













Clinical Decision Support Program Year 2021



- Understand the Medicaid PI Program requirements for Objective 3: Clinical Decision Support (CDS)
- Understand the difference in objective 3 between Program Year (PY) 2020 and 2021.
- Learn about the documentation requirements for objective 3.



Program Year 2021 Meaningful Use Reporting Period Length

• PI (EHR) Reporting Period:

- The PI (EHR) reporting period is 90 days for all EPs.
- The PI (EHR) reporting period must be within CY 2021 and the end of the PI (EHR) reporting period must fall on or before October 30, 2021.











Objective 3 – Clinical Decision Support



- **Objective:** Implement clinical decision support (CDS) interventions focused on improving performance on high-priority health conditions.
- An EP must satisfy both measures for this objective through a combination of meeting the thresholds and exclusions.









Objective 3, measure 1



Objective 3, measure 1: Clinical Decision Support

- Measure 1: Implement five CDS interventions related to four or more eCQMs at a relevant point in patient care for the entire PI (EHR) reporting period. Absent four electronic clinical quality measures (eCQMs) related to an EP's scope of practice or patient population, the CDS interventions must be related to high-priority health conditions.
- **CDS Definition:** Health information technology functionality that builds upon the foundation of an EHR to provide persons involved in care processes with general and person-specific information, intelligently filtered and organized, at appropriate times, to enhance health and health care.



- While many providers may associate CDS with pop-up alerts, alerts are not the only method of providing support. CDS can be provided in various ways including, but not limited to:
 - Interruptive activities such as "pop-up" alerts;
 - o Information displays or links (such as InfoButton); or
 - Targeted highlighting of relevant data.
- There is no definitive or comprehensive list of what can constitute CDS. Certain types of CDS that would meet the meaningful use definition include support for public health report and patient safety reporting.
- A CDS tool could inform a provider that a patient has a reportable condition. It could then
 provide a template to ensure that the information necessary to complete reporting is captured
 and/or provide pre-populated forms needed to make the report.
 - For example, entering adverse drug events, lifestyle factors, environmental & public health issues, social determinants of health and goals for care.



- CDS may not necessarily occur at the point of care, or may not target the EP.
 Instead CDS may be more appropriately directed toward the office staff responsible for populating and submitting report forms.
- CDS in the form of documentation templates and order sets not only helps EPs remember to complete safety event reports, but it may also help them capture the data they need to do so.
 - In this case, the CDS could be explicit—such as, "here is a template for public health [or safety] reporting." Alternatively, the CDS may simply be incorporated into general templates, perhaps by adding important safety data into high-risk order templates.
 - For example, anticoagulant orders or respirator use.



- Well-designed CDS encompasses a variety of workflow optimized information tools, which can be presented to providers, clinical and support staff, patients, and other caregivers at various points in time. These may include but are not limited to:
 - Computerized alerts and reminders for providers and patients;
 - Information displays or links;
 - Context-aware knowledge retrieval specifications that provide a standard mechanism to incorporate information from online resources (commonly referred to as Info Buttons);
 - Clinical guidelines;
 - Condition-specific order sets;
 - Focused patient data reports and summaries;
 - Documentation templates;
 - Diagnostic support; or
 - Contextually relevant reference information.
- These functionalities may be deployed on a variety of platforms (e.g., mobile, cloud-based).



- EPs should implement the CDS intervention at a relevant point in clinical workflows when the intervention can influence clinical decision making before diagnostic or treatment action is taken in response to the intervention.
- The same interventions do not have to be implemented for the entire PI (EHR) reporting period as long as the threshold of five is maintained for the duration of the PI (EHR) reporting period.

- If there are limited eCQMs applicable to an EP's scope of practice, the EP should implement CDS interventions that he or she believes will drive improvements in the delivery of care for high-priority health conditions relevant to their specialty and patient population.
 - These high priority conditions must be determined prior to the start of the PI (EHR) reporting period in order to implement the appropriate CDS to allow for improved performance.
- CDS interventions are not required to be related to the same eCQMs that an EP has chosen to report. The CDS intervention should be aimed at prospectively advancing the same clinical goal or guideline promoted by the eCQM.
- Drug-drug and drug-allergy interaction alerts are separate from the five CDS interventions and do not count toward the five required for measure 1.



Changes from PY 2020 to 2021

Reporting Periods	2020	2021
PI (EHR) 90-Day Reporting Period	Falls within entire CY 2020	Falls within CY 2021 but ends on or before October 31, 2021



Clinical Decision Support Exclusions

• Exclusion:

- EP is not required to submit data or meet the measure.
- EP must submit documentation of how he/she met the exclusion.

Exclusion for Objective 3, Measure 1 CDS Interventions:

- No allowable exclusions available
- EPs must meet the measure



Documentation for Clinical Decision Support

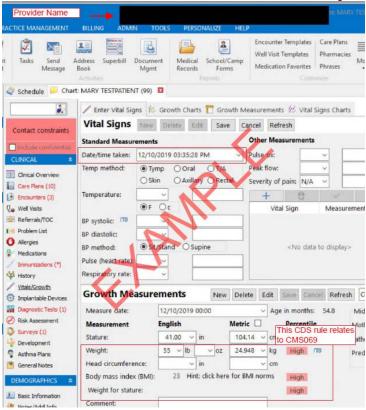
- Documentation submitted should:
 - Include the provider and/or practice name;
 - Five CDS interventions related to four or more eCQMs* were enabled;
 - Be clearly legible; and
 - Reflect the date the requirement was met during the PI (EHR) reporting period**.
- For example, screen shots from the CEHRT or vendor letters to support the five CDS rules were enabled.

^{**}See slide 3 for more information regarding an appropriate PI (EHR) reporting period.



^{*}Absent four eCQMs related to an EPs scope of practice or patient population, the CDS interventions must be related to high-priority health conditions.

Documentation Examples



^{*}Ensure documentation includes the items listed on slide 15 and is dated appropriately.



Documentation Examples



795 Horsham Road Horsham, PA 19044 P 215 657 7010 nextgen.com

October 22, 2019



RE: Clinical Decision Support

To Whom It May Concern:

This letter is to provide additional information regarding Clinical Decision Support (CDS) rules, including drug/drug and drug/allergy interaction checks within NextGen® Enterprise EHR (formerly, NextGen® Ambulatory EHR) as utilized by the below providers:

Provider Name	Reporting period	
	August 1, 2015 - October 29, 2015	

NextGen® Enterprise EHR is an ONC-certified EHR. Using our certified EHR technology, your organization implemented Drug Utilization Review (DUR), including drug/drug and drug/allergy interaction precautions, as required under the CDS specification published by the Centers for Medicare and Medicaid Services.

In addition, the above listed providers had access to other clinical decision support capabilities native to their software environment, including but not limited to

- Drug/condition precautions (displays by default)
- Geriatric and Pediatric drug precautions (can be disabled only with System Admin access)
- Medication dosing guidelines (cannot be disabled)
- Alerts for abnormal vital signs (cannot be disabled)
- Links to resources from Problems/Diagnoses, Medications, Procedures and Orders modules (default links shipped with software can only be removed from System Admin; other links can be added or removed from Preferences/Utilities)
- Order sets based on condition (default order sets are native to UI; additional order sets can be added by practice)
- Due and Past-due Immunizations (cannot be disabled)
- . Lab result alerts (age and condition-specific) (cannot be disabled)
- Health Promotion Plan (condition-specific) (cannot be disabled)

^{*}Ensure documentation includes the items listed on slide 15 and is dated appropriately.











Objective 3, measure 2



Objective 3, measure 2: Drug-Drug & Drug-Allergy Interaction Checks

 Measure 2: Enable and implement the functionality for drug-drug and drug-allergy interaction checks for the entire PI (EHR) reporting period.



Changes from PY 2020 to 2021

Reporting Periods	2020	2021
PI (EHR) 90-Day Reporting Period	Falls within entire CY 2020	Falls within CY 2021 but ends on or before October 31, 2021



Exclusions

Exclusion:

- EP is not required to submit data or meet the measure.
- EP must submit documentation of how he/she met the exclusion.

Exclusion for Objective 3, Measure 2 CDS Drug-Drug & Drug-Allergy:

Number of medication orders criteria



Exclusions for Drug-Drug & Drug-Allergy Interaction Checks

 Measure 2 – An EP may take an exclusion for measure 2 if the EP writes fewer than 100 medication orders during the PI (EHR) reporting period.



Exclusion Documentation for Drug-Drug & Drug-Allergy Interaction Checks

Exclusion Documentation

- Writes fewer than 100 permissible prescriptions.
 - The CEHRT dashboard shows that the EP wrote fewer than 100 medication orders during the PI (EHR) reporting period; or
 - Provide supporting documentation, other than the CEHRT dashboard, that demonstrates the EP has fewer than 100 medication orders.



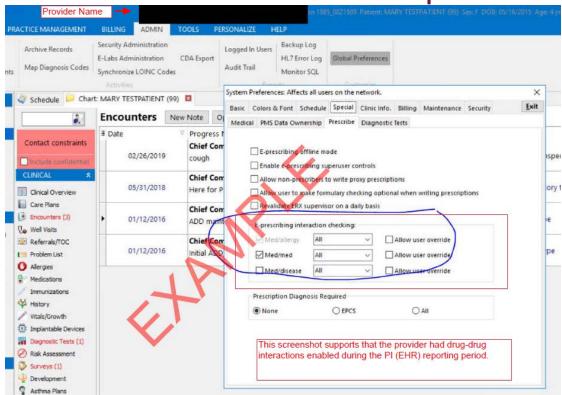
Documentation for Drug-Drug & Drug-Allergy Interaction Checks

- Documentation submitted should:
 - Include the provider and/or practice name;
 - Drug-drug and drug allergy interaction checks were enabled;
 - Be clearly legible; and
 - Reflect the date the requirement was met during the PI (EHR) reporting period*.
- For example, screen shots from the CEHRT or vendor letters to support drug-drug and drug-allergy interaction checks were enabled.

^{*}See slide 3 for more information regarding an appropriate PI (EHR) reporting period.



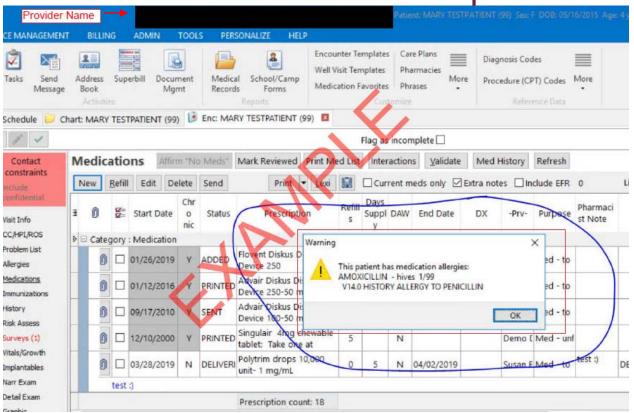
Documentation Examples



^{*}Ensure documentation includes the items listed on slide 24 and is dated appropriately. For example, the screen shot could include the toolbar on the bottom right of the screen to show the date the screen shot was taken. The date needs to be within the PI (EHR) reporting period.



Documentation Examples



^{*}Ensure documentation includes the items listed on slide 24 and is dated appropriately.











Audit Findings



What Happens During an Audit?

- All providers that receive a Medicaid PI incentive payment could potentially be selected by AHCCCS for post-payment audit.
- If selected, AHCCCS post-payment analysts will conduct a thorough review of the documentation attached to the EP's attestation in ePIP to determine if it meets the program requirements.
- AHCCCS may have follow-up questions or make additional documentation requests.



Common Audit Findings

- Failure to provide sufficient documentation for eRx, CDS, and CPOE objectives.
- The CEHRT dashboard does not show the PI (EHR) reporting period or EP name.
- Failure to maintain proper documentation and practice no longer has access to the CEHRT.
- Supporting documentation does not have the appropriate dates.
- Including data for the entire practice in the reported CEHRT report rather than data for the individual EP.



Resources

- CMS Objective 3 Tip Sheet
- CMS CDS Tip Sheet
- <u>Federal Final Rule Modified Stage 2 and Stage 3</u>
- AHCCCS Program Year 2021 Clinical Decision Support FAQ*
- AHCCCS Documentation Retention Webinar**

^{**}To access the AHCCCS webinar click the drop down arrow labeled "Webinars for MU Objectives & eCQMs". An updated Documentation Retention webinar for PY 2021 is planned for March 25, 2021.



^{*}To access the FAQ click on the link above, then click on the drop down arrow labeled "Frequently Asked Questions".

Contact Information

Agency	Help With	Email	Phone
AHCCCS	PI Program	EHRIncentivePayments@azahcccs.gov	(602) 417-4333
Health Current	Educational Assistance & Support	ehr@healthcurrent.org	(602) 688-7210



Questions?



Thank You.

