



SEP 16 2020

Dear Tribal Leader and Urban Indian Organization Leader:

I am writing to provide updates since my letters dated November 19, 2018, and December 2, 2019, regarding the Indian Health Service (IHS) Resource and Patient Management System (RPMS) meeting the 2015 Edition certification requirements published by the Office of the National Coordinator for Health Information Technology (ONC).

The 2015 Edition testing for the Base Electronic Health Record (EHR) will be wrapping up. A national release date is planned for approximately September 15, 2020. This date will provide sufficient time for sites to install the new software before the final 90-day reporting period for calendar year 2020 begins in October. This will allow sites participating in certain Centers for Medicare & Medicaid Services (CMS) quality programs to report use of a 2015 Edition certified EHR.

However, there are some CMS quality programs in which RPMS sites participate that require certifications beyond the Base EHR that are still in development, specifically in the area of electronic prescribing (e-prescribing). While e-prescribing in RPMS is fully functional for sites that use it, some of the 2015 Edition requirements have yet to be completed. This means that Eligible Clinicians (EC) and Eligible Hospitals (EH) participating in some CMS quality programs will have impacts as follows:

- EC/EH participating in the Medicare Promoting Interoperability [Program](#) may see a negative payment adjustment for Medicare patients if they have submitted more than five hardship exceptions (maximum number allowed); this does not impact Medicare's all-inclusive rate for the IHS;
- EC/EH participating in the Medicaid Promoting Interoperability [Program](#) will not receive incentive payments for using 2015 Edition certified EHR technology;
- EC and clinician groups participating in the CMS Quality Payment Program (QPP) Merit-based Incentive Payment System (MIPS) may apply for a QPP exception to reweight the MIPS Promoting Interoperability category and avoid payment adjustments.

CMS acknowledges that there are many circumstances, including the COVID-19 emergency, that are beyond the direct control of participating EC/EH and occur for many reasons. Accordingly, CMS has published guidance to advise EC/EH how to apply for hardship exceptions to minimize any financial impacts of not having access to certified Health Information Technology. Details on applying for such an exception can be found at <https://qpp.cms.gov/mips/exception-applications>, and are also described in the enclosure to this letter.

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For the QPP MIPS program, the Promoting Interoperability Performance Category Hardship Exception Application for Performance Year 2020 is currently open and will close on December 31, 2020.

Summary of 2015 Edition RPMS Updates

The release of the 2015 Edition certified RPMS software in September will cap a year in which numerous important milestones were achieved. This year's releases address improvements to functionalities in auditing, demographics, pharmacy, e-prescribing, immunizations, implantable devices, Consolidated Clinical Document Architecture, Transitions of Care, Clinical Information Reconciliation, the Personal Health Record portal, and more. Once the certification is complete, details about these enhancements can be found online at <https://www.ihs.gov/promotinginteroperability/certificationoverview/>. Training is underway on the newest releases, and resource materials and recordings are being developed to address the changes.

If you have questions or concerns about any of these issues, please directly contact Dr. Susy Postal, IHS Chief Health Informatics Officer, by telephone at (240) 429-5816 or by e-mail at susy.postal@ihs.gov, or Mr. Mitchell Thornbrugh, IHS Chief Information Officer, by telephone at (240) 620-3117 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
Director

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