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Meaningful Use Webinar ...**

We will be starting momentarily

Please remember to put your phones on mute.

August 24, 2011



Meaningful Use and You

Project Management Tips

Services
Complete
Solutions

Presented By:
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August 24, 2011

Agenda



- ▶ The Background
- ▶ Requirements and Definitions
- ▶ Quality Measure Reporting
- ▶ Initial Project Planning
- ▶ Analysis
- ▶ Project Planning and Timelines
- ▶ Environment Strategy
- ▶ The Team
- ▶ Implementing Objectives and Quality Measures
- ▶ Looking Ahead/Summary

Background



- In a nutshell, Meaningful Use is a government incentive program to reward eligible hospitals (EH) and eligible professionals (EP) who invest in electronic health records.
- To receive incentive payments, EHs or EPs must not only purchase EHR software, but they also must show that they're using it in a meaningful way.
- To demonstrate this "meaningful use," CMS established a set of objective measures that reflect a basic level of EHR adoption.
- Objectives include maintaining lists of a patient's medications, problems, and allergies; providing patients with electronic copies of their records; and electronically communicating with other providers, hospitals, and pharmacies.

Background



- To look a little more closely at the Meaningful Use requirements, there are 25 objectives for EPs and 24 objectives for hospitals.
- Many of the objectives overlap, but a few are unique to one group or the other. Each objective is defined as either a core or menu objective. EPs and EHs must report on and meet thresholds for all core objectives (15 for EPs and 14 for hospitals) and 5 of the 10 menu objectives.
- For quality measures, hospitals must report on a set of 15 measures (none of these measures are menu).
- There are far more measures (44) for EPs, but EPs need to report on a subset of 6 measures (3 core that they need to report and 3 that they select from a large menu).
- Finally, the Meaningful Use regulations provide exclusions for EPs or hospitals where an objective might not apply. For example, EPs who don't prescribe many medications don't need to report on whether they prescribe medications electronically.

Definitions



Core Objectives:

This set of objectives is required for everyone participating in Meaningful Use. Eligible hospitals and EPs must meet the specified threshold for all Core objectives.

Exclusion Criteria:

Some objectives specify criteria that can exclude a hospital or EP from reporting on those objectives.

For example, an EP who doesn't administer any immunizations during a reporting period is excluded from the objective to submit data electronically to immunization registries.

Menu Objectives:

A set of optional objectives from which eligible hospitals and EPs must select all but 5 of these objectives to report on.

The language "all but 5" is used because if a hospital or EP is excluded from a Menu objective, the EP or hospital can report on one fewer menu objective.

For example, if an EP is excluded from one Menu objective, she/he must report on only four of nine Menu objectives.

Definitions – Cont'd



Public Health Objectives:

A set of three objectives that involve submitting data to public health agencies.

All of these objectives are in the Menu set, however, EPs and hospitals must select at least one of these objectives for attestation.

Core Quality Measures:

A set of quality measures that all EPs and hospitals must report on.

Note that all 15 quality measures for hospitals are core quality measures.

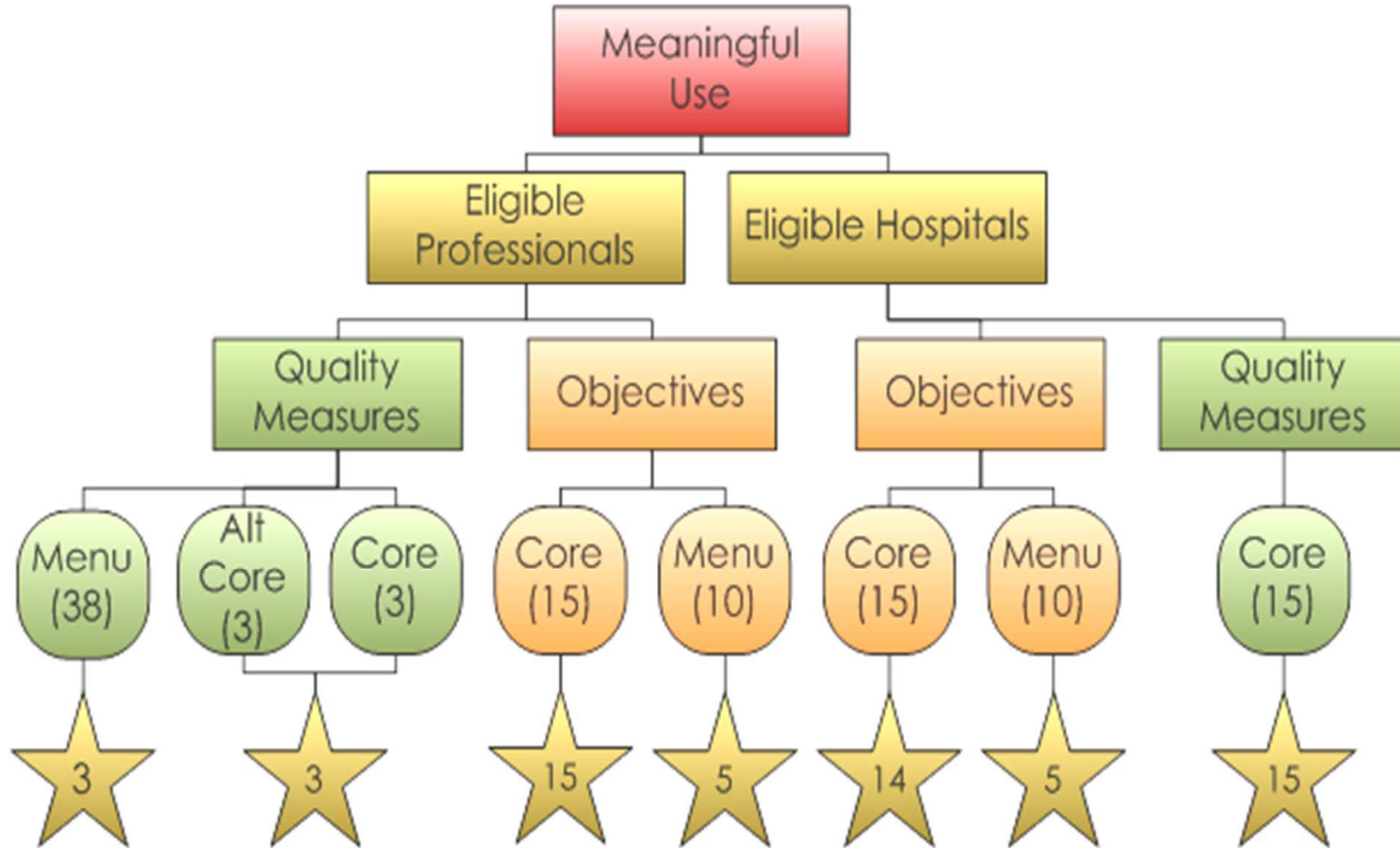
Alternate Core Quality Measures:

A set of quality measures that EPs can select from if one or more of the Core measures do not apply to that EP's scope of practice.

Menu Quality Measures:

A set of quality measures from which an EP must select 3 to report on.

Structure



Attestation Requirements



The following chart and definitions describe the information that must be submitted:

	EPs	Hospitals
Report on set of Core objectives	15 objectives	14 objectives
Report on set of Menu objectives	All but 5	All but 5
Report on at least one Public Health Menu objective	1 of 2	1 of 3
Report on set of Core quality measures	3 quality measures	15 quality measures
Report on set of Alternate Core quality measures	Up to 3 (used only if core measures do not apply)	NA
Report on set of Menu quality measures	3 of 38	NA

Initial Project Planning

Additionally, you'll need to become very familiar with the set of documents that will help you make decisions and configure your system appropriately for Meaningful Use. *Government Regulations*

- **EHR Incentive Program Final Rule:** The Final Rule is the primary Meaningful Use regulation. It was published on July 13, 2010, and provides details about all of the objectives, quality measures, and other aspects of Meaningful Use.
- **EHR Certification Final Rule:** This Final Rule includes the requirements and specifications that an EHR must meet to be certified for Meaningful Use.
- **Quality Measure Specifications:** These specifications detail the logic and data elements used for quality measure calculations.
- **CMS FAQ:** CMS releases clarifications and corrections for Meaningful Use objective and quality measure requirements through the FAQ on their website. It is important that you review all previous FAQs and new and updated FAQs as they are posted.
- **ONC FAQ:** Like the CMS FAQ, the Office of the National Coordinator (ONC) releases clarifications and corrections, but their clarifications pertain to certification requirements. You should also review and continue to track FAQs released by ONC.

Initial Project Planning - Cont'd



High Level Project Structure

- Think of Meaningful Use as a large collection of subprojects.
- Break it up so that each objective and quality measure becomes a unique subproject.

Some of these subprojects will be small and composed of only a few tasks, while others might be very large and require their own project plans and even other project managers.

- Identify subproject owners who report progress to you at regular checkpoints.

Because most objectives don't require significant work, you'll be able to assign multiple objectives or quality measures to a single owner.

Initial Project Planning - Cont'd



Initial Project Planning - Cont'd



Attaining Meaningful Use at your organization will depend on a number of factors, including the following:

- Organizational support for Meaningful Use workflows and initiatives.
- Critical examination and interpretation by your organization of regulations and recommendations.
- Involvement of compliance owners and stakeholders in EMR configuration decisions that impact Meaningful Use.

To achieve your ultimate goal of Meaningful Use, you will almost certainly need to create additional plans or processes based on circumstances unique to your organization.

This overview describes one possible approach to managing a Meaningful Use project and likely covers only a small portion of the work you will need to do.

Quality Measure Reporting



- Reporting on quality measures is different than reporting on objectives. Almost all quality measures require the submission of one or more performance percentages.
- However, unlike objectives, there are no thresholds that EPs or hospitals must exceed for Meaningful Use. Simply report the numerator, denominator, and exclusions.

The only exceptions are the two ED-based quality measures from the hospital set, where the hospital must report an average wait time from ED arrival to departure and from admission decision time to ED departure.

Financial Analysis



- Meaningful Use has the potential to significantly impact the short and long-term financial plans for your organization.

It is important that you engage your financial team early in the process to estimate the financial incentives you could receive if all hospitals and eligible professionals receive full incentive payments.

- Also, beginning in 2015, CMS has the authority to establish penalties for EPs and EHRs who do not demonstrate meaningful use of an EHR.
- As part of this analysis, your organization must determine:
 - Which professionals are “eligible professionals.”
 - Whether EPs pursue the Medicare or Medicaid incentive program.
 - When to begin reporting.

Initial Gap Analysis



To understand the full scope of your project and the major tasks that you'll need to complete, the first step is completing a high-level analysis of your current system.

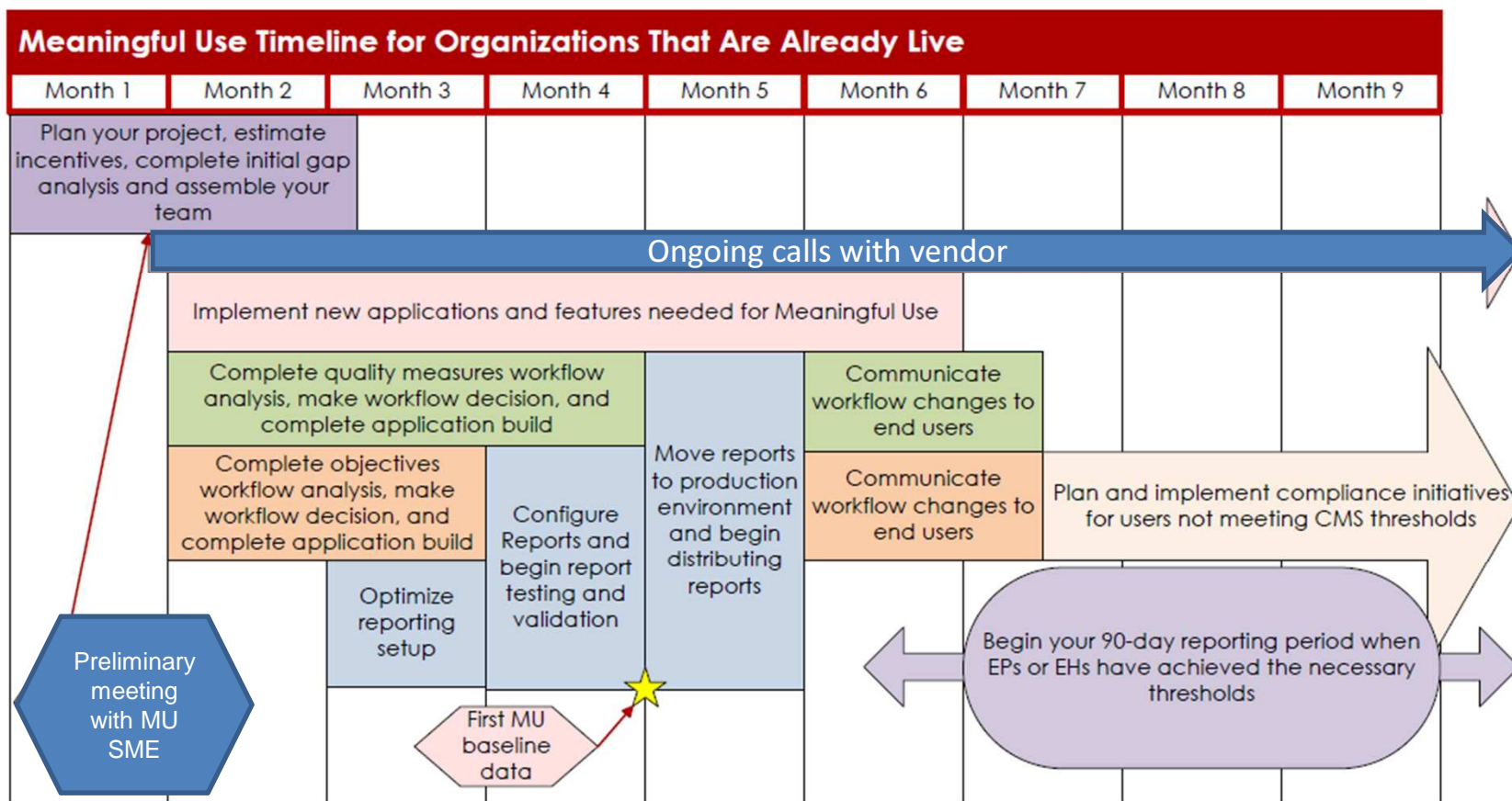
This high-level analysis ensures that your organization has the necessary applications and interfaces licensed from your EMR vendor to meet Meaningful Use.

NOTE:

ONC has stated that EPs and EHs must “possess” all the pieces of a certified EHR, but they do not need to implement the pieces needed for menu objectives on which they will report.

A conservative interpretation of this requirement is that you need to license all of the necessary applications and interfaces, but you do not need to implement and go live with them.

Project Planning and Timelines



Your Meaningful Use work should begin as soon as your project starts and you should be using appropriate Meaningful Use workflows when you go-live.

Upgrade to a Supported Version



Begin now to discuss your long-term upgrade plans with the key stakeholders at your organization.

Several regulations in the next few years, most notably Meaningful Use and ICD-10, will require you to upgrade to a version of your EMR / EHR that includes the development necessary to support the regulation by the deadline.

It will be very helpful for the long-term success of your Meaningful Use project to establish such a plan.

Consider upgrading to a new major version every 12-18 months.

Plan for Implementing New Projects and Features



- During your initial Meaningful Use Gap Analysis, you likely identified several large projects that your organization will need to complete. Those projects might include installing new applications or interfaces.
- These projects might require project managers of their own and can involve weeks or months of work.
Although such projects are critical to the overall Meaningful Use effort, they do not need to be managed under the Meaningful Use project umbrella.
- In some cases, the only Meaningful Use requirement is to be live on a given application or feature. However, as you dig into the details of Meaningful Use, you'll find that some objectives have requirements that will impact the decisions and configuration of some of these projects

Establish a Plan for Implementing Meaningful Use Updates

- To provide the best support possible, EHR vendors continually release new development related to Meaningful Use as updates to supported versions.
- Many times, these updates improve reporting performance or address issues found in the system.

Other updates are related to regulatory clarifications or are based on requests to support new workflows for meeting some objectives.

As part of managing Meaningful Use, ensure that your organization receives these updates as quickly as possible so that you can test and install them in time for reporting.

- Your organization should already have update processes in place.

Set an Initial Submission Date



- If you are working toward your initial go-live or rolling out to additional hospitals and EPs, it is a good idea to set your submission date 3-6 months post-live.
- The exact timing depends on your anticipated compliance with Meaningful Use workflows.
- Workflows and reports can be configured in the system, but you will need to monitor the reports to determine whether you need to provide additional training or implement decision support to ensure compliance and achieve the required thresholds.

Establish a Change Management and Communication Strategy

- Throughout your Meaningful Use project, you'll likely need to make small and large changes to features and workflows that can affect many users.
- These changes will come with training requirements for physicians, nurses, and other clinical users.
Additionally, registrars, front desk staff, and medical records staff might need to complete additional tasks for Meaningful Use compliance.
- One of the most significant hurdles to Meaningful Use will be getting all of your users to use consistent and accurate workflows.
- Begin planning and communicating the importance of Meaningful Use early and continue providing updates to your entire organization.

Establish a Change Management and Communication Strategy (Cont'd)

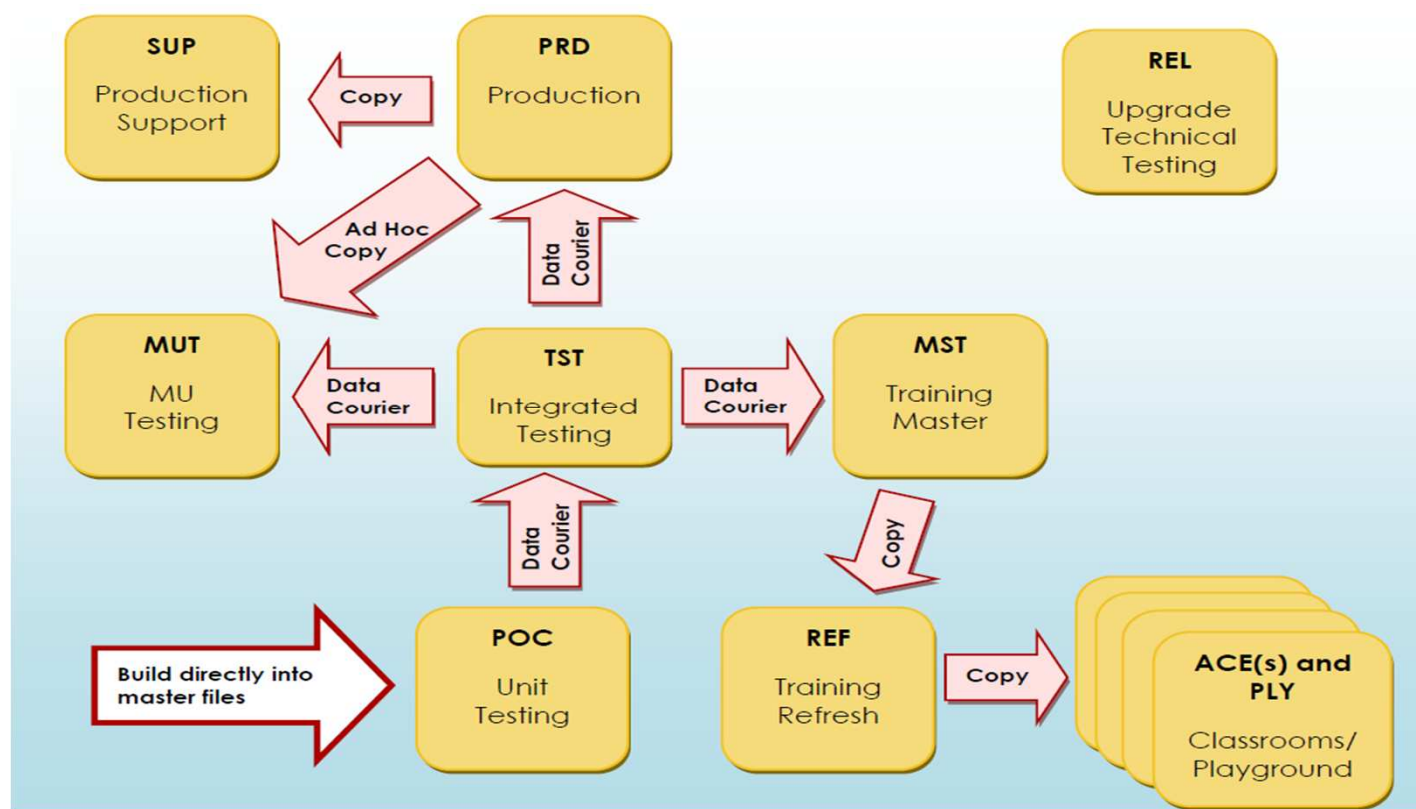
When determining your communication strategy, decide on your core message early. Early adopting organizations have taken various approaches, with the most common being one of the following:

- **Focus on the incentives.** Explain to users up front that they'll be seeing changes in the system and using modified workflows to support an organizational effort to get Meaningful Use incentive payments.
 - For example, you might highlight that the incentives could allow your organization to invest in other initiatives, such as EHR rollout or other new HIT.
- **Sell the changes.**
 - This approach largely ignores the incentive program and instead highlights why various changes are the right thing to do for patients.

There are certainly a number of other approaches your organization might employ, and you should consider your organization's culture and values when determining your core strategy for communicating Meaningful Use.

Formalize an Environment Strategy

The following diagram shows one possible environment strategy. Your organization might have other needs so work with your leadership team and your EMR Vendor to make sure you have a solid environment strategy for your organization.



Other Considerations



- **Report Distribution**

If your organization is pursuing EP incentives, you need an efficient way of distributing reports to the hundreds or thousands of EPs in your organization.

- **Ensure Your Organization Has Appropriate Hardware**

Most features required for Meaningful Use do not have special hardware requirements.

For particular objectives that might have hardware implications, reference those requirements and plan on the costs and time associated with same.

For Meaningful Use reporting, consider an appropriately sized reporting shadow server.

Assemble Your Meaningful Use Team



Meaningful Use will impact many different areas for your IT and EHR teams, along with impacting the workflows of physicians, nurses, and other clinical users at your organization.

Depending on the structures within your organization, you might need to work with other people not listed here or work with the people listed in different ways.

To accomplish your goals, you will meet regularly with your organization's Meaningful Use workgroup to ensure the group is making progress at each level.

Depending on your timelines, you should consider meeting weekly or twice monthly. These meetings should focus on progress reports, problem areas, and other important updates.

Staffing Considerations



Project Manager (Significant) :

- Track updates, progress, follow-ups, and meetings between Meaningful Use team members, reporting teams, clinical leadership, and compliance representatives.

Track that the team is meeting its overall project milestones. Coordinate and track Meaningful Use achievement and attestation.

- For live organizations, Meaningful Use should be this role's primary or only responsibility.

For installing organizations, this role is often assumed by a project manager who has other similar implementation and project coordination responsibilities.

Staffing Considerations



Meaningful Use Leadership Team (Variable):

- Set the direction, scope, and timelines for the Meaningful Use project overall.

Oversee the project at a high level, and provide necessary guidance as the project progresses.

Include your EHR project leadership and relevant clinical leadership.

- This group should meet frequently as your Meaningful Use project kicks off to set the direction, scope, and timelines.

This time commitment should decrease after the project kicks off. However, this group should continue to meet at least monthly for the duration of the project.

Additional Staffing Considerations



Application Analysts : Own specific objectives and quality measures. Complete the analysis, build, and testing related to meeting the requirements of the objective.

Reporting Team: Own the configuration of Meaningful Use reports and run them as needed.

Legal and Compliance: Review the Meaningful Use regulations and work with compliance experts to ensure compliance based on the regulations. Work with project leadership and financial experts to make sure incentive payments are handled properly.

Training: Make sure to update any new user training to highlight Meaningful Use components of workflows. Create additional training materials and strategies for training experienced users on any Meaningful Use workflow changes.

Privacy and Security: Provide guidance regarding the implications of implementing the Meaningful Use criteria while meeting privacy and security requirements.

Implementing Objectives and Quality Measures

Meaningful Use is a program that attempts to specifically measure how “meaningfully” an EP or EH is using an EHR.

Demonstrating this “Meaningful Use” requires two parts:

- 1) using the EHR to comply with the defined objectives
- 2) reporting on the data captured in the EHR to show “Meaningful Use.”

To show “Meaningful Use,” EPs and hospitals must attest that they met the requirements for a subset of these objectives and quality measures.

For all quality measures and for many objectives, they also need to submit reporting data gathered from their certified EHR.

Organizations can submit this data through an attestation website provided by CMS.

Objectives and Quality Measures



Consider the following points to maximize efficiency:

- Many objectives apply to both EPs and EHs, and the requirements do not differ significantly.

You might be able to save time by having a single person own the objective across your organization or by making sure that your EP and hospital analysts work together and share knowledge.

- Many quality measures involve similar workflows. In many cases, quality measures in the same category differ only in the diagnoses and medications that are being evaluated, and the underlying workflows are very similar.

You might be able to save time by assigning analysts to a collection of measures in a category.

- Many objectives cover core features and workflows, and your current workflows might already be Meaningful Use-compliant.

You might be able to save time by assigning all of these objectives to a single person to quickly verify whether your existing workflows are sufficient.

Objectives and Quality Measures



Limited Workflow Testing

If your organization has specific concerns about a few workflows but is confident that the majority of workflows are reporting accurately, you might choose to focus **only** on the concerning workflows.

If you find that you are struggling to validate a subset of measure results using spot checking or have other reasons to look more deeply into a specific objective, discuss processes with your vendor to run through the suggested workflows for those particular objectives or measures.

To complete this strategy, follow the steps for workflow testing but for only the specific objectives or measures that you've identified.

Looking Ahead



At this point, you should have a good sense of the project ahead of you.

Throughout your project, work closely with your vendor representatives and stay in touch with the changes and evolutions of Meaningful Use regulations.

Ultimately, Meaningful Use is a program focusing on the *use* of the system.

Your vendor will continue to provide the best software and workflows they can, but the real work of getting incentives will fall to your physicians, nurses, support staff, and other users of the vendor software.

Thank you!

Thank you for joining Acro Service Corporation's HIT Practice Meaningful Use Webinar Part III, we appreciate your time.

If you have additional questions, please contact Melonie Behan; by phone: 734-632-4253 or by email: mbehan@acrocorp.com.

All questions will be responded to within 3 business days.

Please register for our next Webinar by emailing Dana Kohler; dkohler@acrocorp.com

– *Meaningful Use Reporting Strategies* –
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