promote**
      - **Adoption and**
      - **Meaningful Use of Interoperable health information technology**
  
- **Together with Title XIII of Division A of ARRA =**
  - **Health Information Technology for Economic and Clinical Health or the HITECH Act**

- **CMS Final Rule Initial Release on July 13, 2010**
  - **Federal Register July 28, 2010**
  
- **ONC also published a related Rule**
  - **Health Information Technology: Initial Set of Standards, Implementation Specifications, and Certification Criteria for Electronic Health Record Technology**
    - **Governs the Establishment of Certification Programs for Health Information Technology**
    - **<http://www.nachc.com/meaningfuluseofhit.cfm>**

- ***HHS Ultimate Goal***
  - ***Reform the health care system***
  - ***Improve***
    - ***Health care quality***
    - ***Efficiency***
    - ***Patient Safety***

## ➤ **Requirements for “Meaningful Use”**

- **Demonstrates Meaningful Use of Certified EHR technology in a meaningful manner**
  - **E.g. electronic prescribing**
  
- **The certified technology is**
  - **Connected in a manner that provides for**
    - **Electronic exchange of health information to**
      - **Improve quality care**
  
- **In using the certified EHR technology**
  - **Provider submits to the Secretary information on**
    - **Clinical Quality Measures**
    - **Other measures selected by the Secretary**
      - **For Medicaid EPs to the States**



## ➤ **Staged Approach**

### ➤ **Stage 1 Focus**

- **Capture information in a structured format**
- **Using the information to track key clinical conditions**
- **Communicating the information for Care Coordination Purposes**
- **Implementing Clinical Decision Support Tools to**
  - **Facilitate Disease and Medication Management**
- **Use EHRs to Engage Patients and Families**
- **Reporting Clinical Quality Measures and Public Health Reporting States**

- **Focuses on functionalities that will allow for**
  - **Continuous Quality Improvement**
  - **Ease of Information Exchange**

## ➤ **Requirements for “Meaningful Use”**

- **Use of EHR technology in a meaningful manner**
  - **E.g. electronic prescribing**
  
- **The certified technology is**
  - **Connected in a manner that provides for**
    - **Electronic exchange of health information to**
      - **Improve quality care**
  
- **In using the certified EHR technology**
  - **Provider submits to the Secretary information on**
    - **Clinical Quality Measures**
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      - **For Medicaid EPs to the States**

## ➤ **Definitions of “Qualified EHR Technology”**

➤ **A Qualified EHR must be applicable to the type of practice**

➤ **E.g. ambulatory EHR for office based physicians**

➤ **An electronic record of health information on an individual that includes:**

➤ **Patient demographics**

➤ **Clinical health Information**

➤ **Medical History**

➤ **Problem lists**

➤ **Has capacity to**

➤ **Provide clinical decision support**

➤ **Support physician order entry**

➤ **Capture and query information relevant to health care quality**

➤ **Exchange electronic health information**

➤ **Integrate such information from other sources**

# Three Stages of “Meaningful Use”

## Staged Approach

### ○ Stage 1 Focus

- **Capture information in a structured format**
- **Using the information to track key clinical conditions**
- **Communicating the information for Care Coordination Purposes**
- **Implementing Clinical Decision Support Tools to**
  - » **Facilitate Disease and Medication Management**
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- **Reporting Clinical Quality Measures and Public Health Reporting States**

# Eligible Professionals (EPs) in Behavioral Health Organizations

- **Psychiatrists and other physicians in your organization**
  - **Eligible for Medicaid or Medicare Incentives**
- **Nurse Practitioners**
  - **Eligible for Medicaid**

# Incentive Payments

## Payments to Medicaid EPs:

- **Maximum of 85% of \$75,000 over 6 years**
  - **85% of \$25,000 1<sup>st</sup> year (\$21,250)**
    - » **Adopting, Implementing or Upgrading**
  - **85% of \$10,000 years 2 - 6 (\$8,500)**
    - » **Demonstrating “Meaningful Use”**

**Total \$63,750**

- **Must begin receiving incentive payments no later than CY 2016**

Calendar Year	Medicaid EPs who begin adoption in					
	2011	2012	2013	2014	2015	2016
2011	\$21,250	-----	-----	-----	-----	-----
2012	\$8,500	\$21,250	-----	-----	-----	-----
2013	\$8,500	\$8,500	\$21,250	-----	-----	-----
2014	\$8,500	\$8,500	\$8,500	\$21,250		
2015	\$8,500	\$8,500	\$8,500	\$8,500	\$21,250	
2016	\$8,500	\$8,500	\$8,500	\$8,500	\$8,500	\$21,250
2017	-----	\$8,500	\$8,500	\$8,500	\$8,500	\$8,500
2018	-----	-----	\$8,500	\$8,500	\$8,500	\$8,500
2019	-----	-----	-----	\$8,500	\$8,500	\$8,500
2020	-----	-----	-----	-----	\$8,500	\$8,500
2021						\$8,500
<b>TOTAL</b>	<b>\$63,750</b>	<b>\$63,750</b>	<b>\$63,750</b>	<b>\$63,750</b>	<b>\$63,750</b>	<b>\$63,750</b>



Calendar Year	Medicare EPs who begin adoption in					
	2011	2012	2013	2014	2015	2016
2011	\$18,000	-----	-----	-----	-----	-----
2012	\$12,000	\$18,000	-----	-----	-----	-----
2013	\$8,000	\$12,000	\$15,000	-----	-----	-----
2014	\$4,000	\$8,000	\$12,000	\$12,000	-----	-----
2015	\$2,000	\$4,000	\$8,000	\$8,000	-----	-----
2016	-----	\$2,000	\$4,000	\$4,000	-----	-----
2017	-----	-----	-----	-----	-----	-----
2018	-----	-----	-----	-----	-----	-----
2019	-----	-----	-----	-----	-----	-----
2020	-----	-----	-----	-----	-----	-----
2021	-----	-----	-----	-----	-----	-----
<b>TOTAL</b>	<b>\$44,000</b>	<b>\$44,000</b>	<b>\$39,000</b>	<b>\$24,000</b>	-----	-----

# Definitions of Adopting, Implementing or Upgrading EHR Technology

## Attest to

- “Adopted” = Having Acquired, Purchased or Secured
- “Implemented” = Install or Commenced utilization
- “Upgraded” = Expanded the available functionality

## Implementing and Upgrading includes

- Staffing, Maintenance & Training
- Upgrading from an existing system to one that is “Certified”

## States must establish a verification process

- Submission of a vendor contract is recommended by CMS as one means of verification

# Functional Measures

## Objectives for the Core Set of Functional Measures

- Use CPOE (any licensed healthcare professional per state guidelines)
- Implement drug to drug and drug allergy interaction checks
- E-Prescribing (EP only)
- Record demographics
- Maintain an up-to-date problem list
- Maintain active medication list
- Maintain active medication allergy list
- Record and chart changes in vital signs
- Record smoking status
- Implement one clinical decision support rule
- Report CQM as specified by the Secretary
- Electronically exchange key clinical information
- Provide patients with an electronic copy of their health information
- Provide patients with an electronic copy of their discharge instructions (Eligible Hospital/CAH Only)
- Provide clinical summaries for patients for each office visit (EP Only)
- Protect electronic health information created or maintained by certified EHRs

**Must choose one of the population & public health measures**

## CORE SET

### Stage 1 Objectives

Health Outcomes  
Policy Priority

Eligible Professionals

Stage 1 Measures

Improving  
quality, safety,  
efficiency, and  
reducing health  
disparities

Use CPOE for medication  
orders directly entered by any  
licensed healthcare  
professional who can enter  
orders into the medical record  
per state, local and  
professional guidelines

More than 30% of unique  
patients with at least one  
medication in their  
medication list seen by the  
EP or admitted to the  
eligible hospital's or  
CAH's inpatient or  
emergency department  
(POS 21 or 23) have at  
least one medication order  
entered using CPOE

## CORE SET

CORE SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
Improving quality, safety, efficiency, and reducing health disparities	Implement drug-drug and drug-allergy interaction checks  Requires only a Yes/No Attestation	The EP/eligible hospital/CAH has enabled this functionality for the entire EHR reporting period
	Generate and transmit permissible prescriptions electronically (eRX)	More than 40% of all permissible prescriptions written by the EP are transmitted electronically using certified EHR technology

## CORE SET

CORE SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
<p style="text-align: center;">Improving quality, safety, efficiency, and reducing health disparities</p>	<p>Record demographics</p> <ul style="list-style-type: none"> <li>○ preferred language</li> <li>○ gender</li> <li>○ race</li> <li>○ ethnicity</li> <li>○ date of birth</li> </ul>	<p style="text-align: center;">More than 50% of all unique patients seen by the EP or admitted to the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23) have demographics recorded as structured data</p>
	<p>Maintain an up-to-date problem list of current and active diagnoses</p>	<p style="text-align: center;">More than 80% of all unique patients seen by the EP or admitted to the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23) have at least one entry or an indication that no problems are known for the patient recorded as structured data</p>

## CORE SET

CORE SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
Improving quality, safety, efficiency, and reducing health disparities	Maintain active medication list	More than 80% of all unique patients seen by the EP or admitted to the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23) have at least one entry (or an indication that the patient is not currently prescribed any medication) recorded as structured data
	Maintain active medication allergy list	More than 80% of all unique patients seen by the EP or admitted to the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23) have at least one entry (or an indication that the patient has no known medication allergies) recorded as structured data

## CORE SET

CORE SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
<p style="text-align: center;">Improving quality, safety, efficiency, and reducing health disparities</p>	<p style="text-align: center;">Record and chart changes in vital signs</p> <ul style="list-style-type: none"> <li>○ Height</li> <li>○ Weight</li> <li>○ Blood pressure</li> <li>○ Calculate and display BMI</li> <li>○ Plot and display growth charts for children 2-20 years, including BMI</li> </ul>	<p style="text-align: center;">More than 50% of all unique patients age 2 and over seen by the EP or admitted to the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23), height, weight and blood pressure are recorded as structured data</p>
	<p style="text-align: center;">Record smoking status for patients 13 years old or older</p>	<p style="text-align: center;">More than 50% of all unique patients 13 years old or older seen by the EP or admitted to the eligible hospital's or CAH's inpatient or emergency department (POS 21 or 23) have smoking status recorded as structured data</p>



## CORE SET

CORE SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
<p>Improving quality, safety, efficiency, and reducing health disparities</p>	<p>Implement one clinical decision support rule relevant to specialth or high clinical priority along with the ability to track compliance that rule</p> <p style="text-align: center;">Reauires only a Yes/No Attestation</p>	<p>Implement one clinical decision support rule</p>
	<p><b>Report ambulatory clinical quality measures to CMS or the States</b></p> <p>**Not applicable for most Medicaid eligible providers as they will meet requirements under adoption, implementation or upgrading in 2011**</p>	<p>For 2011, provide aggregate numerator, denominator, and exclusions through attestation as discussed in section II (A)(3) of this final rule</p> <p>For 2012, electronically submit the clinical quality measures as discussed in section II(A)(3) of this final rule</p>

## CORE SET

CORE SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
Engage patients and families in their health care	<p style="text-align: center;">Provide patients with an electronic copy of their health information (including diagnostic test results, problem list, medication lists, medication allergies), upon Request</p> <p style="text-align: center;">Within 3 business days pg.161</p>	<p style="text-align: center;">More than 50% of all unique patients of the EP or admitted to the eligible hospital's or CAH (POS 21 or 23) who request an electronic copy of their health information are provided it within 3 business days</p>
	<p style="text-align: center;">Provide clinical summaries for patients for each office visit</p> <p style="text-align: center;">Within 3 business days pg.178</p>	<p style="text-align: center;">clinical summaries provided to patients for more than 50% of all office visits within 3 business days</p>

## CORE SET

CORE SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
Improve care coordination	<p>Capability to exchange key clinical information (for example, problem list, medication list, medication allergies, diagnostic test results), among providers of care and patient authorized entities electronically</p> <p>Requires Only a Yes/No Attestation</p>	<p>Performed at least one test of certified EHR technology's capacity to electronically exchange key clinical information</p> <p>From EHR to EHR or through an HIE pg.186. Must be different legal entities with distinct EHRs pg. 191</p>
Ensure adequate privacy and security protections for personal health information	<p>Protect electronic health information created or maintained by the certified EHR technology through the implementation of appropriate technical capabilities</p> <p>Requires Only a Yes/No Attestation</p>	<p>Conduct or review a security risk analysis per 45 CFR 164.308 (a)(1) and implement security updates as necessary and correct identified security deficiencies as part of its risk management process</p>

## MENU SET

MENU SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
Improving quality, safety, efficiency, and reducing health disparities	Implement drug formulary checks  Requires only a Yes/No Attestation	The EP/eligible hospital/CAH has enabled this functionality and has access to at least one internal or external drug formulary for the entire EHR reporting period
	Incorporate clinical lab test results into certified EHR technology as structured data	More than 40% of all clinical lab tests results ordered by the EP ...during the EHR reporting period whose results are either in a positive/negative or numerical format are incorporated in certified EHR technology as structured data

## MENU SET

MENU SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
Improving quality, safety, efficiency, and reducing health disparities	<p style="text-align: center;">Generate lists of patients by specific conditions to use for quality improvement, reduction of disparities, research or outreach</p> <p style="text-align: center;">Requires only a Yes/No Attestation</p>	<p style="text-align: center;">Generate at least one report listing patients of the EP, eligible hospital or CAH with a specific condition</p>
	<p style="text-align: center;">Send reminders to patients per patient preference for preventive/follow up care</p>	<p style="text-align: center;">More than 20% of all unique patients 65 years or older or 5 years old or younger were sent an appropriate reminder during the EHR reporting period</p>

## MENU SET

MENU SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
Engage patients and families in their health care	<p style="text-align: center;">Provide patients with timely electronic access to their health information (including lab results, problem list, medication lists, medication allergies) within four business days of the information being available to the EP</p> <p style="font-size: small;">Within 4 business days pg. 171 &amp; 172 PHR, portal, web site, secure email, USB, CD or paper pg. 179</p>	<p style="text-align: center;">More than 10% of all unique patients seen the EP are provided timely (available to the patient within four business days of being updated in the certified EHR technology) electronic access to their health information subject to the EP's discretion to withhold certain information</p>
	<p style="text-align: center;">Use certified EHR technology to identify patient-specific education resources and provide those resources to the patient if appropriate</p>	<p style="text-align: center;">More than 10% of all unique patients seen by the EP... are provided patient-specific education resources</p>

## MENU SET

MENU SET		
	Stage 1 Objectives	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
Improve care coordination	<p>The EP, eligible hospital or CAH who receives a patient from another setting of care or provider of care or believes an encounter is relevant should perform medication reconciliation</p> <p style="text-align: center;">Ability to calculate the measure is incorporated into certified EHRs pg. 196</p>	<p>The EP, eligible hospital or CAH performs medication reconciliation for more than 50% of transitions of care in which the patient is transitioned into the care of the EP or admitted to...</p>
	<p>The EP, eligible hospital or CAH who transitions their patient to another setting of care or provider of care or refers their patient to another provider of care should provide summary of care record for each transition of care or referral</p> <p style="text-align: center;">Electronic, via HIE, or paper - must be generated by EHR Pg. 200</p>	<p>The EP, eligible hospital or CAH who transitions or refers their patient to another setting of care or provider of care provides a summary of care record for more than 50% of transitions of care and referrals</p> <p style="text-align: center;">Ability to calculate the measure is incorporated into certified EHRs pg. 201</p>

## MENU SET

MENU SET		
	<b>Stage 1 Objectives</b>	
Health Outcomes Policy Priority	Eligible Professionals	Stage 1 Measures
<p>Improve population and public health</p>	<p>Capability to submit electronic data to immunization registries or Immunization Information Systems and actual submission in accordance with applicable law and practice</p> <p style="text-align: center;">Only applies if performed 1 or more immunizations during reporting period pg. 203</p>	<p style="text-align: center;">Performed at least one test of certified EHR technology's capacity to submit electronic data to immunization registries and follow up submission if the test is successful</p> <p style="text-align: center;">(unless none of the immunization registries to which the EP, ...submits such information have the capacity to receive the information electronically)</p>
	<p>Capability to submit electronic syndromic surveillance data to public health agencies and actual submission in accordance with applicable law and practice</p> <p style="text-align: center;">Requires Only a Yes/No Attestation</p>	<p style="text-align: center;">Performed at least one test of certified EHR technology's capacity to provide electronic syndromic surveillance data to public health agencies and follow-up submission if the test is successful (unless none of the public health agencies to which an EP, ...submits such information have the capacity to receive the information electronically)</p>



# Reporting on Clinical Quality Measures

- > States must identify how they will accept Quality Measures in their HIT Plan
  - Directly or
  - Via Attestation
- > Describe how they will inform EPs of their timeframe to accept submission of Quality Measures

# Quality Measures can be

- > **Process**
- > **Experience**
- > **Outcomes of Patient Care**
- > **Observations or Treatment that relate to other quality aims**
  - **Effective**
  - **Safe**
  - **Efficient**
  - **Patient-Centered**
  - **Equitable and**
  - **Timely Care**

**CMS will seek to align Quality Measures in future rulemaking**

## Core Measures Required for Reporting Table 7 pg. 287

NQF Measure Number & PQRI Implementation Number	Clinical Quality Measure Title
NQF 0013	Title: Hypertension: Blood Pressure Measurement
NQF 0028	Title: Preventive Care and Screening Measure Pair: a. Tobacco Use Assessment b. Tobacco Cessation Intervention
NQF 0421 PQRI 128	Title: Adult Weight Screening and Follow-up
	<i>Alternate Core Measures</i>
NQF 0024	Title: Weight Assessment and Counseling for Children and Adolescents
NQF 0041 PQRI 110	Title: Preventive Care and Screening: Influenza Immunization for Patients ≥ 50Years Old
NQF 0038	Title: Childhood Immunization Status

# Quality Measures

> EPs must report on 6 total Quality Measures

- 3 from previous slide (Table 7)

Or

- The Alternates from previous slide if the first 3 are 0

And

- 3 from the list of 38

**States will determine how attestation will be administered in each state**

# Information Required from EPs

- > EPs must provide
  - Name of EP
  - National Provider Number (NPI)
  - Business Address and phone number
    - Practice address - cannot be a PO Box
  - Taxpayer Identification Number (TIN) to which EPs incentive payment should be made
  - Notify CMS if the EP is choosing the Medicaid or Medicare incentive program
    - EPs allowed to make a one-time switch from one program to the other
  - A medical secretary can register on their behalf
  - EPs are permitted to reassign their incentive payments to their employer or to an entity with which they have a contractual arrangement (including part 424, subpart F)

**Must be consistent with § 495.10 with Defined in clause (A) of section 1842(b)(6) of the Act and in accordance with regulations at 42 CFR 424.73 and 42 CFR 424.80**

**Why is “Meaningful Use”  
so Important?**

# **Federal Health IT Strategic Plan 2011 - 2015**

## **HHS Goals**

- > Improve Care,**
- > Improve Population Health, and**
- > Reduce Health Care Costs through the Use of Health IT**

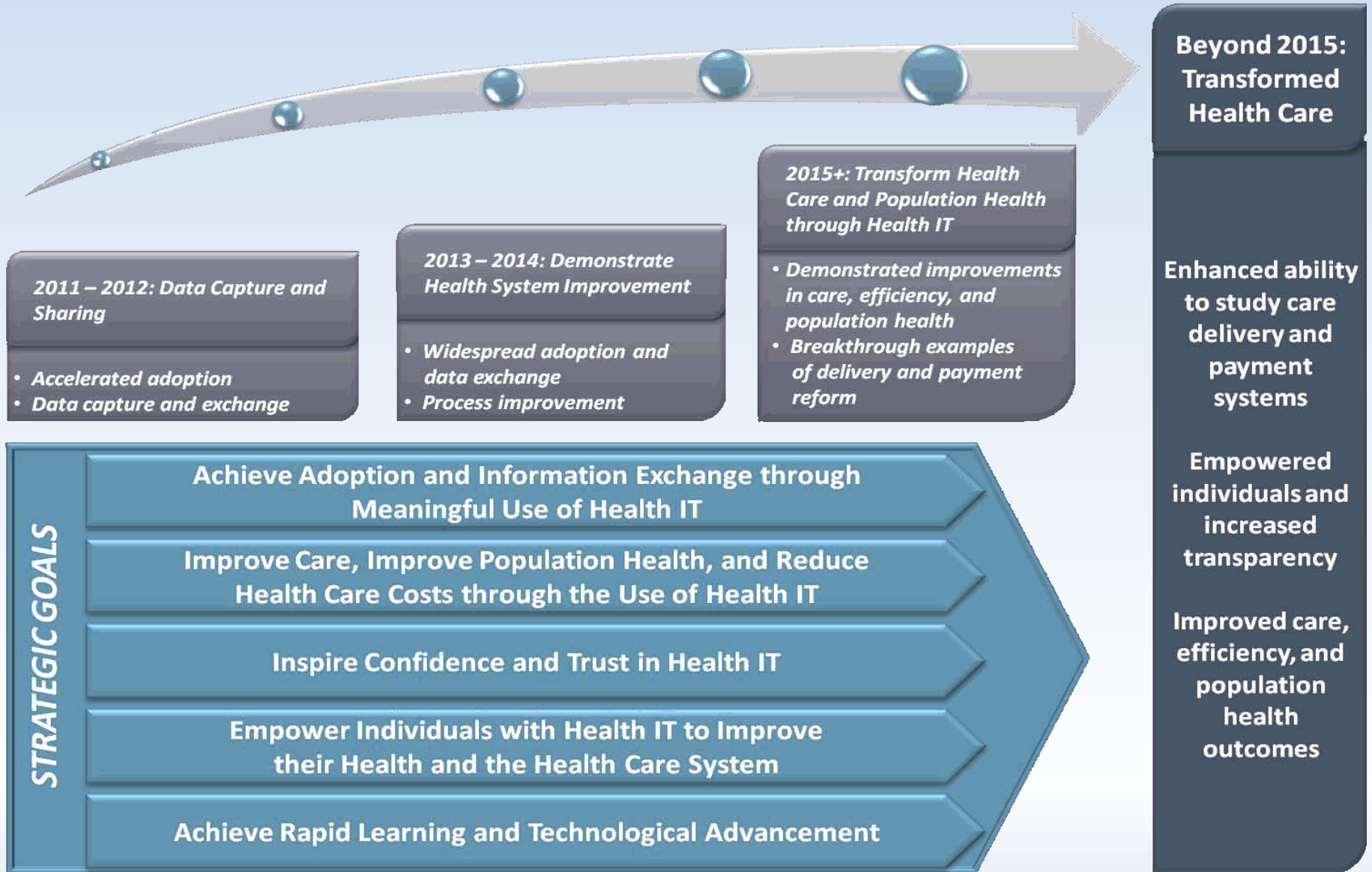
# Federal Health IT Strategic Plan 2011 - 2015

## Four Objectives for those goals

- A.** Support more sophisticated uses of EHRs and other health IT to improve health system performance
- B.** Better manage care, efficiency, and population health through EHR-generated reporting measures
- C.** Demonstrate health IT-enabled reform of payment structures, clinical practices, and population health management
- D.** Support new approaches to the use of health IT in research, public and population health, and national health security



# Federal Health IT Strategic Map



# **Behavioral Health Providers will be included!!**

*ONC Strategic Plan*

*Objective A*

*Strategy I.A.7: Align federal programs and services with the adoption and meaningful use of certified EHR technology*

**Specifically The Substance Abuse and Mental Health Services Administration (SAMHSA) is working to foster adoption and implementation of certified EHRs among its providers that are ineligible for the Medicare and Medicaid EHR Incentive Programs, including community mental health centers and substance use disorder treatment programs...**

For more information and to download a Meaningful Use Gap Analysis Tool

Visit the CIHS HIT web site at

[http://www.thenationalcouncil.org/cs/resources\\_services/resource\\_center\\_for\\_healthcare\\_collaboration/operations/hit](http://www.thenationalcouncil.org/cs/resources_services/resource_center_for_healthcare_collaboration/operations/hit)

To find certified health information technology go to the “ONC Certified Health Product List”

<http://onc-chpl.force.com/ehrcert>

To find the State Designated Entity (SDE) for HIE

[http://healthit.hhs.gov/portal/server.pt?open=512&objID=1488&parentname=CommunityPage&parentid=58&mode=2&in\\_hi\\_userid=11113&cached=true](http://healthit.hhs.gov/portal/server.pt?open=512&objID=1488&parentname=CommunityPage&parentid=58&mode=2&in_hi_userid=11113&cached=true)

# Questions?

