

Bridge over troubled waters

Getting from MU3 to MACRA
with the
OSEHRA Transition Toolkit

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Topics

- Transition in U.S. QI regulatory environment
 - Legacy CMS rule: PQRS & MU
 - New CMS rule: MACRA
 - Multi-jurisdictional QI system design
- Solution: OSEHRA Transition Toolkit



Legacy U.S. QI regulatory environment
Current CMS Regulatory environment

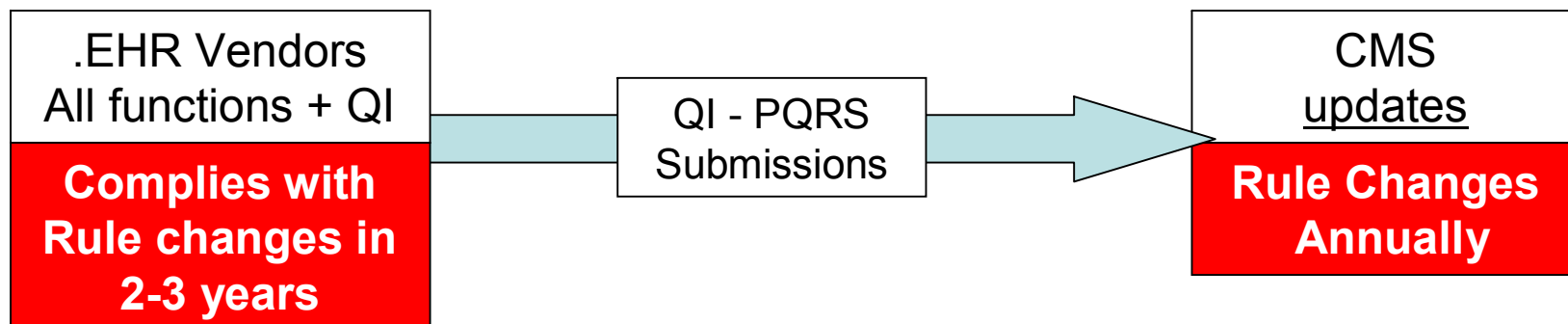
- PQRS - Legacy QI submission system
 - Physician Quality Report System (CMS)
 - QI metrics + Incentive/Disincentive programs
- MU – Meaningful Use
 - Define .EHR functions & certification processes (ONC)
- Status
 - MU1 & MU2 have been implemented
 - Superseded by MACRA
- MACRA addresses MU system issues

Let's review current MU systemic problems solved by MACRA . . .

MU Problem #1

MU participants have incongruent schedules

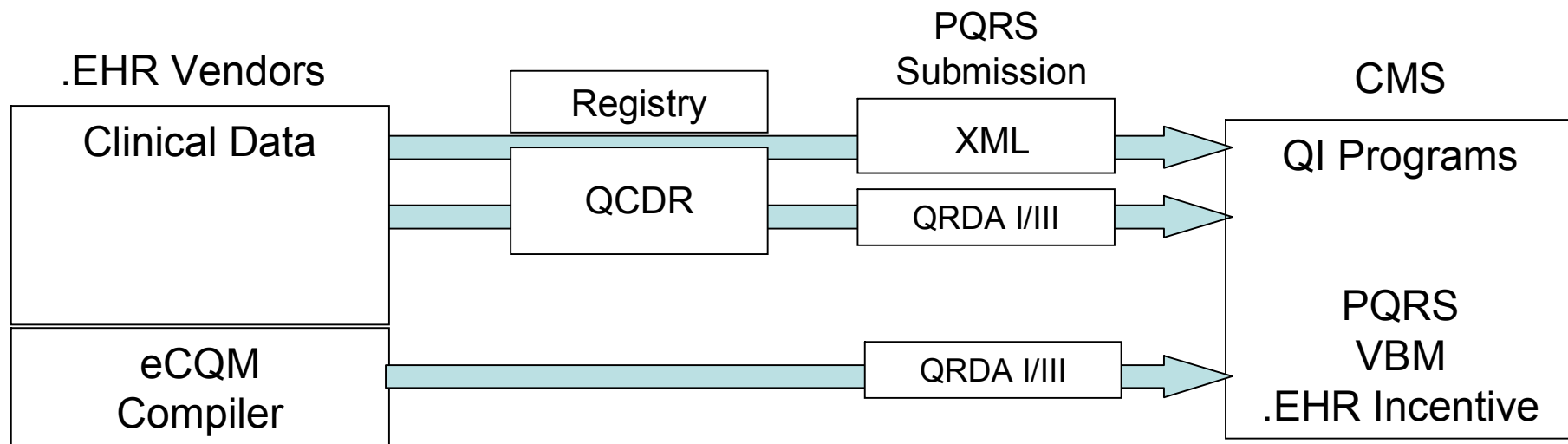
- MU process flow
 - **Current .EHR product cycle cannot track rule changes**
 - Regulatory QI rule updates **~ 1 Year**
 - Jurisdictions: Federal, State regulatory entities: CMS, CDC, Medicaid . . .
 - Report standards: HEDIS, XML, QRDA, 837p . . .
 - Current .EHR Product development cycle **~ 2-3 Years**
 - .EHR product cycle must **track multiple asynchronous regulatory update(s)**
 - Product cycle = Spec, implement, update, test, beta, purchase & rollout



MU Problem #2

Multiple PQRS submission paths and formats

- Multiple CMS submission process workflows
 - **Multiple submission paths**
 - .EHR , DSV, Registry, QCDR, Claims
 - **Multiple Submission formats**
 - XML & QRDA
 - **Requires redundant resources**



Transition from MU3 to MACRA
MACRA - New U.S. QI rule

- MACRA rule topics
 - Addresses MU system issues
 - MU/PQRS sunset - 12/31/2018
 - Updated eCQM version (v5)
 - Requires new functions
 - New interfaces
 - Patient bi-directional interfaces interoperability
 - New reports to multiple entities
 - Immunization, Syndromic Surveillance, Case reporting . . .

Transition from MU3 to MACRA

New CPC+ / MACRA mandate specifications

Most new .EHR functions defined by CPC+ are not Base.EHR

45 CFR 170.315 – Defines minimum .EHR requirement for certification process

#	Spec	<u>Base EHR</u>	Description
1	Updated eQMs - v5	yes	CPC+ RFA - Table D: List of CMS eQMs: (CMS159v5, 165v5 ... 50v5)
2	45 CFR 170.315(c)(4)	No	“Filter data by practice address & TIN/NPI”
3	45 CFR 170.315(b)(9)	No	“Care Plan“
4	45 CFR 170.315(a)(15)	No	“Social, Behavioral and Psychological Data “
5	HEDIS (AMB subset ED)	No	Ambulatory care: summary of utilization of ambulatory care in the following categories: ED visits
6	HEDIS (IPU)	No	Inpatient utilization—general hospital/acute care: summary of utilization of acute inpatient care and : total inpatient, maternity, surgery, and medicine.
7	Public Health and QCDR Reporting	No	Immunization Registry Reporting (Optional) Syndromic Surveillance Reporting, Electronic Case Reporting Public Health Registry Reporting, Clinical Data Registry Reporting
8	Patient Reported Outcomes Measure	No	Outcome/Patient Survey (TBD)
9	Coordination of Care Through Patient Engagement	No	Patient-Generated Health Data

MACRA solution
OSEHRA Transition Toolkit

- OSEHRA solution for QI mandates
 - Covers multiple requirements
 - MACRA
 - CPC+
 - Other QI entities (Immunization registries)
 - Assists Providers & EHRs
 - Better methods to manage QI processes
 - Addresses issue of unfunded mandates
 - Open source solution for Federal and State rules

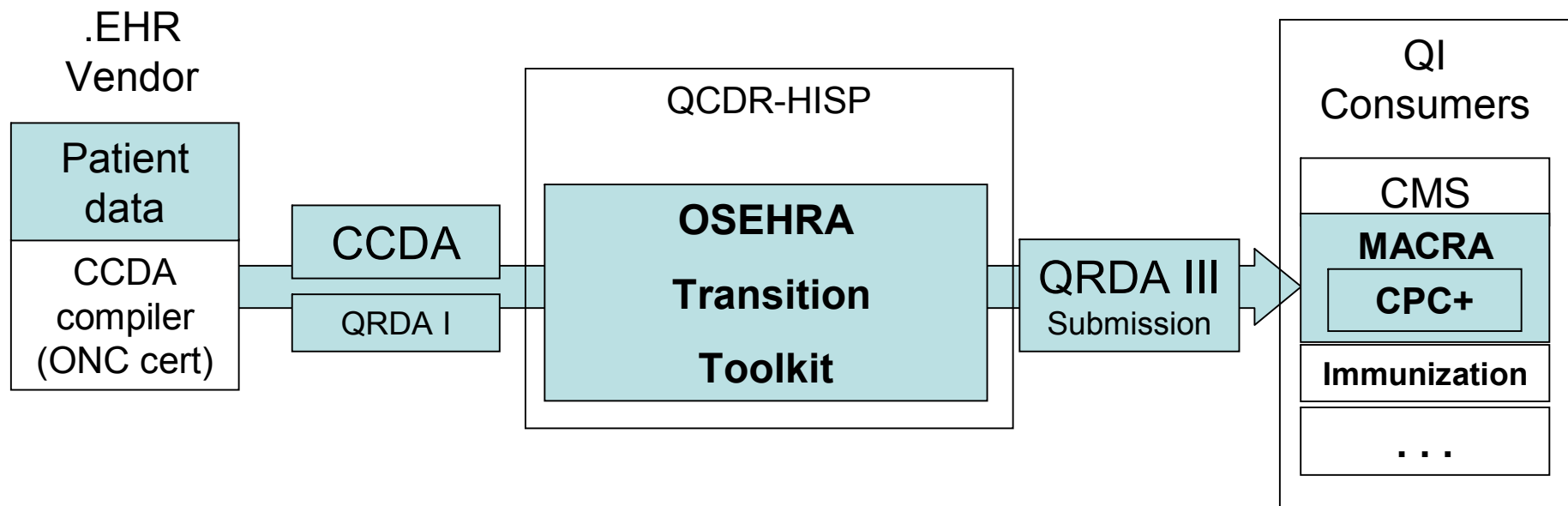
MACRA solution
QCDR + OSEHRA Transition Toolkit

- QCDR = MACRA implementation vehicle
 - Qualified Clinical Data Registry
 - MACRA specifically identifies QCDR submission path
 - QCDR-HISP
 - HISP – Health Information Service Provider
 - Provide MACRA submission extensions to .EHR
 - Short update cycle enables timely, nimble QI process

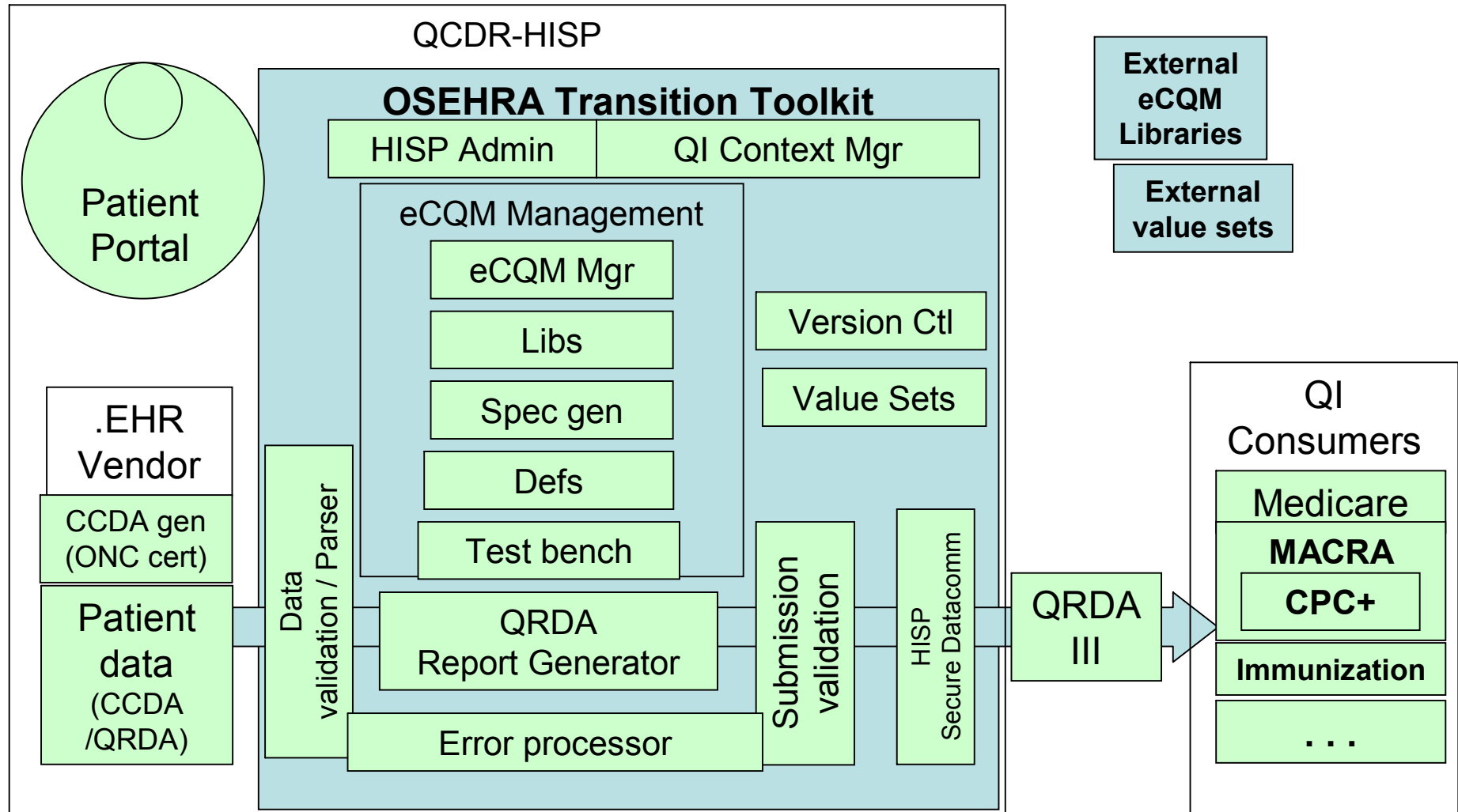
MACRA submission process

MACRA Workflow - OSEHRA Transition Toolkit

- MACRA QI process flow
 - Participants, EPs, .EHR vendors, QCDR, QI Consumers
 - Input patient data formats: CCDA or QRDA I
 - MACRA submission format: QRDA III

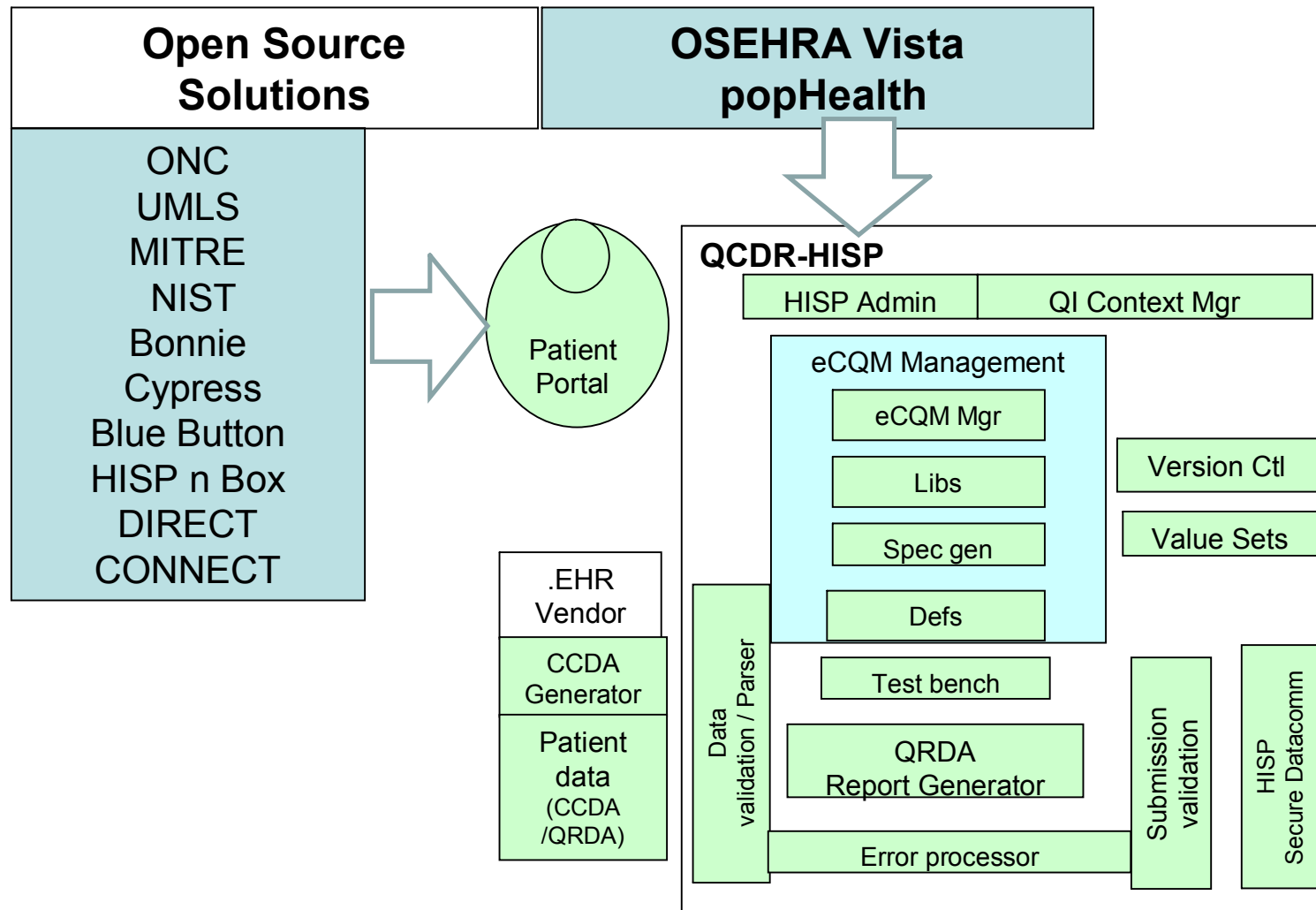


MACRA submission system OSEHRA Transition Toolkit components



MACRA System Integration

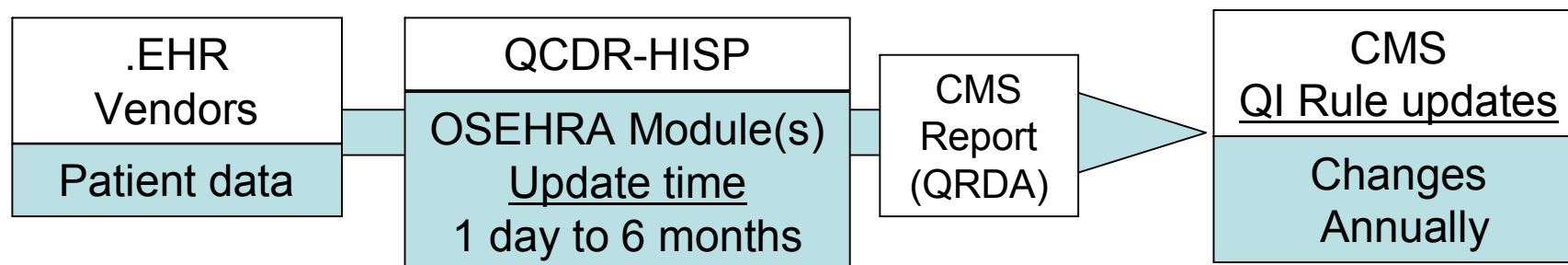
OSEHRA Transition Toolkit sources



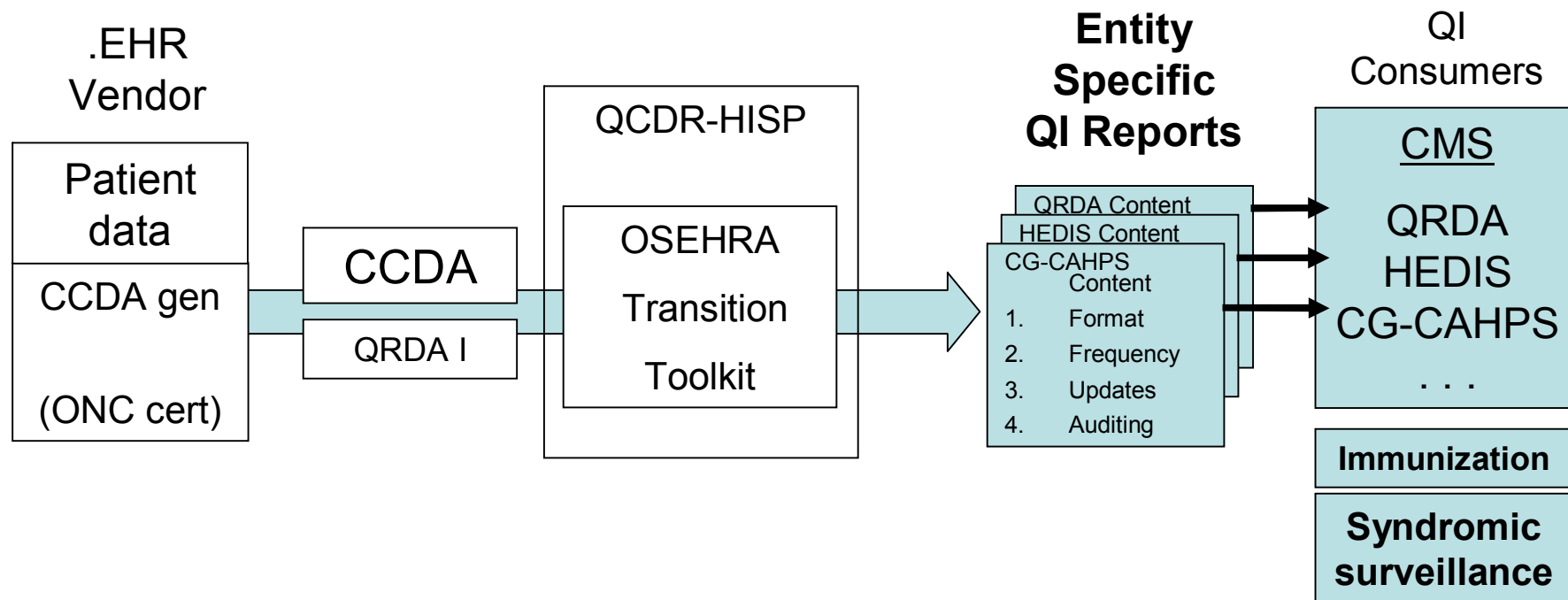
MACRA System Integration

MACRA participants have congruent schedules

- MACRA adapts QI process flow to mandates & timelines
 - Divide functions into separate modules
 - Smaller modules are more nimble
 - OSEHRA enabled MACRA system update ~ 6 months
 - .EHR + QCDR + OSEHRA = Multi-jurisdictional QI
 - Receive data from .EHR

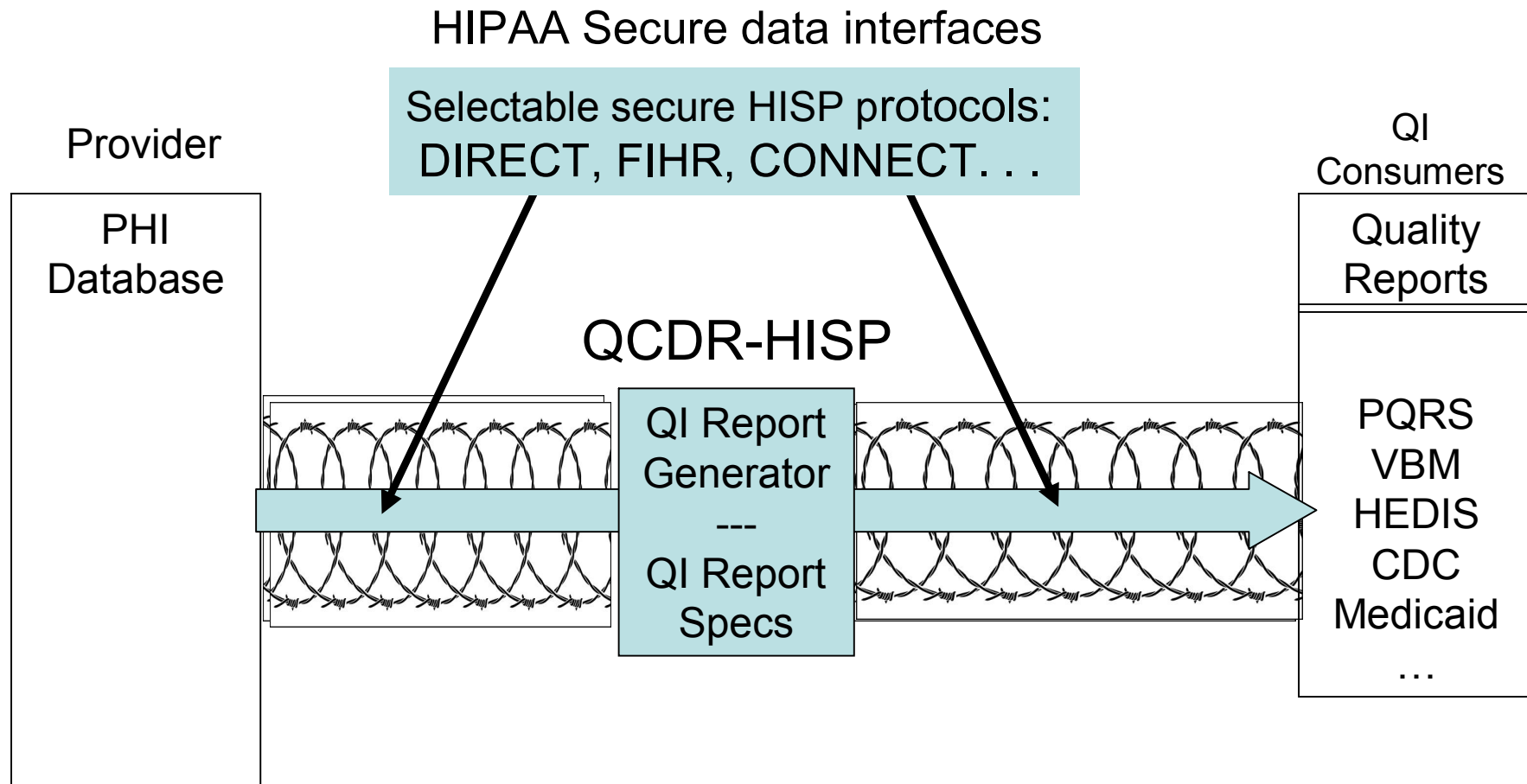


MACRA System Integration – Requirement 1: Compile Multi-Jurisdictional QI Submissions



MACRA Quality Report System protocols

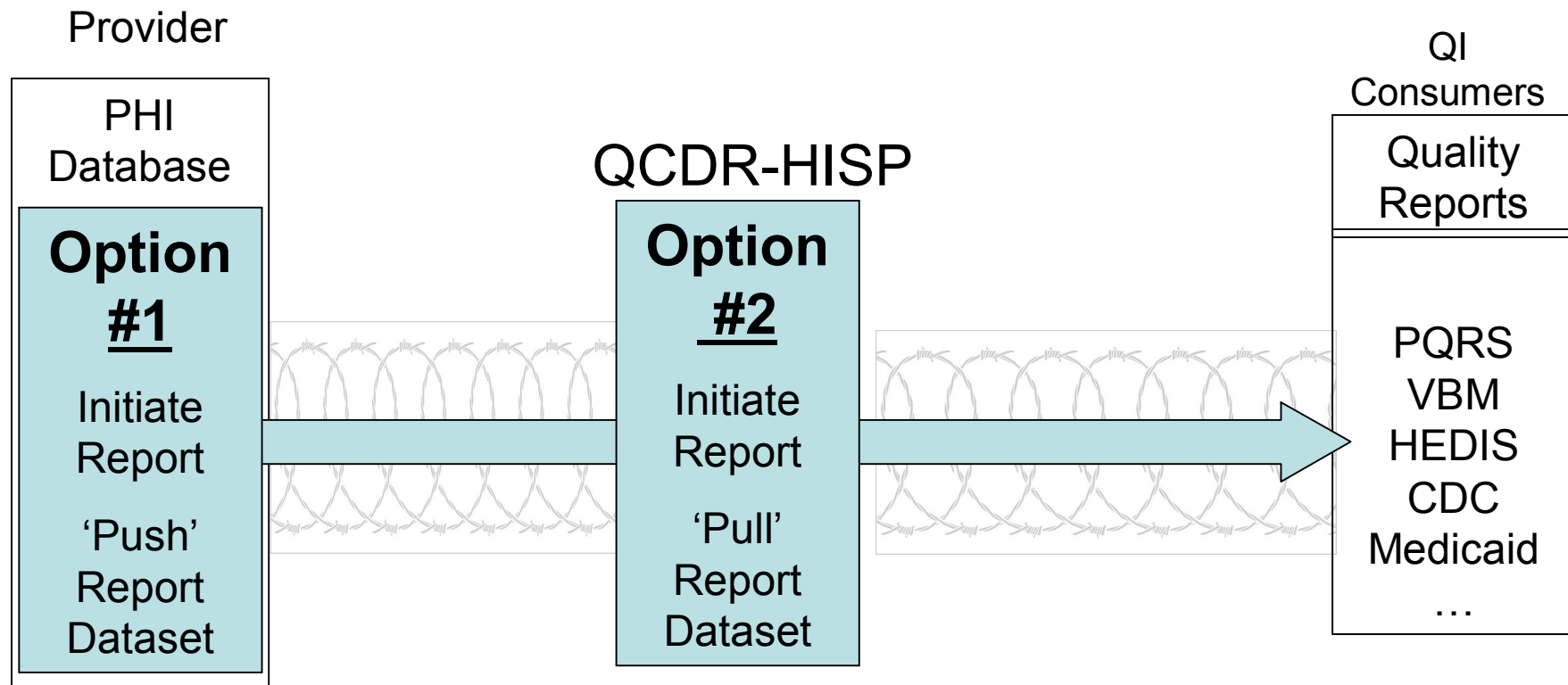
MACRA permits selection of secure protocols



MACRA - System design choice

Selectable report initiation source

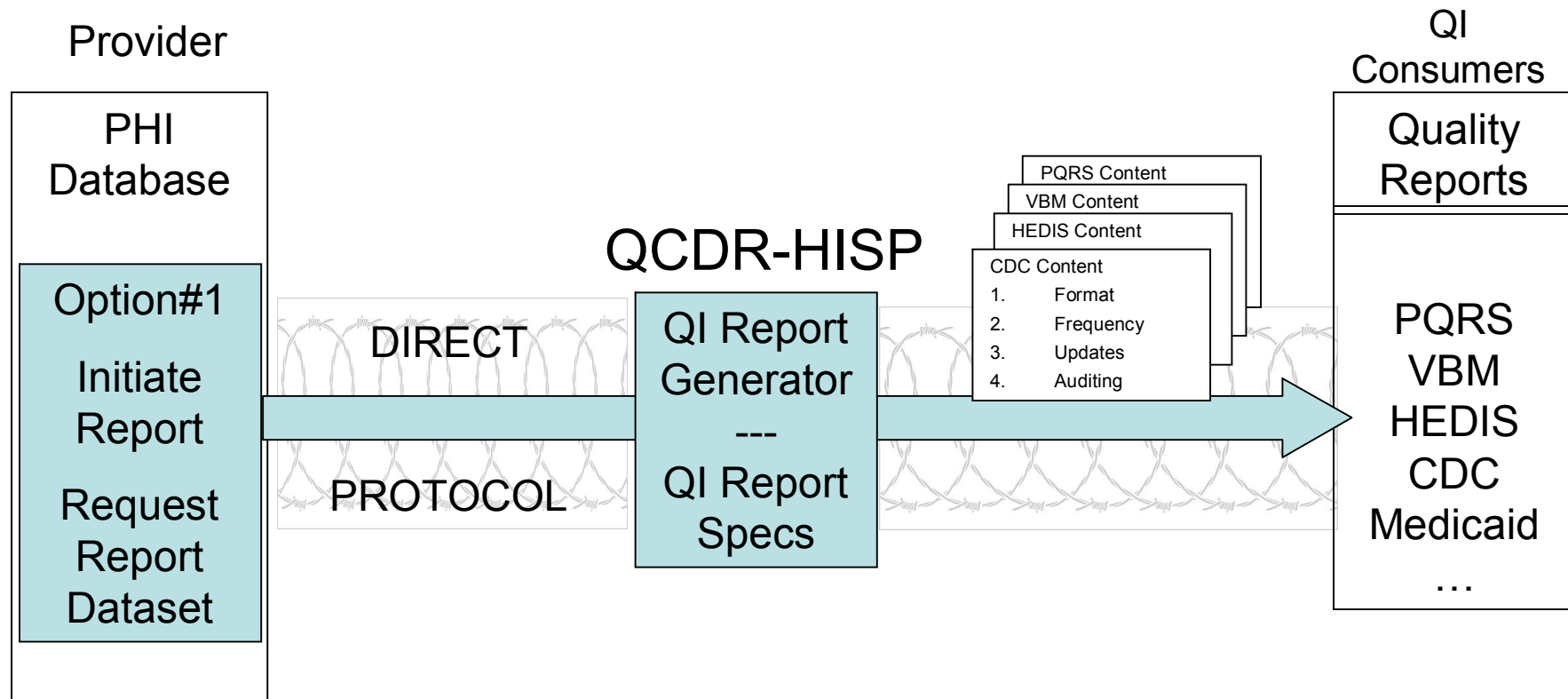
- Choice made on which participant initiates report process
- Address security issues



MACRA Quality Report System

Option #1: Provider initiation & Direct protocol

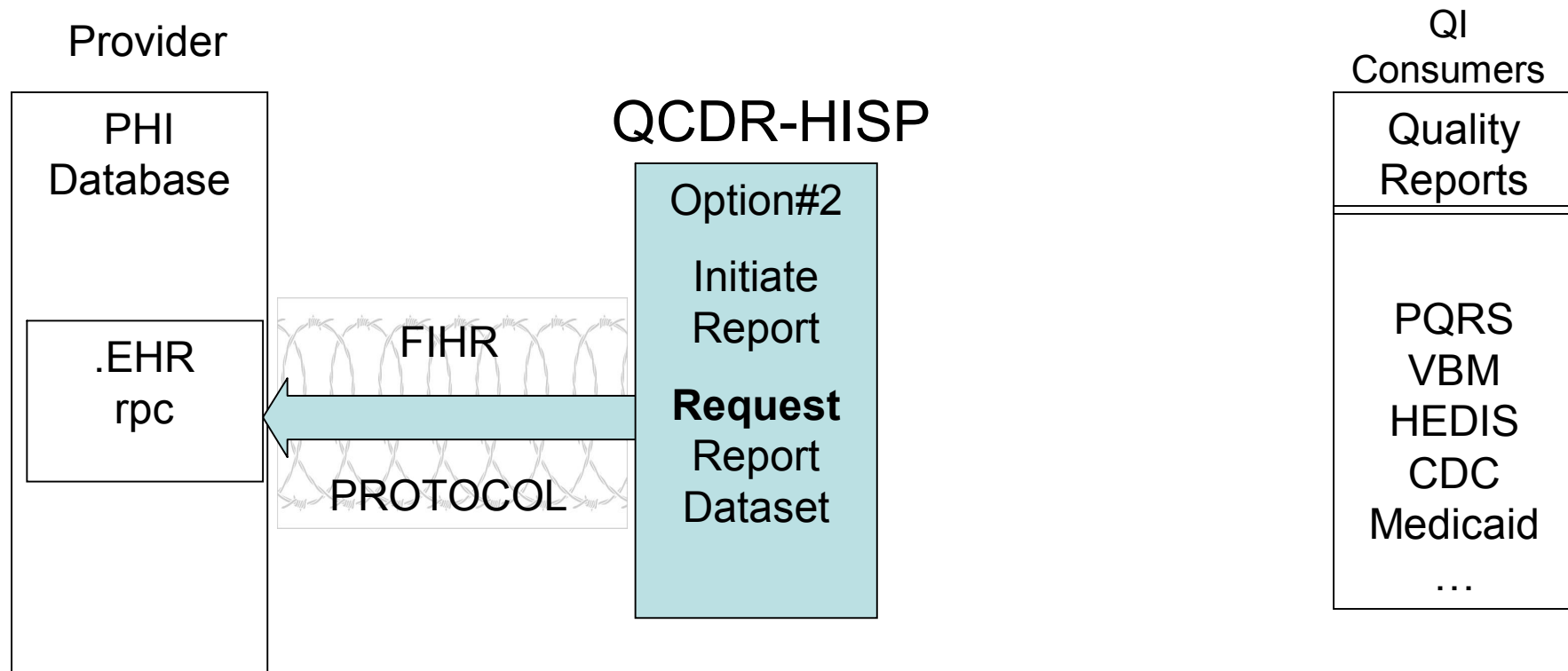
- Provider initiates report process
- Has most security, needs IT support at EP site



MACRA Quality Report System

Option #2: QCDR-HISP initiation

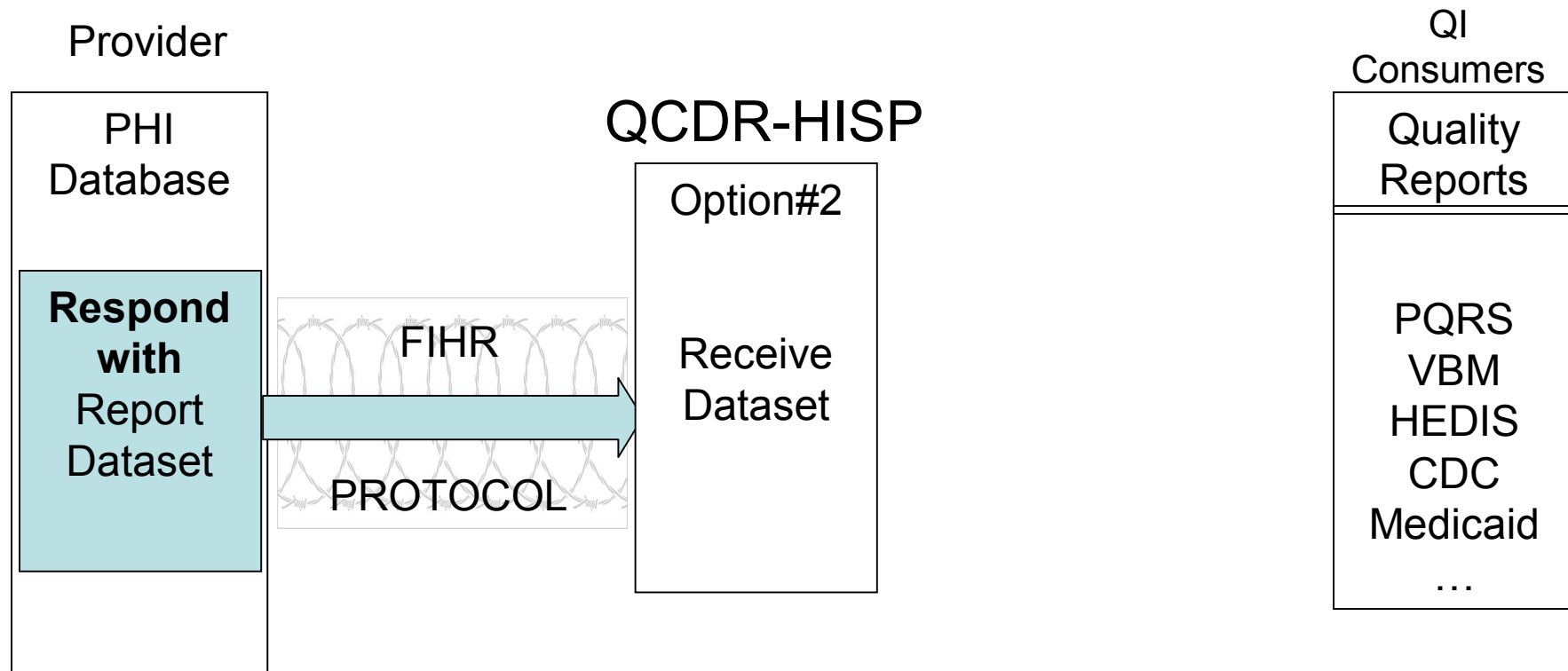
- QCDR initiates report process
- Requires rpc, reduces need for IT support at EP site



MACRA Quality Report System

Option #2: FHIR protocol => .EHR response

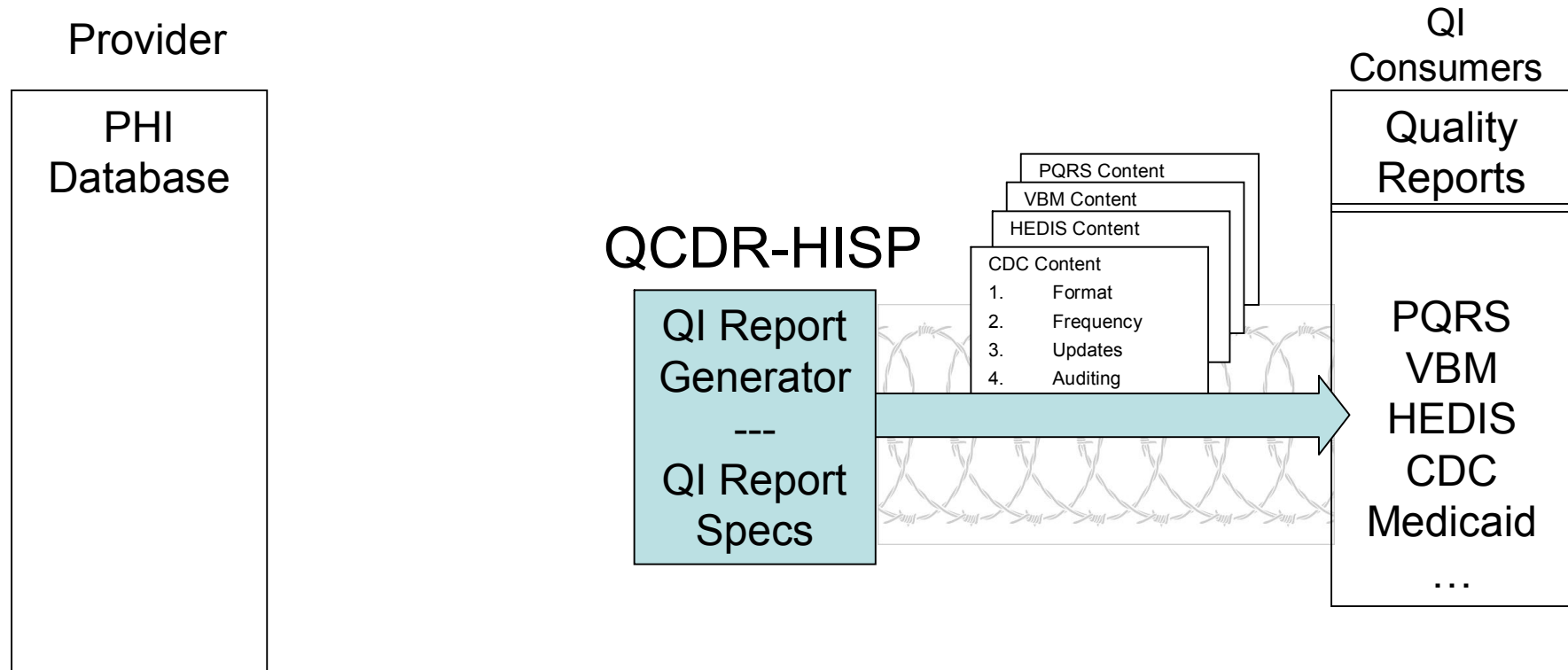
- Dataset produced by EP .EHR
- Can remotely define new dataset (if current CCDA is insufficient)



MACRA Quality Report System

Option #2: QCDR-HISP transmits submission

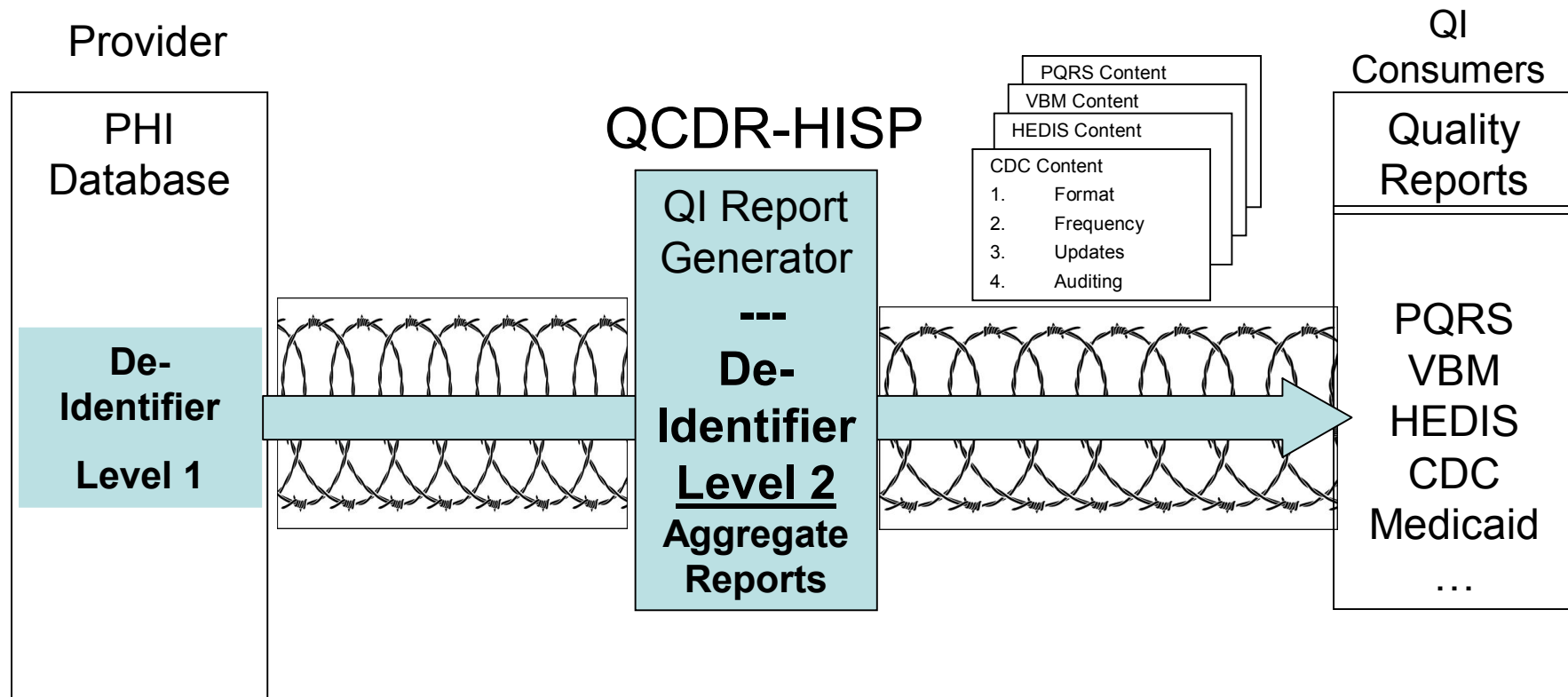
- Submission compiled by QCDR
- Process any SEVT error codes



MACRA Quality Report System

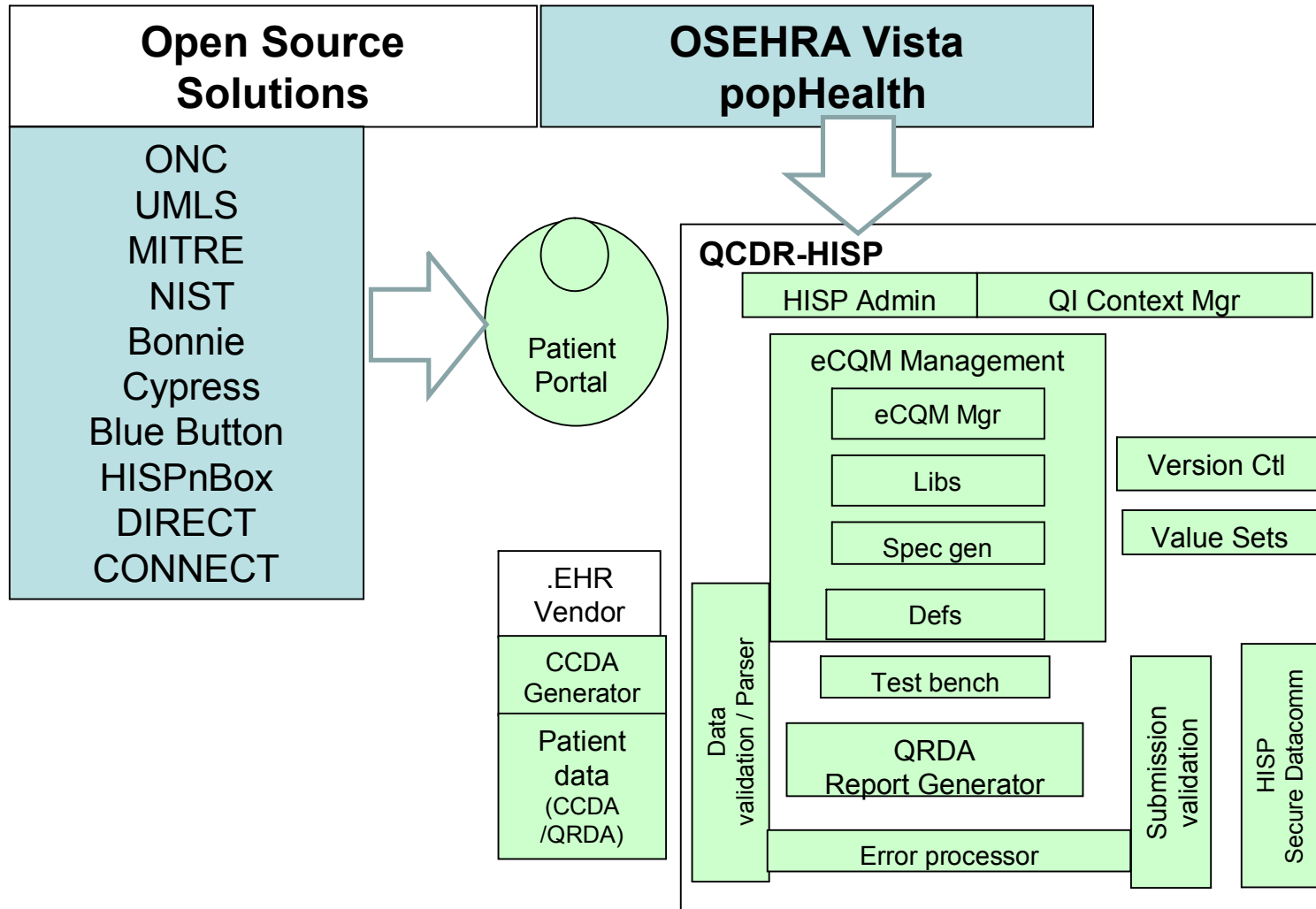
MACRA security allows staged De-Identification

- De-identification can be used for ID sensitive providers
- QRDA3 submission strips out all identifiers



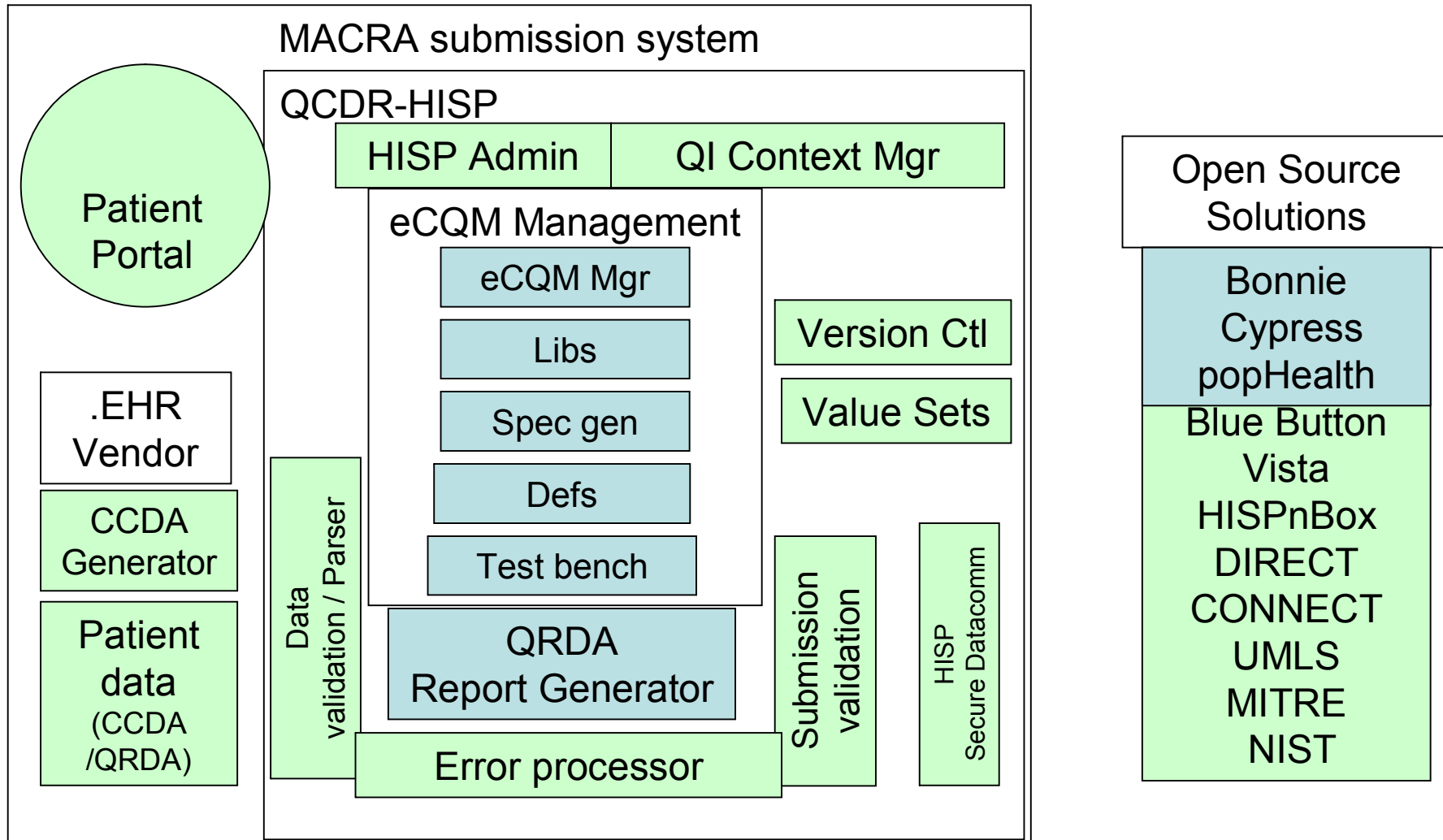
MACRA System Integration

MACRA Functional Solutions

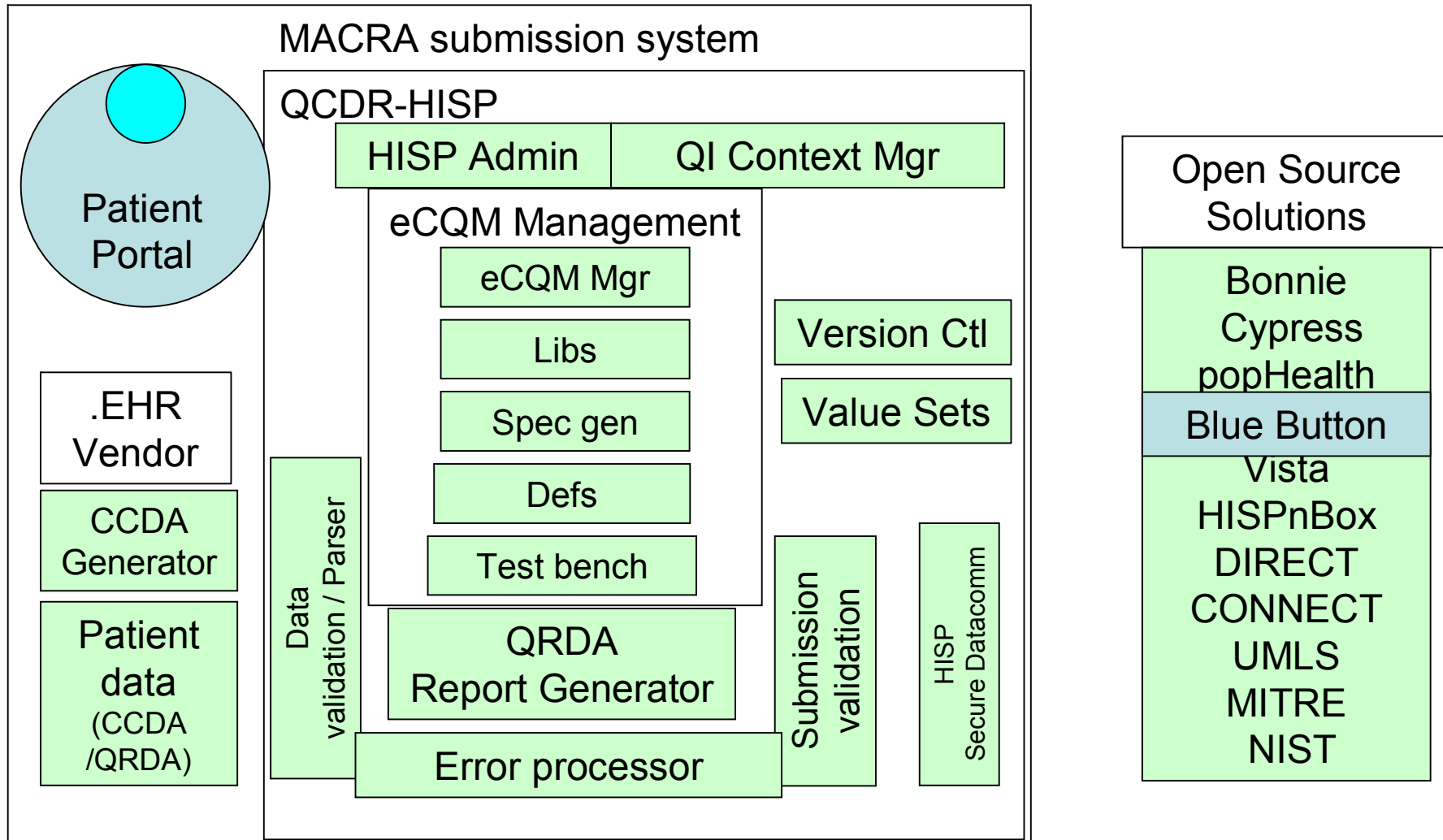


MACRA System Integration

QRDA system components

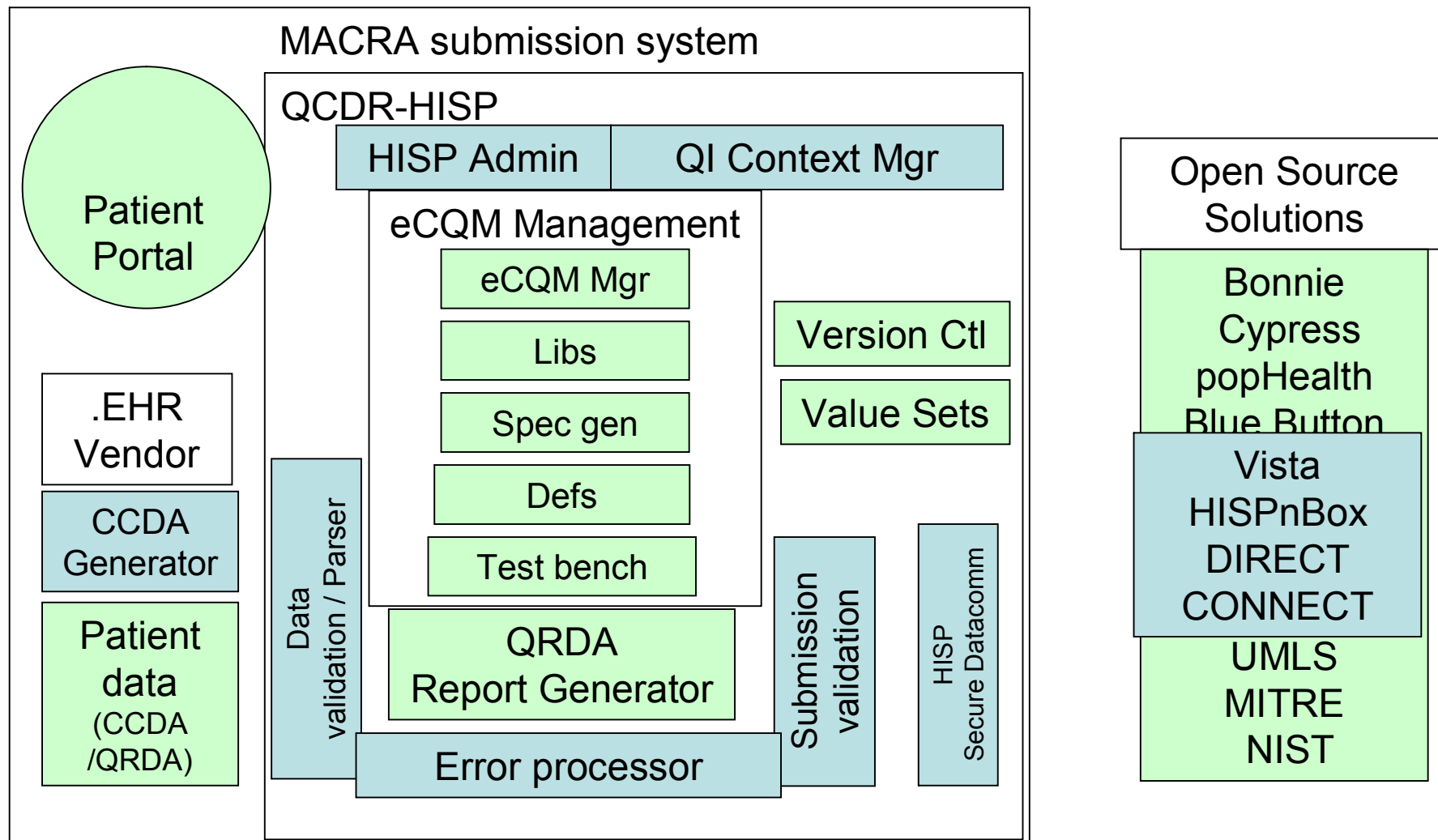


MACRA System Integration Self Report Components



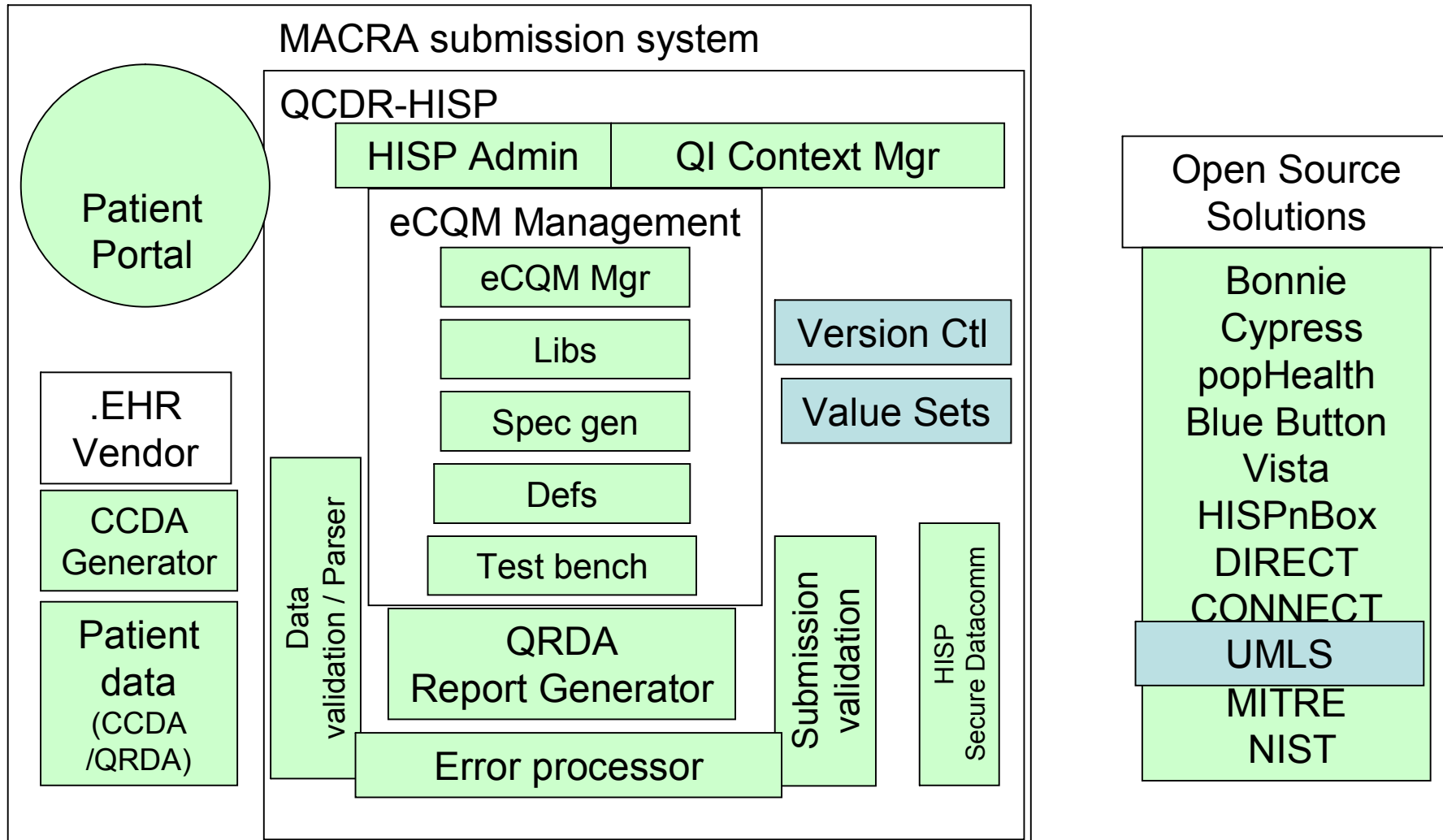
MACRA System Integration

QI Process Management Components



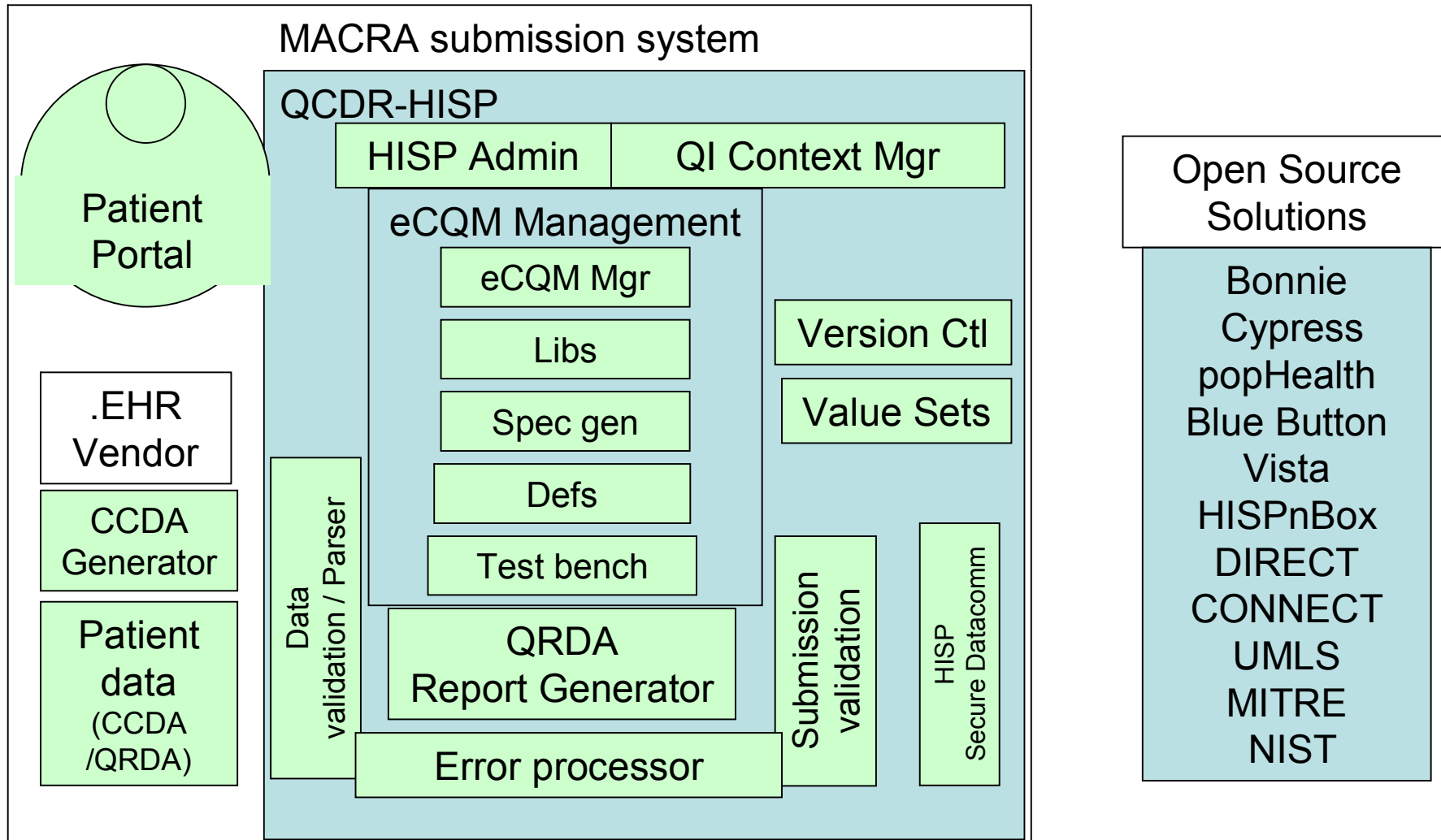
MACRA System Integration

MACRA Library Extensions



MACRA System Integration

QI Functional Solutions



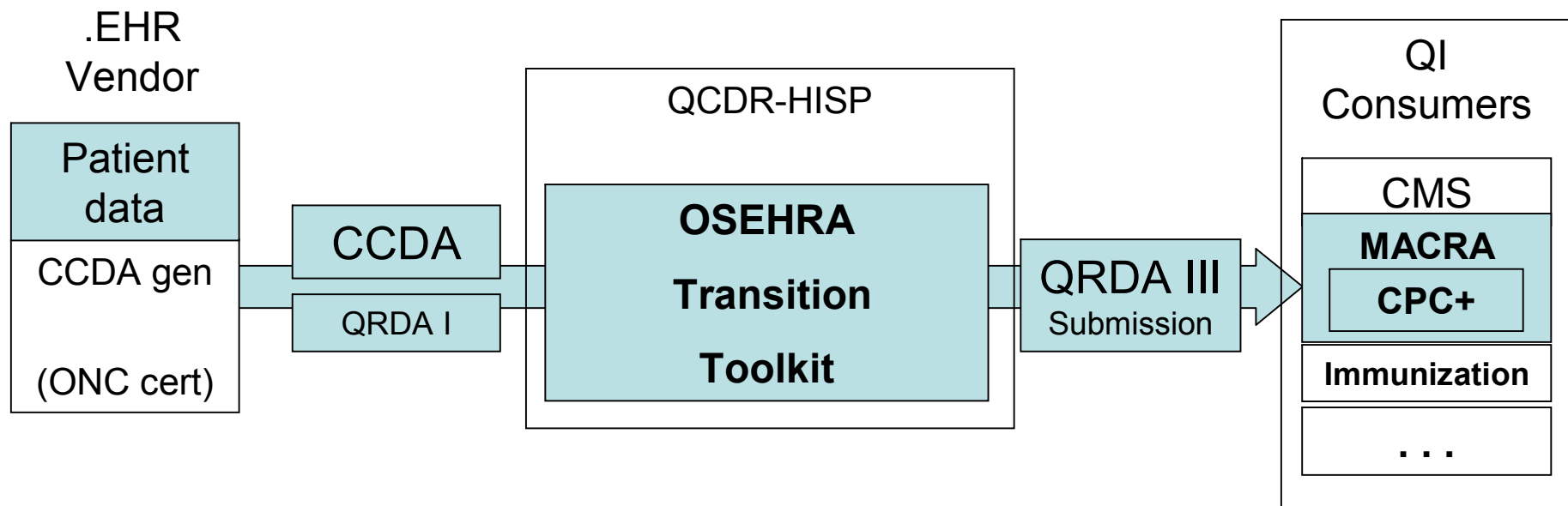
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Summary: QCDR + OSEHRA Transition Toolkit

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Questions

Questions?

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Contact Information

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Consortium for Universal Health System Metrics

Please visit www.CUHSM.org

Thank you!
For attending
the 2016
OSEHRA Summit!

