HealthCare
Kentucky Regional Extension Center

KY REC Tip for the Kentucky Medicaid EHR Incentive Program (Promoting Interoperability)

Public Health and Clinical Data Registry Reporting

What does Stage 3 require for Public Health and Clinical Data Registry Reporting?

The eligible professional (EP) is in active engagement with a public health agency (PHA) or clinical data registry (CDR) to submit electronic public health data in a meaningful way using certified electronic health record technology (CEHRT), except where prohibited, and in accordance with applicable law and practice.

An EP must satisfy two measures for this objective. If the EP cannot satisfy at least two measures, they may take exclusions from all measures they cannot meet.

- Measure 1: Immunization Registry Reporting: The EP is in active engagement with a PHA to submit immunization data and receive immunization forecasts and histories from the public health immunization registry/immunization information system (IIS).
- Measure 2: Syndromic Surveillance Reporting: The EP is in active engagement with a PHA to submit syndromic surveillance data.
- Measure 3: Electronic Case Reporting: The EP is in active engagement with a PHA to submit case reporting of reportable conditions.
- Measure 4: Public Health Registry Reporting: The EP is in active engagement with a PHA to submit data to public health registries.
- Measure 5: CDR Reporting: The EP is in active engagement to submit data to a CDR.

Exclusions:

There are multiple exclusions for the Public Health Objective listed on the Medicaid Eligible Professional specification sheet provided by CMS. Please see the link below.

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What is “Active Engagement”?

Active engagement means that a provider is in the process of moving toward sending data generated through clinical processes involving patient care to a Public Health Agency or Clinical Data Registry. Test data may also be submitted for the purposes of enrolling in and testing electronic data transfers.

Active engagement can be demonstrated in the following ways:

Option 1 - Completed Registration to Submit Data: The EP registered to submit data with the PHA or, where applicable, the CDR to which the information is being submitted; registration was completed within 60 days after the start of the EHR reporting period; and the EP is awaiting an invitation from the PHA or CDR to begin testing and validation. This option allows EPs to meet the measure when the PHA or the CDR has limited resources to initiate the testing and validation process. EPs that have registered in previous years do not need to submit an additional registration to meet this requirement for each EHR reporting period.

Required documents: Participation agreement and relevant addendums

Option 2 - Testing and Validation: The EP is in the process of testing and validation of the electronic submission of data. EPs must respond to requests from the PHA or, where applicable, the CDR within 30 days; failure to respond twice within an EHR reporting period would result in that EP not meeting the measure.

Required documents: Participation agreement, relevant addendums, and Meaningful Use confirmation form from KHIE

Option 3 - Production: The EP has completed testing and validation of the electronic submission and is electronically submitting production data to the PHA or CDR.

Required documents: Participation agreement, relevant addendums, and Go-live Approval form from KHIE

Kentucky Health Information Exchange:

KHIE is the public health authority for meaningful use reporting in Kentucky. KHIE has the following registries available to support several Public Health Reporting measures.

- Kentucky Immunization Registry
- CDC BioSense Syndromic Surveillance
- Kentucky Cancer Registry
- KHIE Advance Directive Registry
- Kentucky National Electronic Disease Surveillance System
- Kentucky Health Information Exchange

Kentucky Public Health Guidance:

https://khie.ky.gov/Resources/Pages/default.aspx

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Best Practices:

- Gather documents prior to the attestation. Signed agreements will need to be saved as a PDF for upload during attestation.
- For measures reported to the Kentucky Health Information Exchange (KHIE), you must have a signed Participation Agreement and the appropriate signed addendums on file with KHIE.
- Participation agreements and addendums must be signed within 60 days of the beginning of the EHR reporting period.
- For specialized registries, you must have documentation proving that you have registered and will be participating with the registry.
- If a provider does not give immunizations, they will need to sign up for a different public health or clinical registry option.
- For Measure 1, Immunization Registry, you must have the signed bidirectional immunization registry addendum signed and report on the status of bidirectional immunization rather than the old immunization registry that is not bidirectional.

CMS EP Specification Sheet – Public Health and Clinical Data Registry Reporting:

https://www.cms.gov/files/document/medicaid-ep-2020-public-health-reporting-objective-8.pdf