

Regulatory Considerations For 2020

NCPDP SCRIPT Version 2017071

Promoting Interoperability (PI3) & MACRA/MIPS

Imaging Appropriate Use Criteria (AUC)

Minimum Data Set (MDS)

Updated - July 31, 2020 - Several regulatory programs require code as well as the implementation of new functionality this year. Below are the key milestones to align your organization with MEDITECH's strategy for regulatory code deployment and support in 2020. This information has been updated to reflect changes in regulatory compliance deadlines. It is based on what we know today and is subject to change.

	2020							PI & MDS	AUC		
	March	April	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
PI3/MIPS	Implement new workflows and accept code for HIE2 reporting										
NCPDP SCRIPT v2017071	Update to Required PPack and schedule SCRIPT v2017071 update										
AUC Clinical Phase	Test/Implement AUC Clinical functionality										
AUC Claims Phase					Update to Required PPack and implement new functionality						
MDS: US							Mass Delivery				

NCPDP SCRIPT v2017071

An update to NCPDP SCRIPT version 2017071 is required in 2020. Per CMS, NCPDP SCRIPT v2017071 went into effect January 1, 2020. Surescripts is continuing to support SCRIPT v10.6 with a sunset date of December 1, 2020. Failure to update to v2017071 by that date will result in a total loss of e-Prescribing functionality as all messages will be rejected by Surescripts.

Update (July 2020): Surescripts announced that they have established a new sunset date of September 2021 for SCRIPT Version 10.6, and will extend their translation services accordingly. We encourage your facility to continue to work towards migrating to the CMS compliant SCRIPT version 2017071 as soon as possible.

To Prepare For This Requirement

You must be at the required release below and coordinate with MEDITECH and DrFirst to cut over to the new version.

- **Compliance Deadline:** **September 2021**
- **Code Requirements:** Expanse 2.1 pp8, 6.15 pp49, 6.08 pp38, C/S 5.67 pp36, MG 5.67 pp33
- **Code Availability:** Available

Next Steps For Your Organization

- If you are not at the required release above, work with your Account Manager/HCIS Coordinator to schedule an update. Your dates will be scheduled based on the mix of regulatory programs your organization participates in. ERX customers must be LIVE with the required release 2 months prior

to the new sunset date established by Surescripts, as additional coordination between your facility, MEDITECH, and DrFirst is required to migrate providers to v2017071.

- If you are at or above one of the releases listed above, please review your ERX task titled “NCPDP Script v2017071 (NewScript)” to coordinate your update to NCPDP SCRIPT v2017071.

Questions?

Contact your ERX specialist.

Promoting Interoperability/MIPS

Health Information Exchange Measure 2: Receiving & Incorporating Health Data (HIE2) was optional in 2019, but is required for the Promoting Interoperability program for Eligible Hospitals (EHs), Critical Access Hospitals (CAHs), and MIPS Eligible Clinicians (ECs) in 2020. To meet the measure, for at least one electronic summary of care record received, the EH, CAH, and MIPS EC conducts clinical information reconciliation for medications, medication allergies, and current problem list data. In the performance-based scoring model, the maximum score for this measure is 20 points.

To Prepare For This Requirement

You will need to ensure the new workflows and staff education of reviewing external medications, allergies, and problems are implemented. Additionally, code must also be accepted to capture this data on MEDITECH's certified SQL reports.

- **Reporting/Attestation Requirements:** Any continuous 90 days in CY 2020
- **Code Requirements:** HIE2 code needed to capture data on MEDITECH's certified SQL reports. Otherwise, the Stage 3-Certified releases have not changed from 2019: Expanse 2.1, 6.15 pp42, 6.08 pp31, C/S 5.67 pp31, and MG 5.67 pp28.
- **Code Availability:** HIE2 code was made available in September 2019. To determine the status of this code for your organization, look for an EMRT/EPS Task titled “MD: PI3-HIE Measure 2 Changes”. MPM customers will have a corresponding APR task. We will offer mass delivery for anyone who has not yet received this code.

Next Steps For Your Organization

- If you have not received the HIE2 code, please provide change control in EMRT/EPS Task “MD: PI3-HIE Measure 2 Changes” (MPM customers will have a corresponding APR task) so MEDITECH can begin delivery. Code must be LIVE prior to your 90-day reporting period.
- Staff education on the workflows for consuming CCDs and reconciling external data should begin immediately, if it has not begun already. This functionality is not dependent on the code referenced above, and can be worked on even if that code is not yet in place.
- An M Module Task titled “PI/MIPS HIE Measure 2: Receiving and Incorporating Health Information” will be opened to provide links to educational resources and reports, which helps you gauge your current performance. This task will be used to support you as you roll out the workflows to achieve your desired level of adoption. After July 1, MEDITECH support related to HIE2 will be limited, as we will need to prioritize support for other regulatory programs that commence later in the year.
- Careful consideration of the information contained in this document will be needed when selecting your 90-day reporting period for PI3/MIPS.

MEDITECH Professional Services

Promoting Interoperability requirements encourage organizations to actively participate in health information exchange. If you're uncertain where to begin, or if you need guidance on challenging measures such as "support electronic referral loops by receiving and incorporating" MEDITECH Professional Services can help. For more information contact Joe Wall, manager, Interoperability Professional Services, at 781-774-2128 or jwall@meditech.com.

Questions?

Contact MEDITECH's [Regulatory Mailbox](#).

Imaging Appropriate Use Criteria (AUC)

Advanced diagnostic imaging services furnished under Medicare Part B require evidence of consultation of AUC at the time of ordering. MEDITECH has collaborated with the National Decision Support Company (NDSC) to offer a streamlined method to license and activate the required features for compliance.

To Prepare For This Requirement

You will need to be at the required release listed below and complete required implementation and testing with MEDITECH and NDSC. Implementation of this functionality will be rolled out in two phases. The clinical phase involves testing the integration with NDSC's CareSelect Imaging CDSM via an API. MEDITECH makes web service requests to an external system that evaluates compliance with the AUC and returns the information to MEDITECH to be displayed to the ordering user. The second phase involves using this information to generate a payable claim within MEDITECH.

- **Compliance Deadline:** January 1, 2021
- **Code Requirements (Phase 1/Clinical):** Expanse 2.1, 6.15 pp42, 6.08 pp31, C/S 5.67 pp31, MG 5.67 pp28
- **Code Availability (Phase 1/Clinical):** Available
- **Code Requirements (Phase 2/Claims):** Code is currently in development. A priority pack top off will be required to obtain the code needed.
- **Code Availability (Phase 2/Claims):** **Available**

Next Steps For Your Organization

- License with the NDSC if you have not already done so.
- If you are below the required release for AUC Phase 1/Clinicals, you will need to take an update and roll out MEDITECH's RESTful API infrastructure. Contact your Account Manager/HCIS Coordinator immediately.
- Phase 1/Clinical testing should be completed by July 1, 2020. AUC support from MEDITECH after this date will be limited as we will need to prioritize support for the regulatory programs that commence later in the year.
- Plan resources for an update in Q3/Q4 to obtain the necessary code for Phase 2/Claims. Your Account Manager/HCIS Coordinator will reach out to you shortly to schedule your update.
- For additional information, visit our [Imaging Appropriate Use Criteria Resource Center](#).

Questions?

For AUC-specific questions, contact our [AUC Mailbox](#). Update related questions should be directed to your Account Manager/HCIS Coordinator.

Minimum Data Set (MDS)

Minimum Data Set (MDS) is part of a federally-mandated process for clinical assessment of all residents in Medicare or Medicaid certified nursing homes. Changes are released by CMS annually and delivered to MDS participants via a mass delivery.

Update (July 2020): CMS posted an updated errata (V3.00.5) for the FINAL version (v3.00.1) of the MDS 3.0 Data Specifications. Per CMS, changes will go into production on October 1, 2020. These changes will facilitate calculation of PDPM HIPPS codes on OBRA assessments for states that wish to have this calculation performed.

To Prepare For This Requirement

You must accept a mass delivery of code to address the latest changes from CMS.

- **Compliance Deadline:** **October 1, 2020**
- **Code Requirements:** N/A Mass Delivery
- **Code Availability:** TBD

Next Steps For Your Organization

- If your organization requires an update for any of the above mentioned regulatory programs, it is important to note a mass delivery of code cannot be moved LIVE during an update.
- NUR/PCS Module tasks will be opened once code is available for delivery.

Questions?

Contact your NUR/PCS Regulatory specialist.