

**How Can Eligible Hospitals Meet
Ongoing Submission
for the
Reportable Laboratory Results
Meaningful Use Objective?**

PH-EHR Vendors Collaboration Initiative Meeting

August 19, 2014

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Reportable Laboratory Results Reporting - Ongoing Submission

Key Points to Consider

- Some Eligible Hospitals/Critical Access Hospitals (EHs/CAHs) do not perform laboratory testing for any conditions reportable in their jurisdiction
- Some EHs/CAHs do not perform laboratory testing for any reportable conditions for which their public health agency is capable of accepting data for the Reportable Laboratory Results (RLR) objective
- Some EHs/CAHs use reference labs and/or commercial labs to perform some or all testing for reportable conditions
- Some jurisdictions have reporting requirements for ordering facilities, in addition to reporting requirements for performing labs

Reportable Laboratory Results Reporting - Ongoing Submission

Key Points to Consider (Continued)

- EHs/CAHs that do not have any reportable results may be able to take an exclusion for the RLR measure
 - CMS FAQ #9204 - <https://questions.cms.gov/faq.php?id=5005&faqId=9204>
- MU does not preempt applicable state or local laws that govern reporting
 - Excerpt from the CMS Stage 2 Final Rule (Page 54022)
The “in accordance with applicable law” phrase allows public health authorities to utilize their existing laws and regulations for reporting.
- Achieving ongoing submission for the RLR MU Measure does not necessarily mean the EH has satisfied their public health jurisdictional reporting requirements.

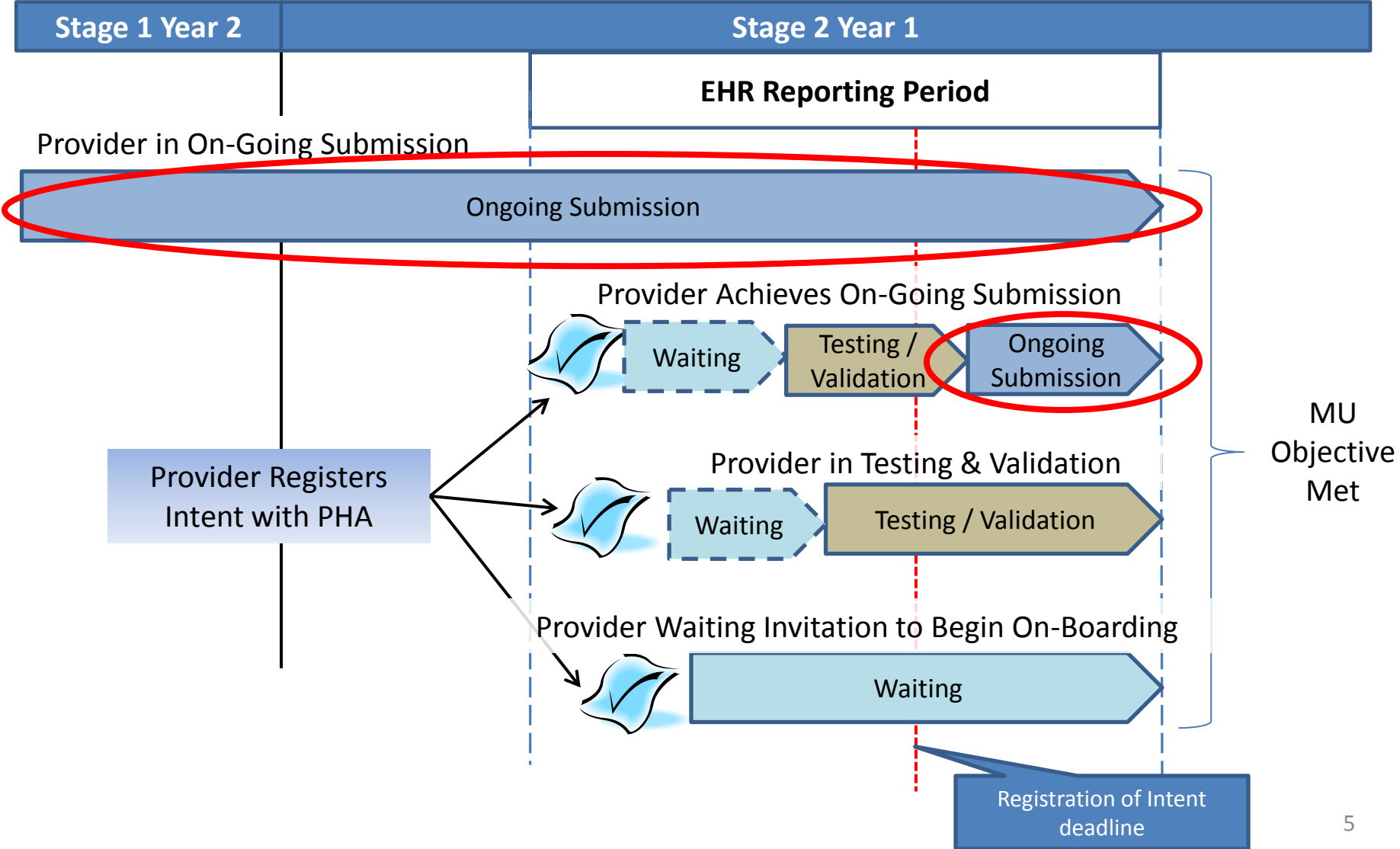
Reportable Laboratory Results Reporting - Ongoing Submission

Key Points to Consider (Continued)

- To meet MU requirements the RLR submissions must:
 - Originate from Certified Electronic Health Records Technology (CEHRT), and
 - The information sent from CEHRT must be formatted according to the standards and implementation specifications mandated for the RLR objective
 - And follow any further local constraints on the message
- *Meeting Meaningful Use – Stage 1*
 - *Submission of test message*
- *Meeting Meaningful Use – Stage 2*
 - *Meeting any the criteria CMS established under the umbrella of ongoing submission (details on the next slide)*
 - ***Ongoing submission, is more than an endpoint. Ongoing submission includes the entire onboarding process from a declaring intent, ongoing engagement in the testing process through, and including, reaching production status***

Reportable Laboratory Results Reporting - Ongoing Submission

Stage 2 Criteria for Meeting PH MU Measures



Reportable Laboratory Results Reporting - Ongoing Submission

Example Real Life Inquiries:

- An EH is asking a reference lab, that has CEHRT, to establish ongoing submission with the public health agency so the EH can meet the RLR measure. The jurisdiction requires ordering facilities to ensure that reference lab results are properly reported to public health. What is required for the EH use the reporting from the reference lab to count for MU?
- PHA states there are EHs in the state who do not test any reportable conditions in house – all testing is done by a reference lab. The state does require that both the testing and ordering facility report conditions. Some of these reference labs are in the process of building interfaces with CEHRT, however others are in limbo. How can these EHs meet MU?

Reportable Laboratory Results Reporting - Ongoing Submission

Example Real Life Inquiries (Continued):

- An EH uses a reference laboratory for a portion of their microbiology testing. The results from this reference lab are not compliant with MU. If state law requires that all results done by a hospital or received by a hospital must be reported, does that mean that the hospital has to report all the results to meet MU?
- An EH does not test any reportable conditions in house – all testing is done by a reference lab. The state only requires the performing lab to report. Can the EH take an exclusion for the RLR objective?

Reportable Laboratory Results Reporting - Ongoing Submission

What types of RLR reporting could EHs/CAHs count for ongoing submission in MU?

Any one or combination of the following could count as ongoing submission for the RLR Measure

- Submitting reportable lab result using CEHRT to public health for testing performed by the EH/CAH
- Submitting reportable lab results using CEHRT to public health for testing ordered by the EH/CAH and performed by a reference/commercial lab
- Reference/commercial lab submitting reportable lab results using CEHRT to public health on behalf of the EH/CAH for testing ordered by the EH/CAH

Reportable Laboratory Results Reporting - Ongoing Submission

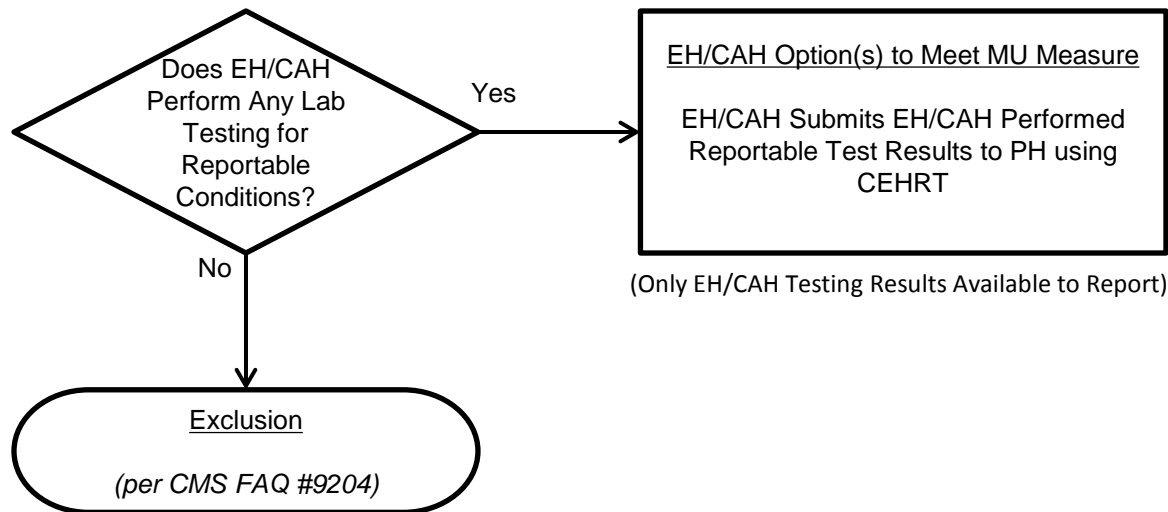
Decision Flows for the Ongoing Submission Options

- The following flow charts help answer the question of what ongoing submission options an EH/CAH may be able to count for the RLR objective, considering:
 - Lab testing performed by the EH/CAH
 - EH's/CAH's use of reference/commercial labs
 - Jurisdictional reporting requirements for ordering facilities
- These following flow charts also help answer the question when an EH/CAH may meet an exclusion for the RLR objective

Decision Flow for EH/CAH Reporting Options to Meet MU RLR Objective/Measure

When Jurisdiction **Does Not Require** Ordering Facility to Report Results from Reference Laboratory

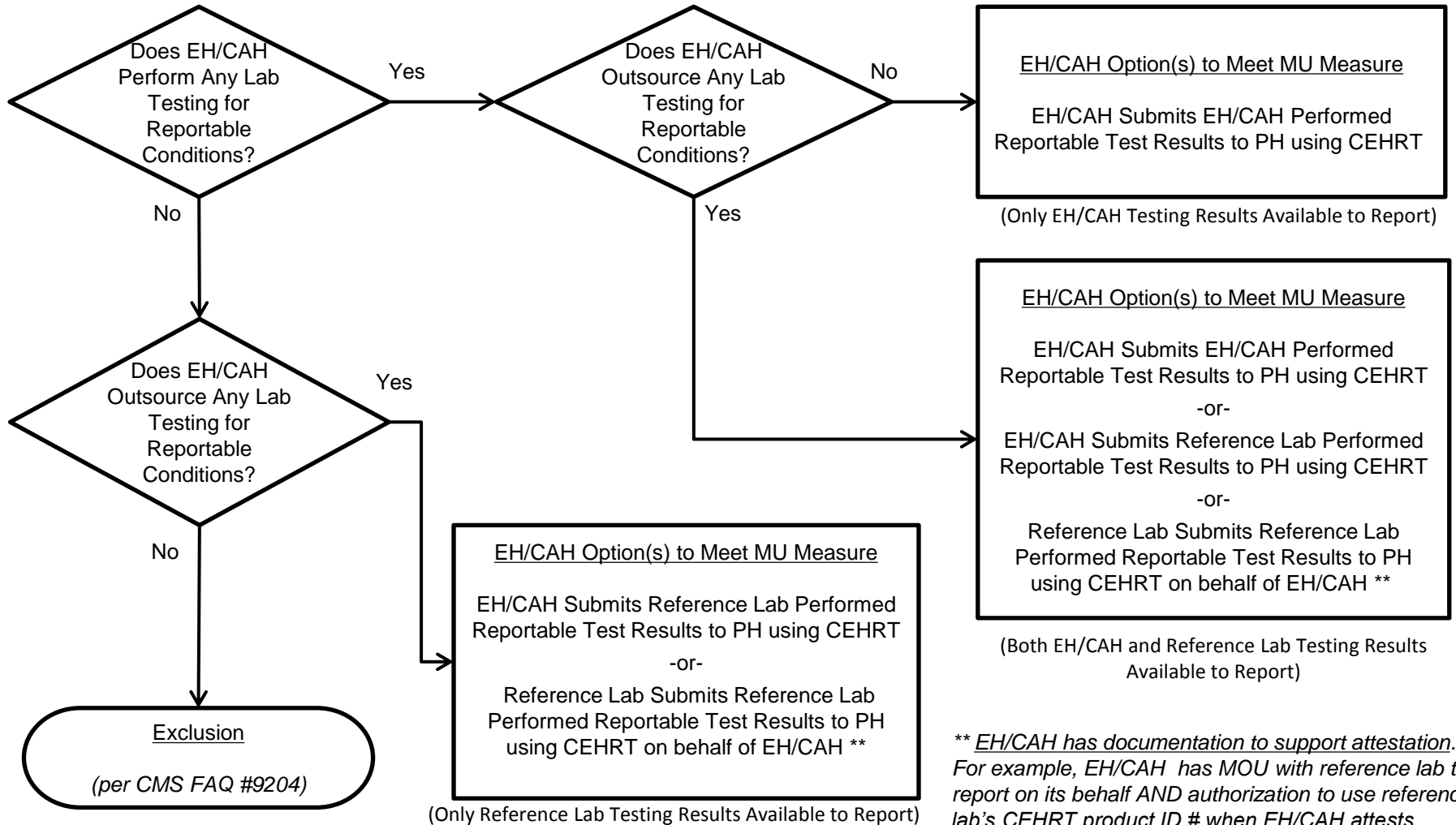
Important: This decision flow only addresses options for EHs/CAHs to meet the MU RLR measure, it does not show how an EH/CAH or a reference lab fulfills their jurisdictional reporting requirements. The MU criteria for this objective do not preempt otherwise applicable state or local laws that govern reporting to public health.



Decision Flow for EH/CAH Reporting Options to Meet MU RLR Objective/Measure

When Jurisdiction **Requires** Ordering Facility to Report Results from Reference Laboratory

Important: This decision flow only addresses options for EHS/CAHs to meet the MU RLR measure, it does not show how an EH/CAH or a reference lab fulfills their jurisdictional reporting requirements. The MU criteria for this objective do not preempt otherwise applicable state or local laws that govern reporting to public health.



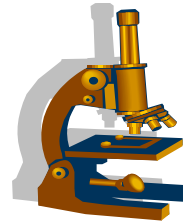
**** EH/CAH has documentation to support attestation. For example, EH/CAH has MOU with reference lab to report on its behalf AND authorization to use reference lab's CEHRT product ID # when EH/CAH attests**

EH/CAH Reporting Options to Meet MU RLR Objective/Measure

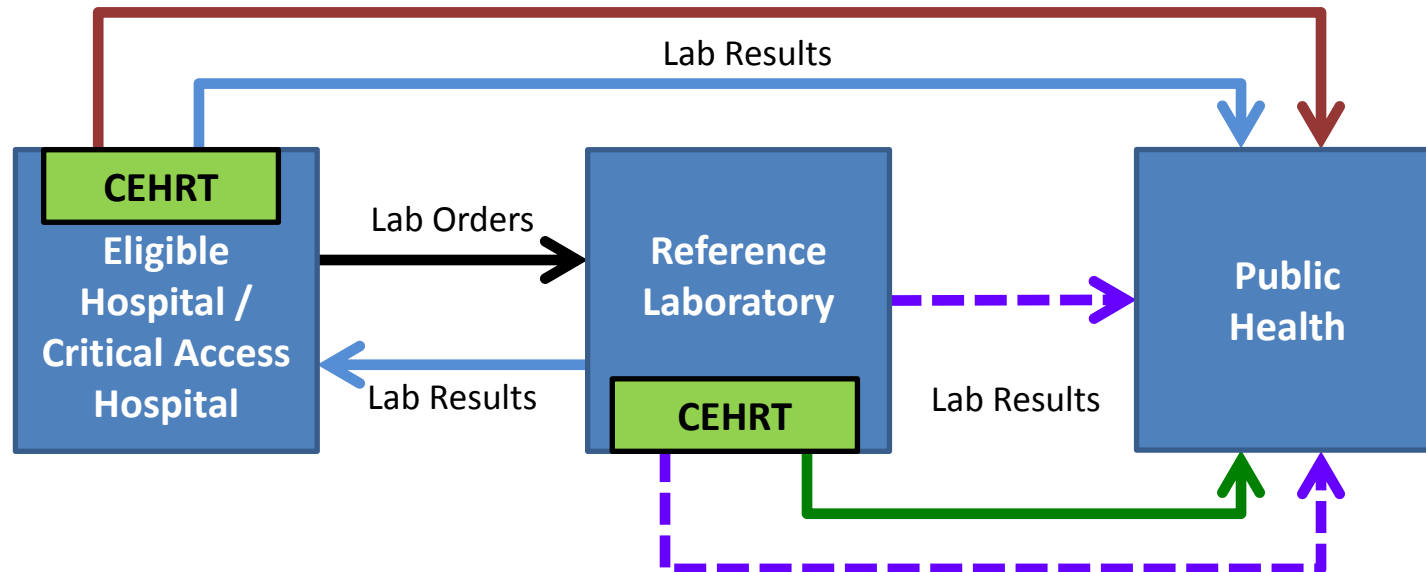
Hospital



Reference Laboratory



Public Health



Meets MU



EH/CAH submits reportable results from testing performed in-house to PH

Yes



EH/CAH submits reportable results from testing performed by reference lab to PH

Yes



Reference lab submits reportable test results to PH on behalf of EH/CAH

Yes



Reference lab submits reportable test results to PH (not part of MU)

No