



HealthInfoNet's HIE Solutions to the CMS e-Notification CoP Rule

How HealthInfoNet's HIE Services Can Assist Maine's
Hospitals Meet CMS's Electronic Notification CoP Rule.

*Dedicated to helping our communities create lasting
system-wide improvements in the value of patient care.*



Objectives

Key Focus Areas to Guide the Conversation.

- Overview of CMS's Condition of Participation (CoP) e-notification rule
- Overview of HealthInfoNet's HIE services to help meet CMS's CoP rule
 - Preview of materials offered by HealthInfoNet to HIE participants
- Recap of common questions and answers



What is the CMS e-Notification CoP Rule?

Condition of Participation (CoP) Data-Sharing Requirements.



CMS Interoperability & Patient Access Final Rule (CMS-9115-F)

CMS requires all hospitals, as of May 1, 2021, to automate notifications of certain events of care to certain recipients with treating relationships

SOURCE: <https://www.federalregister.gov/d/2020-05050>

HealthInfoNet can confirm the occurrence of the required events of care and automate the delivery of notifications solicited via subscriptions.




The Joint Commission Prepublication

New Standards Related to the CMS Final Rule.



Prepublication Requirements

• Issued March 19, 2021 •



New Standard Related to CMS Final Rule

The Joint Commission has approved the following revisions for prepublication. While revised requirements are included in the semiannual updates to the print manuals (as well as in the online *E-dition*®), accredited organizations and subscribers can also view them in the monthly periodical *The Joint Commission Perspectives*®. To begin your subscription, call 800-746-6578 or visit <http://www.jcrinc.com>.

Please note: Where applicable, this report shows current standards and EPs first, with deleted language struck through. Then, the revised requirement follows in bold text, with new language underlined.

APPLICABLE TO THE HOSPITAL ACCREDITATION PROGRAM
Effective May 1, 2021

Information Management (IM) Chapter

IM.02.02.07

For hospitals that use Joint Commission accreditation for deemed status purposes: The hospital meets requirements for the electronic exchange of patient health information.
 Note: This standard only applies to hospitals that utilize an electronic medical records system or other electronic administrative system that conforms with the content exchange standard at 45 CFR 170.205(d)(2).

Element(s) of Performance for IM.02.02.07		
1. For hospitals that use Joint Commission accreditation for deemed status purposes: The hospital demonstrates that its electronic medical records system (or other electronic administrative system) has a fully operational notification capacity and is used in accordance with applicable state and federal laws and regulations for the exchange of patient health information.	<input type="checkbox"/>	<input type="checkbox"/>
2. For hospitals that use Joint Commission accreditation for deemed status purposes: The hospital demonstrates that its electronic medical records system (or other electronic administrative system) sends notifications that include at least the patient's name, treating practitioner's name, and sending institution's name.	<input type="checkbox"/>	<input type="checkbox"/>
3. For hospitals that use Joint Commission accreditation for deemed status purposes: In accordance with the patient's expressed privacy preferences and applicable laws and regulations, the hospital's electronic medical records system (or other electronic administrative system) sends notifications directly, or through an intermediary that facilitates exchange of health information, at the time of the patient's emergency department registration or inpatient admission.	<input type="checkbox"/>	<input type="checkbox"/>

Key: **D** indicates that documentation is required; **R** indicates an identified risk area;



How Should Hospitals Prepare?

Guidance For Hospitals to Ensure Rule Compliance.

- Confirm baseline assumptions
- Confirm CoP rule compliance
- Confirm workflow considerations

For detailed information, see HealthInfoNet's Guidance Checklist that can be used by hospitals to guide their fulfillment of CMS's e-notification CoP rule.



Who Can Request e-Notifications?

Data-Request Capabilities Required to Ensure Rule Compliance.



Provider Requested

Primary care and post-acute care providers who request e-notifications on behalf of their patients

Covers required notifications to:

Primary Care Providers & Groups

Post-Acute Care Providers & Supplies



Patient Directed

Patients who request e-notifications be sent to their PCP or another provider at the point of care

Covers required notifications to:

Primary Care Providers

Other Identified Providers





What Is Included in e-Notifications?

Types & Recipients of e-Notifications Required to Ensure Rule Compliance.

These Types of e-Notifications

ED Registration & Discharge
(+ observations)

Inpatient Admission & Discharge
(+ observations)

Outpatient to Inpatient Transfer

Must Include These Data Elements

- *Patient Name*
- *Treating Provider Name*
- *Sending Organization Name*

Then Allow For Detailed Auditing

Other Providers (per Patient Requests)

Post-Acute Care Providers & Suppliers

Primary Care Providers & Groups

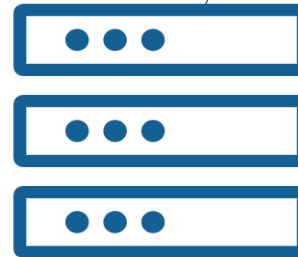
And Be Sent To These Types of Providers



How Can HealthInfoNet Assist?

HealthInfoNet's HIE Solutions to Ensure Rule Compliance.

- Connected to more than **830 healthcare locations throughout the state**, including all health systems, acute-care hospitals, and critical-access hospitals; over 85% of ambulatory and FQHC facilities; the majority of post-acute care facilities
- Establish **comprehensive electronic medical records** for patients across connected locations
- Provide **Intelligent e-Notification service** to participant end-users to stay up-to-date on patients' event-based care activities across the state



Receipt of Real-Time ADT Feeds from Hospitals



Access to Longitudinal Electronic Medical Records



Delivery of Real-Time Event-Based Intelligent e-Notification Service



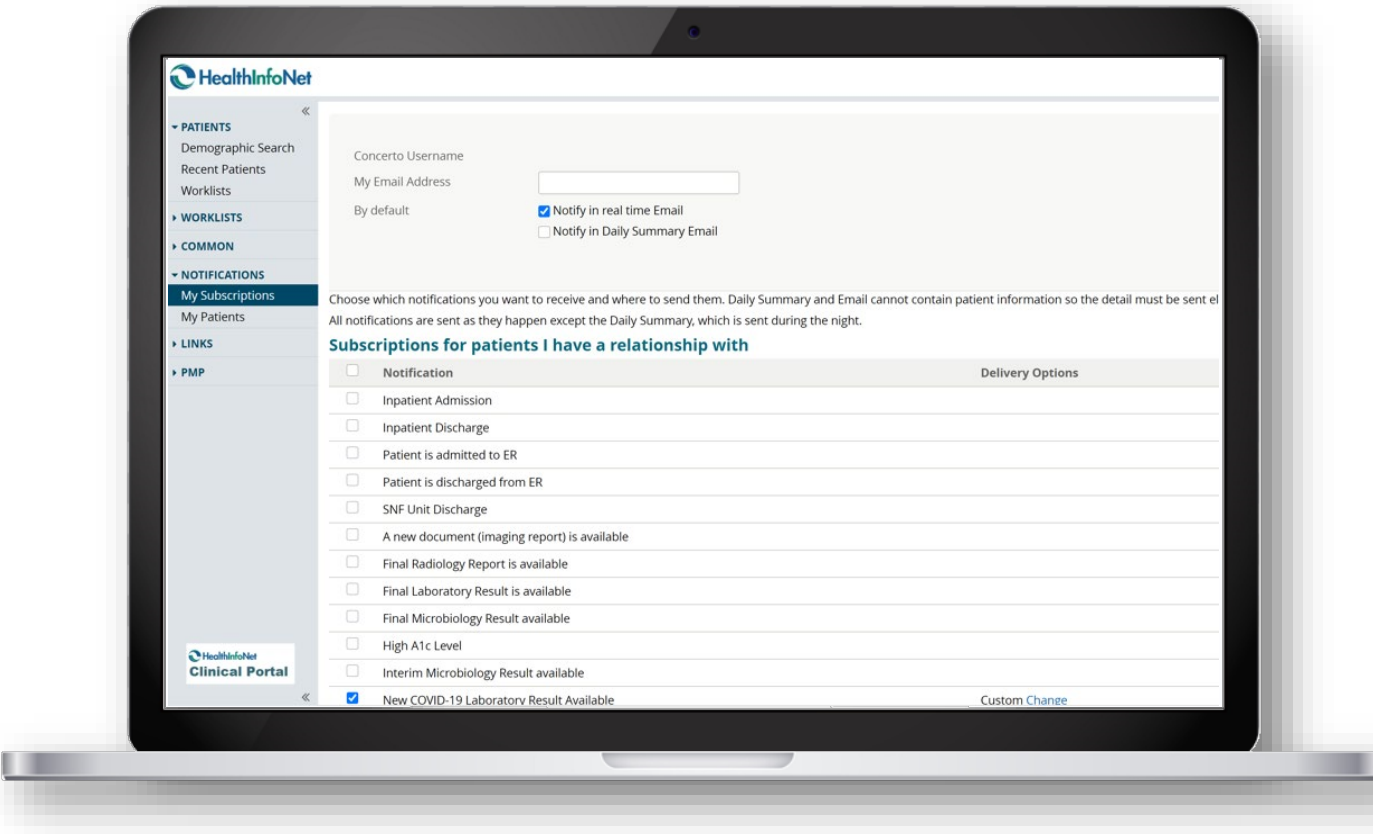
Capability to Audit Notifications Sent





HealthInfoNet's Intelligent e-Notification Service

Real-Time & Daily Summary Event-Based Alerting.



INTELLIGENT e-NOTIFICATION SERVICE – Real-time alerting of time-sensitive events that make it possible for clinicians to establish the right care plan at the right time.

Key features include:

My Patients

Manual or automated creation of provider-specific patient panels for monitoring key medical events over time

My Subscriptions

Key medical events, such as inpatient/ED admissions/discharges, laboratory results, etc. that providers can receive notifications on for their defined patient panels in real-time or in a daily-summary report





HealthInfoNet's Intelligent e-Notification Workflow

Using Established Clinical Workflows to Ensure Rule Compliance.

HealthInfoNet receives
ADT information on
patient's event of care

HealthInfoNet automates delivery
of subscribed notifications to
patient's providers and care team



Patient is admitted
to or discharged from
hospital, or transferred from
hospital to patient care team
or post-acute care service

Patient's providers and care team
subscribe to HealthInfoNet's event-
based Intelligent e-Notification
service to receive alerts on
patient's care activities

HealthInfoNet provides
patient's providers and care
teams with the ability to
audit sent notifications

HealthInfoNet's CMS CoP Materials

Materials Available Online for More Information.



HealthInfoNet COMPANY SOLUTIONS RESOURCES FOR PATIENTS CONTACT

HealthInfoNet's HIE Solutions to the CMS e-Notification CoP Rule

April 12, 2021

As of May 1, 2021, 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.

When patients are admitted/registered to, discharged from, or transferred from inpatient or emergency department settings (including observation stays), an alert is expected to be sent from the hospital to primary care providers and groups, post-acute care providers and suppliers, and any other providers requested by the patient.

Specific patient data elements must be contained within the e-notifications, paired with detailed auditing functionality to enable organizations to view which of their staff are notification recipients and when notifications were sent (and if their delivery were successful).

To assist Maine's healthcare organizations meet CMS's CoP rule, HealthInfoNet offers its Intelligent e-Notifications as a standard service to participants of the Health Information Exchange ("HIE"). The HIE Intelligent e-Notification service provides real-time alerting of time-sensitive events that make it possible for clinicians to establish the right care plan at the right time.

To learn more about the CMS e-notification CoP rule, and how HealthInfoNet can assist HIE participants in meeting its requirements, please refer to the following materials:

1. HIE Solutions Overview (Slide Deck)
2. HIE Solutions Overview (One-Pager)
3. Guidance Checklist for Hospitals
4. Technical Specifications for Hospitals
5. Template Letter of Attestation for Hospitals
6. HIE Participant List (Updated 2021-04-01)
7. HIE Participant Interest One-Pager

For any additional questions, please contact HealthInfoNet's Customer Support team at customercare@hinfonet.org.

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We're hiring! Interested in helping to pioneer health information technology solutions for

Find our CMS CoP e-notification materials online at the following URL: <https://hinfonet.org/2021/04/12/healthinfonets-hie-solutions-to-the-cms-e-notification-cop-rule>





Questions & Answers

Common Inquiries Regarding CMS's CoP Rule.

1. How much of the PCP/PAC community is an HIE participant?

» *Refer to HealthInfoNet's "HIE Participant List" for more information*

2. Do all HIE participants get access to notifications from hospitals?

» *HealthInfoNet's e-notification service is a standard HIE offering and trained on upon connection*

3. How can non-HIE participants obtain notifications?

» *If an organization is not an HIE participant, they are likely planning to use EHR Direct Messaging workflows*

4. What if a recipient chooses not to receive notifications?

» *CMS's rule does not address or require the recipient to access or use the information contained in the notifications, just that the hospital must make the notification information available in "real-time" or just prior to discharge*





Questions & Answers (cont.)

Common Inquiries Regarding CMS's CoP Rule.

5. How should PCP/PAC HIE participants subscribe to notifications?

» *HIE participants can subscribe to daily and/or real-time notifications through the HIE Clinical Portal or submit patient panel files for automated attribution subscription*

6. Will HealthInfoNet provide a letter explaining how HIE-participating hospitals comply with the CMS rule?

» *HealthInfoNet is providing a letter of attestation that each hospital can use to confirm that the minimum data requirements are being met within their existing ADT feeds; the letter will also include a description of the HIE notification and audit services provided to participants*





60 Pineland Drive
Portland Hall, Suite 230
New Gloucester, ME 04260



www.hinfonet.org



customer care@hinfonet.org



207-541-9250



<https://twitter.com/hinfonet>



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