



DEC 2 2019

Dear Tribal Leader and Urban Indian Organization Leader:

As part of our ongoing and regular communications about the progress of Health Information Technology (IT) development and certification efforts, by letter dated November 19, 2018, I informed you that updates to the Indian Health Service (IHS) Resource and Patient Management System (RPMS) to meet 2015 Edition certification requirements published by the Office of the National Coordinator for Health Information Technology (ONC) would not be completed by the end of 2019.

This meant that Eligible Clinicians (EC) and Eligible Hospitals (EH) that utilize RPMS and participate in various quality initiatives sponsored by the Centers for Medicare & Medicaid Services (CMS) (e.g., Quality Payment Programs (QPP) and Hospital Inpatient Quality Reporting Program) would not be able to attest using certified Health IT to qualify for incentives under these programs for the current calendar year (2019).

In its rollout of these requirements, CMS acknowledged that circumstances like these, beyond the direct control of participating EC/EH, do occur for many reasons. Accordingly, CMS has published guidance to advise EC/EH how to apply for “hardship exceptions” or “Extraordinary Circumstance Exceptions (ECE)” to minimize any financial impacts of not having access to certified Health IT.

I am writing to make you aware of the upcoming deadline to file an application for a hardship exception for not having access to certified Health IT.

The deadline to submit a hardship exception application to CMS for the QPP Promoting Interoperability Performance Category is Tuesday, December 31, 2019.

Instructions to complete this process and information on the Merit-based Incentive Payment System (MIPS) are available at the CMS Web site: <https://qpp.cms.gov/mips/exception-applications>. Please see the provided Enclosure for further details.

Related RPMS Updates

The project to complete 2015 Edition certification is well underway, with plans to release the certified updates by the end of fiscal year (FY) 2020. We will continue to advise you on the progress of this project throughout the coming year.

In the past few months, we have reached the following important RPMS milestones.

- RPMS electronic Clinical Quality Measures (eCQM) were updated and certified to meet CMS requirements for 2019. These enhancements are set to be deployed to the field before the end of this year.

Although these measures cannot be used for 2019 electronic reporting because the RPMS Electronic Health Record (EHR) does not yet have full 2015 Edition certification, sites can use the 2019 eCQM tools to benchmark themselves and their providers against current standards across the country.

These measures will continue to be available for the calendar year 2020 reporting cycle, so they can be used now to establish a baseline against which EC/EH seek to improve performance over the coming year.

- RPMS EHR capabilities to support Electronic Prescribing for Controlled Substances (EPCS) were released earlier this year and are now being deployed to the field.

A long-awaited enhancement for prescribing providers, EPCS eliminates the need for paper or printed prescriptions for controlled substances. This capability allows for direct electronic transmission of these prescriptions to onsite or community pharmacies. This significantly reduces the risk for controlled drug diversion or abuse, and aligns with practices in a number of states, whose laws now require exclusive use of electronic prescriptions.

If you have questions or concerns about these issues, please directly contact Dr. Susy Postal, IHS Chief Health Informatics Officer, by telephone at (301) 348-3378 or by e-mail at susy.postal@ihs.gov, or Mr. Mitchell Thornbrugh, IHS Chief Information Officer, by telephone at (301) 443-2019 or by e-mail at mitchell.thornbrugh@ihs.gov.

Sincerely,

/Michael D. Weahkee/

RADM Michael D. Weahkee, MBA, MHSA
Assistant Surgeon General, U.S. Public Health Service
Principal Deputy Director

Enclosure: Applying for Centers for Medicare & Medicaid Services Merit-based Incentive Payment System Program Hardship Exceptions