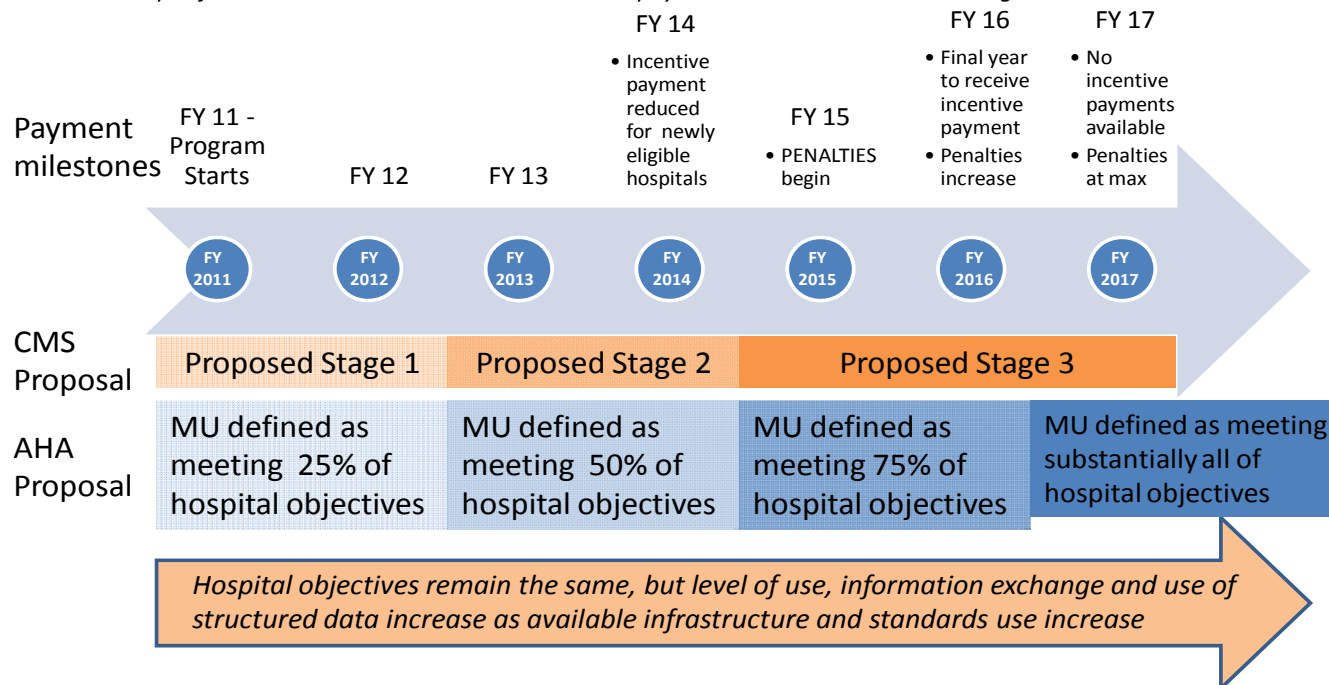


Attachment 1: Alternative Approach and Recommended Hospital Meaningful Use Objectives for 2011-2017

This attachment includes a graphic depiction of the alternative approach recommended in my comment letter and a complete list of the recommended hospital meaningful use objectives for 2011 to 2017, including recommended increases in the level of use, use of structured data, and health information exchange over time.

Alternative Approach to Defining Meaningful Use

Recommendation: CMS should identify a single, expanded set of meaningful use objectives to be achieved between 2011 and 2017. Hospitals would be considered meaningful EHR users and qualify for the full EHR incentive payment if they meet a specified share of the hospital objectives in a given fiscal year. The specified share would increase over time. The payment schedule would not change.



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2011/2012 Meet 25% (8) of: < 100 beds Meet 15% (5) of:	2013/2014 Meet 50% (17) of: < 100 beds Meet 30% (10) of:	2015/2016 Meet 75% (26) of: < 100 beds Meet 60% (20) of:	2017 Meet substantially all of:
<ol style="list-style-type: none"> 1. CPOE (10% or more) 2. Drug-drug/drug-allergy checks 3. Drug-formulary checks 4. Structured problem list 5. Structured medication list 6. Structured medication allergy list 7. Record demographics 8. Record vital signs 9. Record smoking status 10. Incorporate structured clinical-lab data (50%) 11. Patient lists by condition 12. 5 clinical decision support rules 13. Electronic copy of health information to patients on request 14. Electronic copy of discharge instructions and procedures at discharge, upon request 15. Exchange key clinical information 16. Summary care record 17. Immunization registries (capability) 18. Reportable lab results (capability) 	<ol style="list-style-type: none"> 1. CPOE (10% or more) 2. Drug-drug/drug-allergy checks 3. Drug-formulary checks 4. Structured problem list 5. Structured medication list 6. Structured medication allergy list 7. Record demographics 8. Record vital signs 9. Record smoking status 10. Incorporate structured clinical-lab data (50%) 11. Patient lists by condition 12. 5 clinical decision support rules 13. Electronic copy of health information to patients on request 14. Electronic copy of discharge instructions and procedures at discharge, upon request 15. Exchange key clinical information 16. Summary care record 17. Immunization registries (capability) 18. Reportable lab results (capability) 	<ol style="list-style-type: none"> 1. CPOE (50% or more) 2. Drug-drug/drug-allergy checks 3. Drug-formulary checks 4. Structured problem list 5. Structured medication list 6. Structured medication allergy list 7. Record demographics 8. Record vital signs 9. Record smoking status 10. Incorporate structured clinical-lab data (75%) 11. Patient lists by condition 12. 25 clinical decision support rules 13. Electronic copy of health information to patients on request 14. Electronic copy of discharge instructions and procedures at discharge, upon request 15. Exchange key clinical information (CCD) 16. Summary care record 17. Immunization registries (submit data if possible) 18. Reportable lab results (submit data if possible) 	<ol style="list-style-type: none"> 1. CPOE (substantially all) 2. Drug-drug/drug-allergy checks 3. Drug-formulary checks 4. Structured problem list 5. Structured medication list 6. Structured medication allergy list 7. Record demographics 8. Record vital signs 9. Record smoking status 10. Incorporate structured clinical-lab data (subst. all) 11. Patient lists by condition 12. 25 clinical decision support rules 13. Electronic copy of health information to patients on request 14. Electronic copy of discharge instructions and procedures at discharge, upon request 15. Exchange key clinical information (CCD) 16. Summary care record 17. Immunization registries (submit data if possible) 18. Reportable lab results (submit data if possible)

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19. Syndromic surveillance data (capability) 20. Conduct or review a security risk analysis as required by HIPAA and implement security updates as necessary 21. <i>Use of evidence-based order sets (1 department)</i> 22. <i>Electronic medication administration record (eMAR) (1 department)</i> 23. <i>Bedside medication administration support (barcode/RFID) (1 department)</i> 24. <i>Record nursing assessment in EHR (1 department)</i> 25. <i>Record nursing plan of care in EHR (1 department)</i> 26. <i>Record physician assessment in EHR (1 department)</i> 27. <i>Record physician notes in EHR (1 department)</i> 28. <i>Multimedia/Imaging integration (e.g., X-Ray viewing)</i>	19. Syndromic surveillance data (capability) 20. Conduct or review a security risk analysis as required by HIPAA and implement security updates as necessary 21. <i>Use of evidence-based order sets (3 departments)</i> 22. <i>Electronic medication administration record (eMAR) (3 departments)</i> 23. <i>Bedside medication administration support (barcode/RFID) (3 departments)</i> 24. <i>Record nursing assessment in EHR (3 departments)</i> 25. <i>Record nursing plan of care in EHR (3 departments)</i> 26. <i>Record physician assessment in EHR (3 departments)</i> 27. <i>Record physician notes in EHR (3 departments)</i> 28. <i>Multimedia/imaging integration (e.g., X-Ray viewing)</i>	19. Syndromic surveillance data (submit data if possible) 20. Conduct or review a security risk analysis as required by HIPAA and implement security updates as necessary 21. <i>Use of evidence-based order sets (5 departments)</i> 22. <i>Electronic medication administration record (eMAR) (5 departments)</i> 23. <i>Bedside medication administration support (barcode/RFID) (5 departments)</i> 24. <i>Record nursing assessment in EHR (5 departments)</i> 25. <i>Record nursing plan of care in EHR (5 departments)</i> 26. <i>Record physician assessment in EHR (5 departments)</i> 27. <i>Record physician notes in EHR (5 departments)</i> 28. <i>Multimedia/imaging integration (e.g., X-Ray viewing)</i>	19. Syndromic surveillance data (submit data if possible) 20. Conduct or review a security risk analysis as required by HIPAA and implement security updates as necessary 21. <i>Use of evidence-based order sets (substantially all departments)</i> 22. <i>Electronic medication administration record (eMAR) (substantially all departments)</i> 23. <i>Bedside medication administration support (barcode/RFID) (substantially all departments)</i> 24. <i>Record nursing assessment in EHR (substantially all departments)</i> 25. <i>Record nursing plan of care in EHR (substantially all departments)</i> 26. <i>Record physician assessment in EHR (substantially all departments)</i> 27. <i>Record physician notes in EHR (substantially all departments)</i> 28. <i>Multimedia/imaging integration (e.g., X-Ray viewing)</i>

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29. <i>Generate permissible discharge prescriptions electronically</i> 30. <i>Contribute data to a PHR</i> 31. <i>Record patient preferences (language, etc.)</i> 32. <i>Provide electronic access to patient-specific educational resources</i> 33. <i>Reporting of RHQDAPU quality measures through existing process</i>	29. <i>Generate permissible discharge prescriptions electronically</i> 30. <i>Contribute data to a PHR</i> 31. <i>Record patient preferences (language, etc.)</i> 32. <i>Provide electronic access to patient-specific educational resources</i> 33. <i>Medication reconciliation across settings of care (pilot)</i> 34. <i>Reporting of some RHQDAPU quality measures through EHR</i>	29. <i>Generate and transmit permissible discharge prescriptions electronically</i> 30. <i>Contribute data to a PHR</i> 31. <i>Record patient preferences (language, etc.)</i> 32. <i>Provide electronic access to patient-specific educational resources</i> 33. <i>Medication reconciliation across settings of care (if possible)</i> 34. <i>Reporting of some RHQDAPU quality measures through EHR</i>	29. <i>Generate and transmit permissible discharge prescriptions electronically</i> 30. <i>Contribute data to a PHR</i> 31. <i>Record patient preferences (language, etc.)</i> 32. <i>Provide electronic access to patient-specific educational resources</i> 33. <i>Medication reconciliation across settings of care</i> 34. <i>Reporting of all appropriate RHQDAPU measures through EHR</i>

Notes:

1. *ITALICIZED objectives from the HIT PC recommendations for 2013 and 2015*
2. *List Excludes proposed objectives on electronic insurance verification and electronic billing in all years, and medication reconciliation in 2011/2012 only.*