

Wisconsin Medicaid Promoting Interoperability Program

Syndromic Surveillance Measure Guidance for Eligible Professionals

This document provides guidance to Eligible Professionals participating in the Wisconsin Medicaid Promoting Interoperability (PI) Program on attestation to the Public Health Reporting Objective Measure 2 Syndromic Surveillance Reporting.

To meet the Public Health Reporting Objective Measure 2 Syndromic Surveillance Reporting for meaningful use, the Centers for Medicare & Medicaid Services (CMS) has declared an Eligible Professional must be in “active engagement” with a public health agency (PHA) to submit electronic public health data from certified electronic health record technology (CEHRT), except where prohibited and in accordance with applicable law and practice. CMS has detailed three options to meet active engagement:

- **Active Engagement Option 1 – Completed Registration to Submit Data:** The Eligible Professional registered to submit data with the PHA; registration was completed within 60 days after the start of the Electronic Health Record (EHR) reporting period; and the Eligible Professional is awaiting an invitation from the PHA to begin testing and validation.
- **Active Engagement Option 2 – Testing and Validation:** The Eligible Professional is in the process of testing and validating the electronic submission of data. Eligible Professionals must respond to requests from the PHA within 30 days; failure to respond twice within an EHR reporting period would result in the Eligible Professional not meeting the measure.
- **Active Engagement Option 3 – Production:** The Eligible Professional has completed testing and validation of the electronic submission and is electronically submitting production data to the PHA.

For assistance in determining the proper documentation in the event of an audit, please review the Suggested Documentation section at the end of this document.

Guidance for Program Years 2020 and 2021

Effective January 1, 2021, the Wisconsin Department of Health Services (DHS) Division of Public Health (DPH) is accepting syndromic surveillance data from most categories of Eligible Professionals. The table below identifies the Eligible Professionals from whom DPH is accepting data, based on Provider Type and Specialty code.

Medicaid PI Program Eligible Provider Type	PT	Type Description	PS	Specialty Description	SS Data Collected from Specialty?
Hospitals (Acute Care, Critical Access and Children’s)	1	Hospital	10	Inpatient/Outpatient Hospital	Yes
Nurse Practitioner	9	Nurse Practitioner	90	Certified Pediatric Nurse Practitioner	Yes
Nurse Practitioner	9	Nurse Practitioner	92	Certified Family Nurse Practitioner	Yes
Nurse Practitioner	9	Nurse Practitioner	93	Other Nurse Practitioner	Yes
Nurse Practitioner	9	Nurse Practitioner	95	Nurse Practitioner/Nurse Midwife	Yes
Physician Assistant	10	Physician Assistant	100	Physician Assistant	Yes
Nurse Practitioner	11	Mental Health and Substance Abuse Services	125	Advanced Practice Nurse Prescriber	Yes

Medicaid PI Program Eligible Provider Type	PT	Type Description	PS	Specialty Description	SS Data Collected from Specialty?
Certified Nurse Midwife	16	Nurse Service	212	Nurse Midwife	Yes
Dentist	27	Dentist	270	Endodontics	No
Dentist	27	Dentist	271	General Practice	No
Dentist	27	Dentist	272	Oral Surgery	No
Dentist	27	Dentist	273	Orthodontics	No
Dentist	27	Dentist	274	Pediatric Dentist	No
Dentist	27	Dentist	275	Periodontics	No
Dentist	27	Dentist	276	Oral Pathology	No
Dentist	27	Dentist	277	Prosthodontics	No
Physician	31	Physician	310	Allergy and Immunology	Yes
Physician	31	Physician	311	Anesthesiology	No
Physician	31	Physician	312	Cardiovascular Disease	Yes
Physician	31	Physician	314	Dermatology	Yes
Physician	31	Physician	315	Emergency Medicine	Yes
Physician	31	Physician	316	Family Practice	Yes
Physician	31	Physician	317	Gastroenterology	Yes
Physician	31	Physician	318	General Practice	Yes
Physician	31	Physician	319	General Surgery	No
Physician	31	Physician	320	Geriatrics	Yes
Physician	31	Physician	322	Internal Medicine	Yes
Physician	31	Physician	324	Nephrology	Yes
Physician	31	Physician	325	Neurological Surgery	No
Physician	31	Physician	326	Neurology	Yes
Physician	31	Physician	327	Nuclear Medicine	Yes
Physician	31	Physician	328	Obstetrics and Gynecology	No
Physician	31	Physician	329	Oncology and Hematology	Yes
Physician	31	Physician	330	Ophthalmology	Yes
Physician	31	Physician	331	Orthopedic Surgery	No
Physician	31	Physician	332	Otolaryngology	Yes
Physician	31	Physician	333	Pathology	Yes
Physician	31	Physician	336	Physical Medicine and Rehab	No

Medicaid PI Program Eligible Provider Type	PT	Type Description	PS	Specialty Description	SS Data Collected from Specialty?
Physician	31	Physician	337	Plastic Surgery	No
Physician	31	Physician	338	Proctology	Yes
Physician	31	Physician	339	Psychiatry	Yes
Physician	31	Physician	340	Pulmonary Disease	Yes
Physician	31	Physician	341	Radiology	Yes
Physician	31	Physician	342	Thoracic and Cardiovascular Surgery	No
Physician	31	Physician	343	Urology	Yes
Physician	31	Physician	345	Pediatrician	Yes
Physician	31	Physician	354	Preventative Medicine	No

Attestation Guidance for Program Year 2020

The DPH policy declaration is not intended to affect Eligible Professionals' Program Year 2020 attestations.

Eligible Professionals submitting production data	<p>Eligible Professionals electronically submitting production data qualify to meet Active Engagement Option 3 for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2020.</p> <p>Eligible Professionals are required by DPH to register with the Public Health Registration for Electronic Data Submission System (PHREDS) for proper audit documentation for Active Engagement Option 3, provided in the form of acknowledgment documents.</p>
Eligible Professionals not submitting production data	<p>Prior to January 1, 2021 DPH did not collect syndromic surveillance data from any category of Eligible Professional unless the Eligible Professional was already in production sending syndromic surveillance data. Therefore, Eligible Professionals who were not submitting production data prior to January 1, 2021 qualify to meet Exclusion 3: "Operates in a jurisdiction where no PHA has declared readiness to receive syndromic surveillance data from Eligible Professionals at the start of the EHR reporting period" for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2020.</p>

Attestation Guidance for Program Year 2021

The DPH policy declaration is intended to more closely align with public health program data needs.

<p>Eligible Professionals submitting production data</p>	<p>Eligible Professionals electronically submitting production data qualify to meet Active Engagement Option 3 for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2021.</p> <p>Eligible Professionals are required by DPH to register with PHREDS for proper audit documentation for Active Engagement Option 3, provided in the form of acknowledgment documents.</p>
<p>Eligible Professionals who have already registered their intent to submit data</p>	<p>Eligible Professionals who registered their intent to submit syndromic surveillance data to DPH no later than 60 days after the start of their EHR reporting period qualify to meet Active Engagement Option 1 for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2021.</p> <p>Eligible Professionals are required by DPH to register with PHREDS for proper audit documentation for Active Engagement Option 1, provided in the form of acknowledgment documents.</p>
<p>Eligible Professionals with a PI reporting period beginning after January 1, 2021 who have not yet registered their intent to submit data</p>	<p>If you or your organization registers your intent to submit syndromic surveillance data to DPH no later than 60 days after the start of your EHR reporting period, you qualify to meet Active Engagement Option 1 for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2021.</p> <p>Eligible Professionals are required by DPH to register with PHREDS for proper audit documentation for Active Engagement Option 1, provided in the form of acknowledgment documents.</p> <p>If DPH is not collecting syndromic surveillance data from your Provider Type and Specialty, you qualify to meet Exclusion 1: “Is not in a category of providers from which ambulatory syndromic surveillance data is collected by their jurisdiction” for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2021.</p>

Guidance for Program Years 2015 through 2019

Between April 27, 2016 and December 31, 2020 DPH did not accept syndromic surveillance data from any category of Eligible Professional.

Attestation Guidance for Program Year 2015	
The DPH policy declaration is not intended to affect Eligible Professionals' Program Year 2015 attestations.	
Eligible Professionals submitting production data	<p>Eligible Professionals electronically submitting production data to BioSense 2.0 or the Wisconsin Statewide Health Information Network (WISHIN) qualify to meet Active Engagement Option 3 for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2015.</p> <p>Eligible Professionals are required by DPH to register with PHREDS for proper audit documentation for Active Engagement Option 3, provided in the form of acknowledgment documents.</p>
Eligible Professionals who registered their intent to submit data	<p>Eligible Professionals who registered their intent to submit syndromic surveillance data to DPH no later than 60 days after the start of their EHR reporting period qualify to meet Active Engagement Option 1 for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2015.</p> <p>Alternately, CMS has provided information for providers concerning the availability of an alternate exclusion for a measure if they never intended to attest to the equivalent prior menu objective for Program Year 2015; for more information, review CMS FAQ# 12985.</p>

Attestation Guidance for Program Year 2016

The DPH policy declaration is intended to provide flexibility to Eligible Professionals' Program Year 2016 attestations and to more closely align with public health program data needs.

<p>Eligible Professionals submitting production data</p>	<p>Eligible Professionals electronically submitting production data to BioSense 2.0 or WISHIN qualify to meet Active Engagement Option 3 for the purposes of attesting to the Syndromic Surveillance Reporting Measure.</p> <p>Eligible Professionals are required by DPH to register with PHREDS for proper audit documentation for Active Engagement Option 3, provided in the form of acknowledgment documents.</p>
<p>Eligible Professionals with a full year EHR reporting period</p>	<p>If you or your organization registered your intent to submit syndromic surveillance data to DPH on or before February 29, 2016, you have the option to remain registered and meet Active Engagement Option 1 for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2016.</p> <p>Alternately, CMS has provided information for providers concerning the availability of an alternate exclusion for a measure if they did not intend to include that measure in their activities for meaningful use for Program Year 2016; for more information, review CMS FAQ #14397.</p>
<p>Eligible Professionals with a 90-day EHR reporting period starting before April 27, 2016</p>	<p>If you or your organization registered your intent to submit syndromic surveillance data to DPH no later than 60 days after the start of your EHR reporting period, you have the option to remain registered and meet Active Engagement Option 1 for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2016.</p> <p>Alternately, CMS has provided information for providers concerning the availability of an alternate exclusion for a measure if they did not intend to include that measure in their activities for meaningful use for Program Year 2016; for more information, review CMS FAQ #14397.</p>
<p>Eligible Professionals with a 90-day EHR reporting period starting on or after April 27, 2016</p>	<p>DPH is not collecting ambulatory syndromic surveillance data from any category of Eligible Professional unless the Eligible Professional is already in production and sending syndromic surveillance data to BioSense 2.0 or WISHIN. Therefore, Eligible Professionals who are not currently submitting production data qualify to meet Exclusion 1: "Is not in a category of providers from which emergency syndromic surveillance data is collected by their jurisdiction" for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Year 2016.</p>

Attestation Guidance for Program Years 2017 through 2019

The DPH policy declaration is intended to more closely align with public health program data needs.

Eligible Professionals submitting production data

Eligible Professionals electronically submitting production data to BioSense 2.0 or WISHIN qualify to meet Active Engagement Option 3 for the purposes of attesting to the Syndromic Surveillance Reporting Measure.

Alternately, given the revised public health declaration, all Eligible Professionals in Wisconsin qualify to take Exclusion 1: “Is not in a category of providers from which ambulatory syndromic surveillance data is collected by their jurisdiction’s syndromic surveillance system” for the Syndromic Surveillance Reporting Measure.

Eligible Professionals not submitting production data

DPH is not collecting ambulatory syndromic surveillance data from any category of Eligible Professional unless the Eligible Professional is already in production and sending syndromic surveillance data to BioSense 2.0 or WISHIN. Therefore, Eligible Professionals who are not currently submitting production data qualify to meet Exclusion 1: “Is not in a category of providers from which ambulatory syndromic surveillance data is collected by their jurisdiction’s syndromic surveillance system” for the purposes of attesting to the Syndromic Surveillance Reporting Measure for Program Years 2017, 2018, and/or 2019.

Suggested Documentation

Eligible Professionals who qualify to meet Active Engagement Option 1	DPH recommends that you retain your Registration Confirmation email, a copy of this document, a copy of the DPH Meaningful Use Declaration of Readiness table (found on the Reporting Guidance web page), and a copy of the revised public health declaration on the Syndromic Surveillance web page for audit purposes.
Eligible Professionals who qualify to meet Active Engagement Option 3	DPH recommends that you retain this document, a copy of the DPH Meaningful Use Declaration of Readiness table (found on the Reporting Guidance web page), and the relevant PHREDS Acknowledgements document after your EHR for audit purposes.
Eligible Professionals intending to select Exclusion 1 in Program Year 2016 and beyond	DPH recommends you retain this document and a copy of the DPH Meaningful Use Declaration of Readiness table (found on the Reporting Guidance web page) for audit purposes.
Eligible Professionals intending to select an alternate exclusion for Program Year 2015 or 2016	Per the CMS final rule (80 FR 62788) no documentation is required for the alternate exclusions for Program Year 2015 or 2016.

For more information

- Email: dhsehealth@wisconsin.gov
- Visit: www.dhs.wisconsin.gov/ehrincentive or www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/index.html



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