CMS e-Notification Conditions of Participation Rule
HealthInfoNet's Guidance Checklist for Hospitals

As of May 1, 2021, the Centers for Medicare & Medicaid Services ("CMS") requires all hospitals, per its Conditions of Participation ("CoP"), to ensure a reasonable effort is made to send electronic notifications ("e-notifications") to a patient's treating provider(s) at either the provider's request or the patient's direction.

HealthInfoNet can assist Maine's hospitals meet CMS's CoP e-notification rule with its HIE Intelligent e-Notification service. For more information, see HealthInfoNet's one-pager overview document.

The checklist below can be used by hospitals to guide their fulfillment of CMS's e-notification CoP rule.

Baseline Assumptions

☐ The hospital meets CoP criteria by having an electronic health record ("EHR") or electronic administrative system ("system") that has the ability to generate HL7 2.5.1 messages.

☐ The hospital's system is fully operational and in accordance with all state and federal statutes and regulations regarding the exchange of patient health information outside of this rule.

Rule Compliance

☐ The hospital's system is electronically capturing the following data elements to support **non-HealthInfoNet** notification workflows (e.g., direct messaging):

    ☐ A patient's primary care provider ("PCP") and PCP group

    ☐ The post-acute care providers and suppliers with whom a patient has an established care relationship prior to admission/registration to an inpatient/emergency department ("ED") setting

    ☐ The post-acute care providers and suppliers to whom a patient is being transferred or referred upon discharge from an inpatient/ED setting

    ☐ A patient's other identified practitioner(s)/group

☐ Notifications are sent from/on behalf of (e.g., via HealthInfoNet) the hospital in near-real time for the following events:

    ☐ When a patient is registered to an ED setting (including observation stays)

    ☐ When a patient is admitted to an inpatient setting (including observation stays)

    ☐ When a patient is transferred from an outpatient setting to an inpatient setting (including observations stays)

    ☐ When a patient is discharged from an ED setting (including observation stays)

    ☐ When a patient is discharged from an inpatient setting (including observation stays)

☐ Notification content (via HIE ADT) contains, at a minimum: the patient's name (or other identifiers), their treating provider's name, and the sending organization's name.

- ☐ The hospital has documented, implemented, and trained staff on the policies and procedures to comply with the CoP, including:

    - ☐ All solutions to support the CoP have been documented

    - ☐ Documentation includes how the hospital has gone beyond the rule's minimum requirements by sharing clinical data in real time to the longitudinal Health Information Exchange ("HIE") record to support care coordination activities

    - ☐ Reviewed and referenced HealthInfoNet's CoP "Letter of Attestation"

- ☐ Audit trails of when and where notifications are sent are in place. (For hospitals leveraging HealthInfoNet's notification service, the necessary audit trails are provided.)

<u>Workflow Considerations</u>

To support meaningful workflows with the hospital's notification recipients, consider the following:

- ☐ Ensure medical records departments understand the role of HealthInfoNet in delivering notifications to the rule's recipients (e.g., primary care provider/practices/groups, post-acute care providers and suppliers, etc.).

- ☐ Redirect provider-requested notifications to HealthInfoNet's notification services to reduce duplicative manual/direct-messaging workflows for both the hospital and the recipient, when appropriate.

- ☐ Reach out to HealthInfoNet for educational training and/or technical support on its notification services, including the service's auditing capabilities, to support meaningful workflows.

    - ☐ For educational training, contact HealthInfoNet's Clinical Education team via email at clienteducation@hinfonet.org

    - ☐ For technical support, contact HealthInfoNet's Customer Care team via email at customercare@hinfonet.org