Wisconsin Medicaid Electronic Health Record (EHR) Incentive Program

Eligible Professional Attestation Guidance for the Modified Stage 2 Public Health Reporting Objective in Program Year 2017

This document contains attestation guidance for the Modified Stage 2 Public Health Reporting Objective in Program Year 2017 for Eligible Professionals.

The ultimate goal of receiving public health data from Eligible Professionals is to improve surveillance capabilities and use the data collected to positively affect the care of patients in Wisconsin. Several Wisconsin Division of Public Health (DPH) programs have declared readiness to receive public health data from certified EHR technology (CEHRT) for the purposes of the EHR Incentive Programs. Eligible Professionals who collect relevant public health data are invited to coordinate with these DPH programs to send production data from CEHRT. This document recommends actions for Eligible Professionals to take to begin sending public health data to DPH programs and provides attestation guidance to help determine if they are ready to attest to the Meaningful Use Public Health Reporting Objective.

How to Use This Document: Answer the numbered questions in Sections 1 and 2 below. Each section contains multiple questions that will help guide you in determining how to properly attest to the Public Health Reporting Objective in Program Year 2017.

- Section 1: Background – This section contains questions to determine if the Eligible Professional is both eligible to submit data to the relevant DPH programs and eligible to participate in the EHR Incentive Program.
- Section 2: Measure Specific Guidance – This section helps the Eligible Professional determine if he or she is ready to attest to the Public Health Reporting Objective in Program Year 2017.

Depending on your responses to the yes/no questions, you will be provided with a suggested action or specific guidance. Each possible response contains a bolded **Recommended Action** and/or **Attestation Guidance** to assist you with properly attesting to the Program Year 2017 Modified Stage 2 Public Health Reporting Objective:

- **Recommended Actions** help guide you through the sections of this document and list actions the Wisconsin Division of Public Health (DPH) recommends you take to begin sending public health data to a DPH program.
- **Attestation Guidance** helps you determine if you are ready to attest to the Public Health Reporting Objective in Program Year 2017.

IMPORTANT: Before answering the questions in the sections below, you should be familiar with the detailed requirements for successfully attesting to the Public Health Reporting Objective. Refer to the Appendix at the end of this document or visit the DPH Public Health Meaningful Use Reporting Guidance page for this information.

Proceed to Section 1 below.

Section 1: Background

Instructions: The questions below will help you determine if you are both eligible to submit data to the relevant DPH programs and eligible to participate in the EHR Incentive Program. This section contains two questions and guidance for each possible response. Your response to the question(s) will guide you through the document and determine if you should proceed to Section 2.

Start by reading Question 1. Answer the question and read the information corresponding to your response.

Question 1: Do you have the 2014 Edition, the 2015 Edition, or a combination of the two Editions of CEHRT? **For Meaningful Use purposes, DPH programs are only accepting data submitted from EHR technology certified to the current federal standards.**		
YES **Recommended Action:** Once you have confirmed your EHR technology is certified to the 2014 Edition, proceed to Question 2 below.	**DO NOT KNOW** **Recommended Action:** If you are unsure about your EHR certification, check with your EHR vendor or verify using the Certified Health IT Product List.	**NO** **Recommended Action:** If you do not have EHR technology certified to the 2014 Edition, do not register your intent to submit data to DPH programs detailed in this document.
Question 2: Are you an Eligible Professional? **Healthcare professionals must meet eligibility criteria defined by law to receive incentive payments.**		
YES This document provides guidance to Eligible Professionals intending to attest to the Medicare and Medicaid EHR Incentive Program(s). For information on how to register for and attest to the EHR Incentive Programs, review the Centers for Medicare and Medicaid Services (CMS) Registration and Attestation page. **Recommended Action:** Proceed to Section 2 below.	**DO NOT KNOW** For more information about eligibility for the Medicare and Medicaid EHR Incentive Programs, review CMS guidance on Medicare and Medicaid EHR Incentive Program eligibility.	**NO** If you are not an Eligible Professional, this document may not provide you with proper guidance. This document provides guidance to Eligible Professionals intending to attest to the Medicare and Medicaid EHR Incentive Program(s).

This concludes Section 1: Background. These questions were asked to determine the Eligible Professional is both eligible to submit data to DPH programs detailed in this document and eligible to participate in the Medicare and Medicaid EHR Incentive Program(s). If you have been instructed to do so, proceed to Section 2 below.

Section 2: Measure Specific Guidance

Instructions: The questions below will help you determine if you are ready to attest to the Public Health Reporting Objective in Program Year 2017. This section contains a table for each of the three public health measures available to Eligible Professionals. Each measure contains questions that help identify whether the relevant DPH program is collecting data from Eligible Professionals like you and whether you have taken actions required to begin sending public health data to the program. Your response to the questions will guide you through the document.

For each measure, start by reading Question 1. Answer the question, read the information corresponding to your response, and continue to the next measure.

Measure 1: Immunization Registry Reporting

Question 1: Do you administer immunizations?

YES	NO
DPH is collecting immunization data from Eligible Professionals who administer immunizations. **Recommended Action:** Proceed to Question 2 below.	DPH is **not** establishing connections to Eligible Professionals who do not administer immunizations. **Attestation Guidance:** Determine which exclusion may be applicable to you. DPH does not formally grant exclusions or offer individual documentation to support the exclusion. **Recommended Action:** Proceed to Measure 2: Syndromic Surveillance Reporting.

Question 2: Did you register to submit immunization data to DPH?

In Wisconsin, this registration is completed by submitting a registration form through the Public Health Registration for Electronic Data Submission System (PHREDS).

YES	DO NOT KNOW	NO
Attestation Guidance: Eligible Professionals who have registered with DPH and believe they have taken proper actions to meet the measure should choose the active engagement option that most closely reflects their current status. For more information on the active engagement options, review the DPH Reporting Guidance page.	**Recommended Action:** If you are not sure if a PHREDS registration form already exists for your organization, email DHSeHealth@wi.gov with the subject line "Confirm Existing Registration Form" and provide the name of your organization. Eligible Professionals who have completed a registration in previous years do not need to submit a new registration for each EHR reporting period as long as the registration contains accurate information.	**Recommended Action:** All Eligible Professionals should register with DPH for the public health program(s) to which they intend to electronically submit data. For additional information on how to register, review the Public Health Meaningful Use in Wisconsin page. **Attestation Guidance:** Eligible Professionals who believe they have taken proper actions to meet the measure should choose the active engagement option which most closely reflects their current status. For more information on the active engagement options, review the DPH Reporting Guidance page.

Measure 2: Syndromic Surveillance Reporting

Question 1: Are you sending syndromic surveillance data via CEHRT to DPH?

Production data refers to data generated through clinical processes involving patient care. Wisconsin providers have the option of submitting this data either directly to BioSense 2.0 or through WISHIN to BioSense 2.0.

YES	NO
Recommended Action: Proceed to Question 2.	Effective 4/27/2016, Wisconsin DPH is **not** collecting ambulatory syndromic surveillance data from any category of Eligible Professional unless they are already in production and sending syndromic surveillance data to BioSense 2.0 or WISHIN. **Attestation Guidance:** Review the Syndromic Surveillance Measure Guidance for Eligible Professionals (P-01254) for additional attestation guidance.

Question 2: Did you register to submit syndromic surveillance data to DPH?

In Wisconsin, this registration is completed by submitting a registration form through the Public Health Registration for Electronic Data Submission System (PHREDS).

YES	DO NOT KNOW	NO
Attestation Guidance: Eligible Professionals who have registered with DPH and believe they have taken proper actions to meet the measure should choose the active engagement option that most closely reflects their current status. For more information on the active engagement options, review the DPH Reporting Guidance page. Review the Syndromic Surveillance Measure Guidance for Eligible Professionals (P-01254) for additional attestation guidance.	**Recommended Action:** If you are not sure if a PHREDS registration form already exists for your organization, email DHSeHealth@wi.gov with the subject line "Confirm Existing Registration Form" and provide the name of your organization.	**Recommended Action:** All Eligible Professionals should register with DPH for the public health program(s) to which they intend to electronically submit data. For additional information on how to register, review the Public Health Meaningful Use in Wisconsin page. **Attestation Guidance:** Eligible Professionals who have taken proper actions to meet the measure should choose the active engagement option which most closely reflects their current status. Review the Syndromic Surveillance Measure Guidance for Eligible Professionals (P-01254) for additional attestation guidance.

Measure 3: Specialized Registry Reporting		
Question 1A: Do you clinically or pathologically diagnose cancer and/or provide cancer-directed first-course treatment?		
YES **Recommended Action:** Proceed to Question 1B below.	**DO NOT KNOW** **Recommended Action:** Contact the Wisconsin Cancer Reporting System (WCRS) at cancer@wi.gov to request more information on its definitions of diagnosis and first-course treatment.	**NO** **Recommended Action:** Proceed to Question 3 on page 7.
Question 1B: Do you have technology certified to create cancer case information and transmit information to cancer registries? **The Wisconsin Cancer Reporting System (WCRS) is only accepting data submitted from EHR technology certified to the current federal standards specific to the cancer reporting option, §170.314(f)(5) and §170.314(f)(6).**		
YES If you answered "YES" to both Question 1A and 1B, DPH is collecting cancer case reporting data from Eligible Professionals like you. **Recommended Action:** Proceed to Question 2 on page 6.	**DO NOT KNOW** **Recommended Action:** Verify that your EHR technology is certified to **§170.314(f)(5)** and **§170.314(f)(6)**. If you are unsure about your EHR certification for cancer, check with your EHR vendor or verify using the Certified Health IT Product List.	**NO** If you do not have EHR technology certified to **§170.314(f)(5)** and **§170.314(f)(6)**, do not register your intent to submit cancer data to DPH. **Recommended Action:** Proceed to Question 3 on page 7.

Question 2: Did you register to submit cancer data to DPH? In Wisconsin, this registration is completed by submitting a registration form through the Public Health Registration for Electronic Data Submission System (PHREDS).		
YES	**DO NOT KNOW**	**NO**
Attestation Guidance: Eligible Professionals who have registered with DPH and believe they have taken proper actions to meet the measure should choose the active engagement option that most closely reflects their current status. For more information on the active engagement options, review the DPH Reporting Guidance page. **Reminder:** The Specialized Registry Reporting Measure may be used twice to meet the required number of measures. **Recommended Action:** Proceed to Question 3 on the next page.	**Recommended Action:** If you are not sure if a PHREDS registration form already exists for your organization, email DHSeHealth@wi.gov with the subject line "Confirm Existing Registration Form" and provide the name of your organization. Eligible Professionals who have completed a registration in previous years do not need to submit a new registration for each EHR reporting period as long as the registration contains accurate information.	**Recommended Action:** All Eligible Professionals should register with DPH for the public health program(s) to which they intend to electronically submit data. For additional information on how to register, review the Public Health Meaningful Use in Wisconsin page. **Attestation Guidance:** Eligible Professionals who believe they have taken proper actions to meet the measure should choose the active engagement option that most closely reflects their current status. For more information on the active engagement options, review the DPH Reporting Guidance page. Additionally, if you are engaged with specialized registries not sponsored by DPH, proceed to Question 3 on the next page.

Question 3: Do you intend to meet the Specialized Registry Reporting Measure using a registry outside of DPH? **For Program Year 2017, the Wisconsin Cancer Reporting System (WCRS) is the only specialized registry for which DPH has declared readiness to accept electronic data from CEHRT.**	
YES	**NO**
CMS does not limit the specialized registries that may be used to satisfy the Specialized Registry Reporting Measure to those sponsored by state and local public health agencies. However, if you choose to leverage a registry that is not sponsored by DPH for the Specialized Registry Reporting Measure, DPH does not provide registration, administrative onboarding, compliance, or audit support. **Recommended Action:** If you intend to use your active engagement with specialized registries not sponsored by DPH to satisfy the Specialized Registry Reporting Measure, review CMS FAQ #13653 regarding what counts as a specialized registry. **Attestation Guidance:** Meeting active engagement requirements with a registry fitting the description provided in CMS FAQ #13653 allows you to meet the Specialized Registry Reporting Measure. **Reminder:** The Specialized Registry Reporting Measure may be used twice to meet the required number of measures.	**Recommended Actions:** Complete two steps of due diligence to determine if there is a specialized registry available to you. According to the CMS, an Eligible Professional must complete steps 1 and 2 below to determine if they qualify for an exclusion from the Specialized Registry Reporting Measure. 1. Check the DPH Public Health Meaningful Use homepage to determine if there is a specialized registry sponsored by the state for which you are eligible. For Program Year 2017, WCRS is the only specialized registry for which DPH has declared readiness to accept electronic data from CEHRT. 2. Check with the specialty societies with which you are affiliated to determine if there is a specialized registry available to you that qualifies for the Meaningful Use Program. Review CMS FAQ #13653 regarding what counts as a specialized registry. **Attestation Guidance:** After completing the previous two steps of due diligence, if you have determined there is not a qualifying specialized registry available to you, then you may self-attest to an exclusion. Determine which exclusion may be applicable to you. DPH does not formally grant exclusions or offer individual documentation to support the exclusion.

This concludes Section 2: Measure Specific Guidance. These questions were asked to help determine if you are ready to attest to the Public Health Reporting Objective in Program Year 2017.

Appendix

Public Health Reporting Objective and Measure Options

To meet Meaningful Use requirements and receive an incentive payment, Eligible Professionals must meet a number of objectives and measures established by CMS for the EHR Incentive Programs.

All Eligible Professionals will attest to a Public Health Reporting Objective that requires providers to actively engage with their public health agency to submit public health data electronically from EHR technology certified for the EHR Incentive Programs.

How to Attest to the Objective

The Public Health Reporting Objective is comprised of three measure options:

- Measure 1 – Immunization Registry Reporting
- Measure 2 – Syndromic Surveillance Reporting
- Measure 3 – Specialized Registry Reporting

*The Specialized Registry Reporting Measure may be used twice to meet the required number of measures. Eligible Professionals in Program Year 2017 are required to attest to any two of the three measures. For more detailed information on the objective and measures, review the CMS Specification Sheet on the Eligible Professional Public Health Reporting Objective for 2015.

How to Meet a Measure: Demonstrating Active Engagement

To meet any of the public health reporting measures, an Eligible Professional must demonstrate **active engagement** with a public health agency. Active engagement means the Eligible Professional is engaging in certain actions that signal progress toward sending **production data** to a public health agency.[1] For example, a provider can actively engage with a public health agency by registering his or her intent to electronically submit a type of data they collect. For more details on active engagement requirements, review the DPH Reporting Guidance page.

Public Health Reporting Exclusions

For each of the measure options, an Eligible Professional has the choice to either meet the measure or claim an exclusion. There are multiple exclusions for each of the public health reporting measures, which may be claimed based on the types of public health data collected by an Eligible Professional and the public health agency's readiness to receive data. Eligible Professionals are required to self-attest to exclusions in the attestation system based on their ability to satisfy the exclusion criteria. An exclusion for a measure does not count toward the total number of measures required to meet the objective. If a provider is unable to meet the required number of measures, the Eligible Professional can meet the objective by excluding from all of the remaining measures. For more information on the public health reporting exclusions, review the DPH Reporting Guidance page.

Readiness of Public Health Programs in Wisconsin

DPH has declared readiness to electronically receive data from CEHRT for some of its public health programs. DPH's capability to accept data may change; therefore, Eligible Professionals should check the status of each program's capability at the start of each EHR reporting period. This information is regularly updated in the *Wisconsin Division of Public Health (DPH) Meaningful Use Declaration of Readiness* table on the DPH Reporting Guidance page.

Registration for Public Health Programs

All Eligible Professionals participating in the EHR Incentive Program should register with DPH if they intend to submit data to the public health programs that have declared readiness. In Wisconsin this registration is through the **Public Health Registration for Electronic Data Submission System (PHREDS).** PHREDS is a SharePoint site where Eligible Professionals register by submitting a registration form indicating their intent to submit data from CEHRT to the relevant public health program(s). Eligible Professionals who have completed a registration form in previous years do not need to

[1] Submitting production data shows that an Eligible Professional regularly reports data generated through clinical processes involving patient care from certified EHR technology (CEHRT) to a public health program.

submit a new registration for each EHR reporting period as long as the registration contains accurate information. For additional guidance on how to register your intent to electronically submit data, review the DPH PHREDS Enrollment and Registration of Intent page.

For more information:

- Email DHSeHealth@wisconsin.gov.
- Visit https://www.dhs.wisconsin.gov/phmu/index.htm or www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/index.html.