

## Medicaid Promoting Interoperability (PI) Program Frequently Asked Questions: Program Year 2021 Clinical Decision Support

#	Question and Answer
1	<p><b>Q: How does an eligible professional (EP) meet the clinical decision support (CDS) objective?</b></p> <p><b>A:</b> An EP must satisfy both measures identified below for this objective through a combination of meeting the thresholds and exclusions.</p> <ul style="list-style-type: none"> <li>• <b>Measure 1:</b> Implement five CDS interventions related to four or more electronic clinical quality measures (eCQMs) at a relevant point in patient care for the entire PI (EHR) reporting period.</li> <li>• <b>Measure 2:</b> Enable and implement the functionality for drug-drug and drug-allergy interaction checks for the entire PI (EHR) reporting period.</li> </ul>
2	<p><b>Q: What is CDS?</b></p> <p><b>A:</b> CDS is health information technology functionality that builds upon the foundation of an EHR to provide persons involved in care processes with general and person-specific information, intelligently filtered and organized, at appropriate times, to enhance health and health care.</p>
3	<p><b>Q: What methods are sufficient for supporting CDS interventions?</b></p> <p><b>A:</b> While many providers may associate CDS with pop-up alerts, alerts are not the only method of providing support. CDS can be provided in various ways including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Interruptive activities such as “pop-up” alerts;</li> <li>• Information displays or links (such as InfoButton); or</li> <li>• Targeted highlighting of relevant data.</li> </ul> <p>There is no definitive or comprehensive list of what can constitute CDS. Certain types of CDS that would meet the meaningful use definition include support for public health report and patient safety reporting.</p>
4	<p><b>Q: When should an EP implement the CDS interventions?</b></p> <p><b>A:</b> The 5 CDS interventions should be enabled prior to or during the PI (EHR) reporting period. The same interventions do not have to be implemented for the entire PI (EHR) reporting period as long as the threshold of five is maintained for the duration of the PI (EHR) reporting period.</p> <p>EPs should implement the CDS intervention at a relevant point in clinical workflows when the intervention can influence clinical decision making before diagnostic or treatment action is taken in response to the intervention.</p>
5	<p><b>Q: Do all CDS interventions have to be related to eCQMs?</b></p> <p><b>A:</b> No, not all CDS interventions have to be related to eCQMs. However, to qualify for this measure an EP must implement five CDS interventions related to <u>four or more eCQMs</u> at a relevant point in patient care for the entire PI (EHR) reporting period.</p>

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6	<p><b>Q: Do the CDS interventions have to be related to the eQMs that an EP has chosen to report on?</b></p> <p><b>A:</b> No, CDS interventions are not required to be related to the same eQMs that an EP has chosen to report. The CDS intervention should be aimed at prospectively advancing the same clinical goal or guideline promoted by the eQM.</p>
7	<p><b>Q: What if there are not four or more eQMs applicable to an EP's scope of practice?</b></p> <p><b>A:</b> If there are limited eQMs applicable to an EP's scope of practice, the EP should implement CDS interventions that he or she believes will drive improvements in the delivery of care for high-priority health conditions relevant to their specialty and patient population.</p> <p>These high priority conditions must be determined prior to the start of the PI (EHR) reporting period in order to implement the appropriate CDS to allow for improved performance.</p>
8	<p><b>Q: Is an EP able to count drug-drug and drug-allergy interactions as one of the five CDS interventions?</b></p> <p><b>A:</b> No, drug-drug and drug-allergy interactions are separate from the five CDS interventions and do not count toward the five required CDS interventions for measure 1.</p>
9	<p><b>Q: What changed between Program Year (PY) 2020 to 2021 for objective 3, measure 1?</b></p> <p><b>A:</b> The PI (EHR) reporting period changed between PY 2020 and 2021 for meaningful use. The last day of the PI (EHR) reporting period must fall on or before October 31, 2021.</p>
10	<p><b>Q: Are there any available exclusions for objective 3, measure 1?</b></p> <p><b>A:</b> No, there are no allowable exclusions available for objective 3, measure 1.</p>
11	<p><b>Q: What should the documentation show to reflect that CDS rules (objective 3, measure 1) were enabled during the PI (EHR) reporting period?</b></p> <p><b>A:</b> The documentation should:</p> <ul style="list-style-type: none"> <li>• Include the provider and/or practice name;</li> <li>• Five CDS rules related to four or more eQMs were enabled;</li> <li>• Be clearly legible; and</li> <li>• Reflect the date the requirement was met during the PI (EHR) reporting period.</li> </ul> <p>For example, screen shots from the certified electronic health record technology (CEHRT) showing the five different CDS rules were enabled during the PI (EHR) reporting period.</p> <p>When taking screen shots, capture the date on your computer screen (usually located in the bottom right corner).</p>

#	Question and Answer
12	<p><b>Q: Does an EP have to enable and implement the functionality for drug-drug and drug-allergy interaction checks to meet the requirements for objective 3, measure 2?</b></p>
	<p><b>A:</b> Yes, an EP must enable and implement the functionality for drug-drug and drug-allergy interaction checks to meet the requirements for objective 3, measure 2.</p>
13	<p><b>Q: What changed between PY 2020 to 2021 for objective 3, measure 2?</b></p>
	<p><b>A:</b> The PI (EHR) reporting period changed between PY 2020 and 2021 for meaningful use. The last day of the PI (EHR) reporting period must fall on or before October 31, 2021.</p>
14	<p><b>Q: What exclusions are available to an EP for objective 3, measure 2?</b></p>
	<p><b>A:</b> An EP may take an exclusion if the EP writes fewer than 100 medication orders during the PI (EHR) reporting period.</p>
15	<p><b>Q: What should the documentation show to reflect that the EP meets the exclusion for objective 3, measure 2 discussed in the previous question?</b></p>
	<p><b>A:</b> The following types of documentation would be sufficient to support that the EP meets the exclusion:</p> <ul style="list-style-type: none"> <li>• The CEHRT dashboard shows that the EP wrote fewer than 100 medication orders during the PI (EHR) reporting period; or</li> <li>• Provide supporting documentation, other than the CEHRT dashboard, that demonstrates the EP has fewer than 100 medication orders.</li> </ul>
16	<p><b>Q: What should the documentation show to reflect that drug-drug and drug-allergy interaction checks (objective 3, measure 2) were enabled during the PI (EHR) reporting period?</b></p>
	<p><b>A:</b> The documentation should:</p> <ul style="list-style-type: none"> <li>• Include the provider and/or practice name;</li> <li>• Drug-drug and drug-allergy interaction checks were enabled;</li> <li>• Be clearly legible; and</li> <li>• Reflect the date the requirement was met during the PI (EHR) reporting period.</li> </ul> <p>For example, screen shots from the CEHRT showing that drug-drug and drug-allergy interaction checks were enabled during the PI (EHR) reporting period.</p> <p>When taking screen shots, capture the date on your computer screen (usually located in the bottom right corner).</p>