



Vision

Our vision at Cogon is to be the leading facilitator of healthcare connectedness via value-driven innovations and comprehensive thought leadership.

Deciphering Meaningful Use Requirements

Have you deciphered over 690 pages of meaningful use requirements? Do the requirements seem ridiculously complicated? The Strategy, Policy & Relations Group at Cogon is unraveling the mysteries. There is a lot at stake. The Department of Health and Human Services estimates between \$13.2 and \$22.9 billion in outlays for Medicare and Medicaid eligible hospitals and physician providers demonstrating meaningful from 2011 to 2014 alone. Over the period from 2011-2019 HHS estimates outlays between \$17.7 and \$28.9 million. Toward the end of this period, and particularly for Medicare eligible providers, HHS estimates that there would be between \$3.4 and \$1.4 billion in reduced payments under Medicare for those not achieving meaningful use.

If you want to properly plan, Cogon can be your trusted advisor. Whether your hospital or practice is far along in the use of health information technology or not, you may or may not qualify for the Medicare and Medicaid meaningful use incentives. If you are a health information technology provider, your solutions suite may need to be deemed certified EHR technology for your customer to receive incentives. Components of your solution suite might need to be configured to meet a broad variety of functions that will be considered 'meaningful use' as well as show actual use of the functionality.

The proposed regulations are very complicated and go well beyond the statutory minimums. In effect, the rules not only cover whether hospitals or physicians utilize health information technology, but also how they use it and how often. The requirements require that you accomplish a broad variety of function using certified EHR technology.

- Under the proposed regulations one must show they have "used" certified electronic health information technology and specific that technology. However, that technology does not have to be one thing or of one piece – there can be different modules, presumably with separate certifications.
- In the proposed rule there are requirements to satisfy objectives and measures. Yet, for many it is unclear whether, how, or in what sequence the certified EHR technology needs to be involved.
- There is a range of issues attached to percentage requirements in terms of figuring out numerators, denominators, and the burden associated with showing use or application of a measure
- While certified EHR technology may, in part, serve the function, other technology or methods may also perform part of the listed function. Whether and how such arrangements satisfy the regulatory regime comprises a set of issues.
- It is possible in various health information exchanges and other settings for functionality to be shared or owned by others. Responsibility and being able to show compliance will create some complexity.

Our Meaningful Use expert, Nandan Kenkeremath, Managing Principal, is a member of the Health Information Management Systems Society's (HIMSS) meaningful use response group and the HIMSS legislative and regulatory review task force. This work includes a system of discussions with various parties to try to understand, and eventually comment on the regulations. Cogon has already conducted several additional stakeholder calls. We are representing clients in assisting in the public comment process.

In addition to the decades of legislative and regulatory expertise Nandan brings to the table, Cogon has experts in the operational space that have managed health information exchanges and been the technology partners for hospitals, exchanges and professional groups. We know how things can fit together and what the application of these provisions may mean in real life settings. Let us help you decipher meaningful use and its implications on your organization and plan accordingly.

Cogon Systems, Inc. (COGON) is a Pensacola, Florida - based health information technology and consulting firm with locations in Miami, Atlanta, and Washington, D.C that facilitates healthcare connectedness via value-driven innovations and comprehensive thought leadership.

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