

Certification Flexibility Rule

Effective October 1, 2014

PURPOSE:

The rule grants flexibility to providers unable to *fully implement* 2014 Edition Certified Electronic Health Record Technology (CEHRT) for an EHR reporting period in 2014 due to delays in 2014 CEHRT availability. Providers may now use EHRs that have been certified under the 2011 Edition, a combination of the 2011 and 2014 Editions, or the 2014 Edition for 2014 participation.

Certification Flexibility Rule Attestation Options

You would be able to attest for MU:

If you were scheduled to demonstrate:	You would be able to attest for MU:		
	<u>Using 2011 Edition CEHRT to do:</u>	<u>Using 2011 & 2014 Edition CEHRT to do:</u>	<u>Using 2014 Edition CEHRT to do:</u>
<u>Stage 1 in 2014</u>	2013 Stage 1 objectives and measures*	2013 Stage 1 objectives and measures* -or- 2014 Stage 1 objectives and measures*	2014 Stage 1 objectives and measures
<u>Stage 2 in 2014</u>	2013 Stage 1 objectives and measures*	2013 Stage 1 objectives and measures* -or- 2014 Stage 1 objectives and measures* -or- Stage 2 objectives and measures*	2014 Stage 1 objectives and measures* -or- Stage 2 objectives and measures

* Only providers that could not fully implement 2014 Edition CEHRT for the EHR reporting periods in 2014 due to delays in 2014 Edition CEHRT availability.

The rule operationalizes the term unable to fully implement as:

- Software development delays
- Missing or delayed software updates
- Being able to implement 2014 CEHRT for the full reporting period
- Unable to train staff, test the updated system, or put new work flows in place because of delays associated with installation of 2014 CEHRT
- Unable to meet stage 2 summary of care measures because the recipient of transmittals was impacted by 2014 CEHRT issues

Reasons not recognized in the final rule:

- Financial issues
- Inability to meet one or more measures
- Staff turnover and changes
- Provider waited too long to engage a vendor
- Refusal to purchase the requisite software updates
- Providers who fully implemented 2014 Edition CEHRT

Additional Considerations:

- Providers using a combination of 2011 and 2014 CEHRT must have a certification number with H13 as the third through fifth digit. Use of a combo certification number involves the provider using 2011 edition CEHRT for part of the EHR reporting period and 2014 edition CEHRT for the rest of the reporting period.
- If using a flexibility option, do not start a Program Year 2014 application until system changes (expected Spring 2015) have been completed. If you have begun the application process, the application must be aborted and a new application started to have the flexibility choices.
- Documentation will be required detailing why a 2014 CEHRT could not be fully implemented. The {hyperlink} should be completed and uploaded as part of your application.
- Providers attesting to AIU must have 2014 CEHRT .