

DECLARATION OF READINESS

District of Columbia Public Health Reporting

Updated 09/10/2020

What is a Declaration of Readiness?

The Department of Health Care Finance (DHCF) oversees the District of Columbia’s Promoting Interoperability (PI) program, formerly known as the CMS Electronic Health Records (EHR) Incentive Program or Meaningful Use (MU), which supports health care providers’ ability to electronically exchange health information.

A *declaration of readiness* is a term used to describe the current capabilities of public health registries to electronically send and receive information with health care providers. This document serves as DHCF’s *declaration of readiness* and is intended to provide consolidated information that can guide providers in meeting the PI Public Health requirement.

The PI program requirement pertaining to public health reporting is Objective 8 - Public Health and Clinical Data Registry Reporting, of which contains 5 measures (see pages 2 - 4). To meet this requirement for Stage 3, Eligible Professionals (EPs) are required to attest to “*active engagement*” for at least two of the five measures. Please note that an EP may take an exclusion for the public health registry as noted in the table below.

What is Active Engagement?

An Eligible Professional (EP) meets the PI Public Health Reporting requirement by achieving *active engagement* with a Public Health Agency (PHA) or a Clinical Data Registry (CDR). Please note, DHCF requires that EPs submit a Public Health Registry Letter demonstrating active engagement as part of their supporting documentation for the PI program. Please refer to the Attestation Checklist for more information.

Active Engagement can be demonstrated by submitting documentation that your organization has completed **any of the following three options**:

Demonstrating Active Engagement for Public Health and Clinical Data Registry Reporting
<p>Option 1: Completed Registration to Submit Data</p> <ul style="list-style-type: none"> • Registration to submit data with the PHA or CDR was completed within 60 days after the start of the EHR reporting period <ul style="list-style-type: none"> • Providers who have registered in previous EHR reporting periods do not need to submit an additional registration • EP/EH/CAH is awaiting PHA or CDR invitation to begin testing and validation
<p>Option 2: Testing and Validation</p> <ul style="list-style-type: none"> • EP/EH is in the process of testing and validation for electronic submission of data • EP/EH is required to respond to PHA or CDR requests within 30 days <ul style="list-style-type: none"> • Failure to respond twice within an EHR reporting period results in the provider NOT meeting the measure
<p>Option 3: Production</p> <ul style="list-style-type: none"> • The EP/EH has completed testing and validation of the electronic submission and is electronically submitting production data (i.e., not test data) to the PHA or CDR

Please note: This Declaration of Readiness document is based solely on information provided on: <https://dchealth.dc.gov/page/meaningful-use-mu-public-health-reporting>

What public health registry reporting options does DC Health support?

The table below outlines DC Health’s readiness to electronically exchange data with health care providers participating in Stage 3 of the Promoting Interoperability program.

Please note that public health registries should declare readiness at least six months prior to being able to receive data.

PH Measure	PH Registry Details	PH Registry Readiness Status	PH Registry Contact	PH Registry Exclusion
Measure 1 – Immunization Registry Reporting:	DC Health is accepting data sent to the District of Columbia Immunization Information System (DOCIIS) electronically from certified EHRs but is not sending immunization forecasts and histories at this time.	Currently accepting registrations to submit data Currently accepting data Not currently sending data	Balijir Ezra Manager, Assessment & Data Units, Immunization Community Health Administration (CHA) Ezra.Balijir@dc.gov O: (202) 576-9303 M: (202) 641-8542	*An EP may take an exclusion to this measure ONLY if the EP does NOT administer immunizations.
Measure 2 - Syndromic Surveillance Reporting	DC Health is not accepting data from EPs at this time.	Not currently accepting registrations to submit data Not currently accepting data	Sasha McGee, PhD, MPH Senior Infectious Disease Epidemiologist Center for Policy, Planning, and Evaluation Sasha.McGee@dc.gov O: (202) 442-9065 F: (202) 442-8060	An EP may take an exclusion to this measure.
Measure 3 – Electronic Case Reporting: (Cancer)	DC Health has identified Cancer Registry for Electronic Case Reporting and is accepting data electronically from certified EHRs at this time.	Currently accepting registrations to submit data Currently accepting data	Alfreda Woods, BS, CHES, CTR Cancer Program Manager, DCCR Community Health Administration (CHA) alfreda.woods@dc.gov O: (202) 442-9216 C: (202) 309-1340 F: (202) 442-9388	**An EP may take an exclusion to this measure ONLY if the EP does NOT diagnose or directly treats cancer.

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<p>Measure 4 – Public Health Registry: (PDMP)</p>	<p>DC Health is not accepting data from EPs at this time.</p>	<p>Currently accepting registrations to submit data</p> <p>Not currently accepting data</p> <p><i>Please note: While this registry does not meet the current PI program Stage 3 requirements, all licensed prescribers and dispensers must register to the DC PDMP for utilization purposes only.</i></p> <p><i>Grant funding is available through DC Health for integration of PDMP data into your electronic health records (EHRs). For more information on how to connect, please visit: https://dchealth.dc.gov/node/1388911</i></p>	<p>Shauna White, PharmD, RPh, MS Executive Director – DC Board of Pharmacy Program Manager - Pharmaceutical Control Division Health Regulation and Licensing Administration shauna.white@dc.gov O: (202) 442-9219 C: (202) 997-4947 F: (877) 862-4252</p>	<p>An EP may take an exclusion to this measure.</p>
<p>Measure 4 – Public Health Registry: (Other than DC PDMP)</p>	<p>DC Health has not identified any other Specialized Registries that are accepting data electronically from certified EHRs at this time.</p>	<p>Not currently accepting registrations to submit data</p> <p>Not currently accepting data</p>	<p>S/A</p>	<p>S/A</p>
<p>Measure 5 – Clinical Data Registry</p>	<p>Each provider must determine whether a national specialty society or other specialty society the provider is affiliated with sponsors a registry.</p>	<p>N/A</p>	<p>N/A</p>	<p>An EP may take an exclusion to this measure.</p>

Can an EP meet the Stage 3 Public Health reporting requirement by taking an exclusion?

For EPs, an exclusion for a measure does not count toward the total of two measures to meet the objective’s requirements. In order to meet this objective, an EP would need to meet two of the total number of measures available to them. (Available measures include ones for which the EP does not qualify for an exclusion.) If the EP qualifies for multiple exclusions and the remaining number of measures available to the EP is less than two, the EP can meet the objective by meeting the remaining measure available to them and claiming the applicable exclusions.

If no measures remain available, the EP can meet the objective by claiming applicable exclusions for all measures. If an EP is claiming an exclusion, the EP must provide a brief letter explaining the reason for this exclusion and attach the explanation as supporting documentation with their PI attestation. For example:

Dr. Smith is a pediatric oncologist and reports cancer diagnoses to the DC Cancer registry, but is unable to report to the other registries either because they do not pertain to her practice, or they are not available for reporting in the District at this time. Therefore, since the remaining number of measures made available to Dr. Smith is less than two, Dr. Smith can meet the Public Health objective by only reporting to the cancer registry and claiming the applicable exclusions for the others.

OR

Dr. Burt is unable to report to any DC Public Health registries either because they do not pertain to her practice, or they are not available for reporting in the District at this time. Therefore Dr. Burt can meet the Public Health objective by claiming the applicable exclusions for the following 2 registries [insert registries here].

***For Public Health Measure 1 – Immunization Registry:** If an EP administers immunizations, the EP may not take an exclusion for this measure. Please refer to the CMS Public Health specification sheet (below) for more information.

****For Public Health Measure 3 – Cancer Registry:** If an EP diagnoses or directly treats cancer, the EP may not take an exclusion for this measure. Please refer to the CMS Public Health specification sheet (below) for more information.

Questions? Need Assistance?

For more information on PI Public Health Reporting Objectives, Measures and Exclusions for EPs attesting to Stage 3, please refer to the CMS Public Health specification sheet: https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Downloads/TableofContents_EP_Medicaid_2019.pdf

If you need assistance with DHCF’s Promoting Interoperability Program, please contact:

Specialty Area	Contact	Email	Phone
MEIP General Inquiries	Euarda Koch	eduarda.koch@dc.gov	(202) 673-3561
MEIP Pre-Payment Verification	Adaeze Okonkwo	Adaeze.Okonkwo@dc.gov	(202) 478-9227
eHealthDC Technical Assistance Inquiries	TA Team	contact@e-healthdc.org	(202) 552-2331

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