



**HAWAII HEALTH SYSTEMS**  
C O R P O R A T I O N

*"Touching Lives Every Day"*

## ***COMPLIANCE ALERT 13-2***

# ***CMS Seeks Comments on Hospital Readiness for EHR Hospital Inpatient Quality Data Reporting***

CMS is requesting "information from hospitals, electronic health record (EHR) vendors, and other interested parties regarding hospital readiness beginning calendar year 2014 discharges to electronically report certain patient-level data under the Hospital Inpatient Quality Reporting (IQR) Program using the Quality Reporting Document Architecture (QRDA) Category I." The official announcement by CMS in the *Federal Register* can be found in the link below.

**Deadline for Input:** Comments must be received no later than 5 p.m. EST on January 22, 2013

**Background:** Currently, hospitals report data on selected quality measures to CMS, which makes the data available to the public. Failing to report the required data can lead to reductions in their Medicare payments. Under the present system, the data is extracted manually. CMS is seeking to change that through the use of the EMR technology.

**CMS Questions:** "CMS is specifically soliciting comments from hospitals and other interested parties on the following topics:

- Is the hospital planning to adopt EHR technology that has been certified to the 2014 Edition EHR certification criteria during or before calendar year (CY) 2014?
- Is the hospital aware of the payment adjustments authorized under the HITECH Act beginning in FY 2015 for failing to demonstrate meaningful use under the Medicare EHR Incentive Program?
- Is the hospital planning to *electronically* report CQM data—specifically venous thromboembolism (VTE) and stroke (STK) and emergency department (ED) measures—under the Medicare EHR Incentive Program in FY 2014?
- Is the hospital already participating in or planning to participate in the 2013 Medicare EHR Incentive Program Electronic Reporting Pilot for Eligible Hospitals and Critical Access Hospitals (CAHs) ("Pilot")? If not, what barriers prevent the hospital from participating?
- Does the hospital plan to report data leveraging any state health information exchange (HIE) initiative?
- Does the hospital plan to report data leveraging the Nationwide Health Information Network (NwHIN) Exchange, which is now the eHealth Exchange?

- Will the hospital use a third party to report quality data required under the EHR Incentive Program?
- Are there operational challenges to electronically reporting quality data? If so, does the hospital have mitigation plans to overcome these challenges?
- Has the hospital chief information officer (CIO) and/or chief operating officer (COO) prioritized electronically reporting quality data over the next 3 years (2013 through 2015)?
- Are there any evaluation or data validation methodologies that have been used by the hospital to assess the accuracy and reliability of clinical process of care quality data using QRDA category I standards?
- What barriers and opportunities would be created by including sampling criteria for electronically reported measures under the EHR Incentive Program?
- Is the EHR vendor's technology currently certified under the Office of the National Coordinator for Health Information Technology (ONC) Health Information Technology (HIT) Certification Program to the 2001 Edition EHR Certification Criteria? Does the vendor intend to have its EHR technology certified to the 2014 Edition EHR Certification Criteria? If so, when?
- What are the top three operational challenges facing EHR vendors over the next 3 years (2013 through 2015)? Of those identified, does the EHR vendor have mitigation plans to overcome these challenges?
- Are there any evaluation or data validation methodologies that have been used to assess the accuracy and reliability of clinical process of care quality data used to assess the accuracy and reliability of clinical process of care quality data using QRDA category I standards?
- Have vendors included random sampling functionalities in currently certified systems? If yes, what guidance for random sampling has been employed, if any? If no, what barriers are presented by adding this functionality to your currently certified systems?"

Please refer to the official announcement (link below) for full information.

Source: <http://www.gpo.gov/fdsys/pkg/FR-2013-01-03/pdf/2012-31582.pdf>  
[http://www.kslaw.com/News-and-Insights/PublicationDetail?us\\_nsc\\_id=6179](http://www.kslaw.com/News-and-Insights/PublicationDetail?us_nsc_id=6179)