



ELIGIBLE HOSPITAL/CRITICAL ACCESS HOSPITAL ELECTRONIC LABORATORY REPORTING (2015 MODIFIED STAGE 2 MU, OBJECTIVE 10, MEASURE 4)

OHIO'S MEANINGFUL USE POLICY

ELECTRONIC LABORATORY REPORTING REQUIREMENTS

Electronic laboratory reporting is required for 2015 Modified Stage 2 Meaningful Use for eligible hospitals (EH) or Critical Access Hospitals (CAH) unless the facility does not conduct any testing for reportable diseases or sends all such testing to a reference lab. Submitting all laboratory findings indicative of reportable infectious diseases for tests performed at the EH is preferred. At a minimum, lab results for the following diseases must be reported by ELR to meet 2015 Modified Stage 2 Meaningful Use requirements:

- | | |
|--------------------------|-------------------|
| 1. Campylobacteriosis | 8. HIV |
| 2. Chlamydia Infections | 9. Pertussis |
| 3. Cryptosporidiosis | 10. Salmonellosis |
| 4. Giardiasis | 11. Shigellosis |
| 5. Gonococcal Infections | 12. Syphilis |
| 6. Hepatitis B | 13. Varicella |
| 7. Hepatitis C | |

If the EH chooses to send lab results for only these 13 diseases by ELR, the EH must continue to report lab results for all other reportable infectious diseases in another manner per Ohio Administrative Code. The system used by ODH to capture reportable disease information is called the Ohio Disease Reporting System (ODRS). Currently, EHs may submit data into ODRS in one of two ways: through direct data entry or via automatic interface (data feed; ELR). Submission via automatic interface (ELR) is required to meet Modified MU2.

Historically, every hospital and commercial laboratory maintained its own nomenclature of how laboratory tests are named, codified and supplied to physicians or public health agencies. To achieve Modified MU2, hospitals must identify laboratory tests for reportable conditions using LOINC codes, a standard coding methodology and exchange results using a specific interoperability standard (HL7 v2.5.1). SNOMED codes are also required to report organisms and other non-numeric results.

Related Link: <https://www.ohiopublichealthreporting.info/Enrollment/MeaningfulUse/LabReporting>

2015 MODIFIED STAGE 2 OBJECTIVE AND MEASURE

- **Objective 10:** The EH or CAH is in active engagement with a public health agency to submit electronic public health data from certified electronic health record technology (CEHRT), except where prohibited and in accordance with applicable law and practice. EHs/CAHs must meet three of four public health measures. Exclusions may apply. (*Note: The CMS specification sheet lists this objective as #9, but the final rule defines the objective as #10.*)
- **Active Engagement:** To be considered “actively engaged,” a provider must:

Public Health Reporting

- ✓ Option 1 – Register to submit data (prior to or within the first 60 days of EHR reporting period) and await invitation from ODH to begin
 - ✓ Option 2 – Begin testing and validation stage with ODH
 - ✓ Option 3 – Send Production data to ODH
-
- Alternate Specification: An eligible hospital or CAH scheduled to be in Stage 1 in 2015 may meet two measures.
 - Measure 4: The EH or CAH is in active engagement with a Public Health Agency (PHA) to submit electronic reportable laboratory (ELR) results from CEHRT except where prohibited and in accordance with applicable law & practice.

Related Link: [2015 Modified Stage 2 Fact Sheet for EH/CAH Public Health Reporting](#)

APPLICABLE EXCLUSIONS

ODH Policy: An EH/CAH may claim an exclusion if the hospital does not conduct any testing in-house for the minimum reportable infectious diseases identified above or if the hospital sends all such testing to a reference lab.

IMPORTANT CLARIFICATIONS

1. *Can an EH take an exclusion for the Modified 2015 MU2 ELR measure, if they outsource all of the minimum scope of reportable conditions to a reference or commercial laboratory?*

Yes, this is true for Ohio hospitals. As noted under the MU Policy on [ODH's ELR website](#), electronic laboratory reporting is required for Modified Stage 2 Meaningful Use for eligible hospitals (EHs) **unless the facility does not conduct any testing for reportable diseases or sends all such testing to a reference lab**. This is true whether the reference lab is located within or outside the state.

What is less clear is the exclusion you must take in this instance. Because each state can differ on who must report disease conditions (i.e., the performing lab or ordering facility), CMS did not provide a clear option for this scenario under their list of possible exclusions. However, CMS did previously clarify in [FAQ 9204](#) that hospitals should choose the following exclusion in this case:

- “Operates in a jurisdiction for which no public health agency is capable of receiving electronic reportable laboratory results in the specific standards required for certified EHR Technology at the start of their EHR reporting period”.

If you do qualify for this exclusion, ODH stated it is not necessary to register to submit data for the ELR program. For audit documentation related to taking this exclusion, ODH recommends printing a screen shot of their MU Policy as noted on the website mentioned above. It may also be helpful to obtain an email or letter from your Lab Director confirming that the minimum scope of reportable conditions are performed by a reference or commercial laboratory.

2. *What is the Modified MU2 Policy for EHs who perform tests for some but not all of the 13 minimum reportable conditions?*

Public Health Reporting

To meet the Modified MU2 measure, EHs must electronically report the qualifying tests they performed of the 13 minimum reportable conditions. If an EH performs some of the tests and outsources the rest to a reference lab, they only need to report the tests the EH performs.

OHIO PUBLIC HEALTH REPORTING ENROLLMENT AND REGISTRATION TO SUBMIT

EHs must request enrollment into ODH's public health reporting programs and register to submit data through the Ohio Public Health Reporting Enrollment website.

- EHs that are technically and operationally ready to report electronic laboratory reportable data must register to submit data through the Ohio Public Health Reporting Enrollment website by the 60th day of their intended reporting period.
- EHs should not re-register for a measure when transitioning between MU stages or reporting periods.
- It is preferred that provider groups and health systems register as entities, not individuals.
- ODH will prioritize which providers to invite for onboarding if resources do not allow all providers to submit data.

Related Link: <https://www.ohiopublichealthreporting.info/Enrollment> (Ohio Public Health Enrollment Site)

PREFERRED USE OF HIES

ODH prefers the use of health information exchanges (HIEs) for public health reporting. CliniSync and HealthBridge are Ohio-based HIEs that are able to submit data to ODH. For EHs and EPs not working with an HIE and for providers who have determined that it is not feasible to conduct public health reporting through an HIE, ODH will accept data directly from EPs and EHs. The registration to submit data process is the same for either method of data transmission.

HOSPITAL READINESS CHECKLIST

CHECKLIST FOR EHs WHO WANT TO BEGIN ELECTRONIC LABORATORY REPORTING TO ODH THROUGH CLINISYNC

- ✓ You have finalized and notified us of your plans to submit electronic laboratory reporting (ELR) or other public health reporting through CliniSync including the reporting period when you wish to begin and primary contact for public health reporting.
Note: Please ensure Peg Eichner (meichner@ohionline.org) is copied on these communications.
- ✓ You have formed an ELR implementation team, which includes at a minimum, representatives from your Laboratory Department, Infectious Disease and IT staff.
Note: It is very important to include Infectious Disease staff so you can coordinate efforts between manual reporting that occurs today and ELR reporting in the future including clearly delineating responsibilities between Infectious Disease and Laboratory personnel.
- ✓ You have participated in a CliniSync Public Health Overview session.
Note: Peg Eichner, your Account Manager or Implementation Manager can provide available dates/times.
- ✓ You have requested enrollment in ODH's Electronic Laboratory Reporting program. ODH will require the EH's Clinical Laboratory Improvement Amendments (CLIA) number and name to identify the

Public Health Reporting

hospital.

- ✓ You have deployed your 2014 ONC certified solutions in your Production environment.
- ✓ In your source system, you have crosswalked the lab tests you perform which identify the minimum 13 reportable disease conditions to standard codes (LOINC) and/or SNOMED codes for organisms or non-numeric results.
- ✓ You have completed CliniSync's ELR implementation tool for the minimum 13 reportable diseases conditions required to meet Ohio's ELR Modified MU2 policy.
- ✓ You can produce a HL7 v2.5.1 ELR results which contain actual data for only those lab tests with results that qualify it as a reportable condition to ODH. This file must include the standard required HL7 data elements as well as ODH required data elements.
- ✓ You have conducted online file and validation testing using NIST validation tools available at <http://hl7v2-elr-testing.nist.gov/mu-elr/> See Technical Requirements, Automated Test Validation Tool for more information.
- ✓ You have completed your registration to submit data for Electronic Laboratory Reporting (ELR) by the 60th day of your intended reporting period through the ODH Public Health Reporting Enrollment Website.
- ✓ Once your interface project has been scheduled with Medicity and you have completed your ODH registration to submit data, you will be in "awaiting invitation from ODH" status.

Note: It is very important that you actively continue to test and validate your interfaces while awaiting invitation.

CLINISYNC STEPS

- ✓ Once officially notified and provided a primary contact, CliniSync will initiate scheduling of your ELR reporting interface with Medicity.
Note: This process takes a minimum of four weeks after official notification.
- ✓ The scheduling process will identify when your interface will be deployed into CliniSync's testing (CERT) or production (PROD) environments. These dates will be provided to you by CliniSync, once available.
- ✓ Once the interface is available in the CliniSync testing (CERT) environment, CliniSync will work with you and ODH to conduct testing, confirm successful delivery, conduct parallel testing and allow for production delivery.

Note: This final step is contingent upon ODH availability and integration priorities.

A word about cost: For existing hospital clients, Implementation fees will be waived for one new interface per year. If you have questions about how this applies to you, please discuss this with your CliniSync representative.

TECHNICAL REQUIREMENTS

FORMAT

CliniSync/ODH will only accept ELR messages using the required HL7 v2.5.1 format and incorporating ODH data requirements and appropriate vocabulary. EHs must limit the ELR messages to only those lab tests which may result in the minimum 13 reportable disease conditions (or more) required to meet Ohio's ELR Modified MU2 policy. Further, EHs must build filters to limit the messages to reportable results.

Public Health Reporting

ODH centralizes all technical format, field requirements and required code sets on its ELR page under the Public Health Reporting Enrollment website:

<https://www.ohiopublichealthreporting.info/Enrollment/Programs/InfectiousDisease>

The following information is available through this site:

- HL7 2.5.1 Implementation Guide –
 - Nationally, ONC and the CDC require providers to submit the data using a specific implementation guide for ELR reporting: Electronic Laboratory Reporting to Public Health, Release 1 with Errata and Clarifications and ELR 2.5.1 Clarification Document for EHR Technology Certification
- ODH Required and Supported Fields
- Vocabulary (Information)
- Meaningful Use V2 Message Validation Tool Site

OTHER TECHNICAL INFORMATION

- CliniSync created an implementation tool to assist EHs in identifying the lab tests they perform which may result in the minimum 13 reportable diseases conditions required to meet Ohio's ELR Modified MU2 policy. Our implementation team will provide you with a copy of this tool upon request.
 - **Note:** The first tab in the file named "Example Tab" includes general instructions and examples of how to complete the tool.
- This tool is designed to assist EHs with three levels of preparation and analysis required for ELR reporting:
 - #1:** Identify the lab tests you perform which may result in the minimum 13 reportable disease conditions required to meet Ohio's ELR Modified MU2 policy.
 - Example:** Identifying the types of Hepatitis B diagnostic testing you may conduct such as antibody tests, antigen tests, or DNA tests.
 - #2:** Crosswalk these lab tests to standard codes (LOINC) in a manner which provides enough specificity about the nature of how the test was conducted.
 - Example:** The LOINC code for "Hepatitis B virus core Ab [Presence] in Serum" is 16933-4 and the LOINC code for "Hepatitis B virus core Ag [Presence] in Tissue by Immune stain" is 10673-2.
 - #3:** Identify reportable results, crosswalk non-numeric reportable results to SNOMED codes, and filter only to those lab tests with results that qualify it as a reportable condition to ODH.
 - Example:** Only Hepatitis B tests where the result is positive would be reported.
- At this time, CliniSync cannot support ADT enrichment for ELR messages. For example, some hospitals have encountered difficulty with capturing ethnicity within their lab source system. ODH is willing to work with clients who are unable to provide ethnicity.
- Centers for Disease Control and Prevention in coordination with the Council of State and Territorial Epidemiologists have created the national Reporting Condition Mapping Table (<http://www.cdc.gov/EHRmeaningfuluse/rcmt.html>) that provides further guidance on appropriate vocabularies usable for reportable conditions across the country for reporting of ELR data.

Public Health Reporting

AUTOMATED TEST VALIDATION TOOL

EHS should conduct online file and validation testing for ELR using NIST validation tools available at <http://hl7v2-elr-testing.nist.gov/mu-elr/>. ODH will also work with the EH to pre-test and validate their interface until they are working as expected.

Please note there are a few message header (MSH) field requirements which may produce errors through the NIST tool, but which ODH is expecting. You may ignore these errors. Examples are:

- The NIST tool may expect a message header (MSH) to look like:
MSH|^~\&#|NIST^2.16.840.1.113883.3.72.5.20^ISO|NIST^2.16.840.1.113883.3.72.5.21^ISO|NIST^2.16.840.1.113883.3.72.5.22^ISO|NIST^2.16.840.1.113883.3.72.5.23^ISO|20120821140551-0500||ORU^R01^ORU_R01|NIST-ELR-006.02|T|2.5.1|||NE|NE|||PHLabReport-NoAck^HL7^2.16.840.1.113883.9.11^ISO
- For MSH.4 ODH requires a CLIA Identifier, so instead of |NIST^2.16.840.1.113883.3.72.5.22^ISO| ODH needs something like |NIST^78F12345^CLIA|
- ODH needs MSH.15 and MSH.16 to be empty (if possible) so they can track errors

ONC CERTIFICATION REQUIREMENTS

CLINISYNC CERTIFICATION

CliniSync and its technology partner, Medicity, received 2014 ONC modular EHR Certification (CEHRT) for all public health reporting measures in December 2013. The certification product number for electronic lab reporting (ELR) is CHPL Product Number 12122013-1978-6.

HOSPITAL SYSTEM CERTIFICATION

Please notify CliniSync staff if the system you are using to submit ELR data is NOT 2014 CEHRT certified for Modified MU2 reporting. As long as you can still provide the ELR data in the Ohio required technical format, we can work with you to meet certification requirements.

- **Note:** There have been several instances where hospitals were not able to provide data in the Ohio-required format unless they accepted their source system 2014 certified version upgrades.

Related Link: <http://oncchpl.force.com/ehrcert?q=chpl> (Certified Health IT Product List for 2011/2014)

QUESTIONS

- Questions about ODH's MU policy or technical format requirements should be directed to ELR@odh.ohio.gov.
- Questions about CliniSync's implementation process should be directed to meichner@ohionline.org or call 614.664.2609.

HELPFUL LINKS

- [Ohio Department of Health Meaningful Use website](#)
- [Ohio Department of Health Public Health Reporting Enrollment website](#)

Public Health Reporting

- [Ohio Department of Health Public Health Reporting Enrollment website ,ELR Page](#)
- [2015 Modified Stage 2 Fact Sheet for EH/CAH Public Health Reporting](#)
- [Automated NIST ELR Validation Tool](#)
- [Certified Health IT Product List](#) (2011 and 2014)