



CMS releases Stage 3 Meaningful Use proposed rule

March 25, 2015

On March 20, 2015, the Centers for Medicare & Medicaid Services (CMS) released the highly anticipated [Stage 3 Meaningful Use Proposed Rule](#). This rule was filed for public inspection and will appear in the Federal Register on March 30, 2015, and the comment period runs until May 29, 2015.

As expected, the Stage 3 Proposed Rule includes new criteria that providers, including eligible professionals (including physicians), eligible hospitals and critical access hospitals must meet to qualify for electronic health record incentive payments and to avoid payment adjustments. Overall, CMS believes the Proposed Rule attempts to give providers more flexibility and to simplify requirements for providers by focusing on advanced use of electronic health records (EHRs) and dropping requirements that already have widespread adoption or are no longer relevant.

Highlights of the Stage 3 Proposed Rule include:

- Delaying mandatory compliance with the Stage 3 criteria until 2018, with optional compliance available in 2017.
- Moving hospital reporting periods to be the same as physicians, changing from October-September years to a calendar year reporting period.
- All reporting periods are for the full calendar year, except for hospitals and physicians attesting to meaningful use for Medicaid for the first time, which has a 90-day reporting period.
- Reducing the number of Stage 3 criteria to eight (currently Stage 2 requires 19 criteria for hospitals and 20 for physicians).
- Electronic submission of clinical quality measures will be optional in 2017 and mandatory starting in 2018.
- Meaningful Use criteria will be aligned with clinical quality reporting being separately and simultaneously required of hospitals through the Hospital Inpatient Quality Reporting Program and of physicians through the PQRS program.



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- Generally, the Stage 3 criteria require more interoperability, coordination of care among providers and patient access to their medical records and patient-specific education resources.

In conjunction with CMS' release of the Stage 3 Proposed Rule, the Office of National Coordinator for Health Information Technology released its proposed technical rule for the [2015 Edition EHR certification criteria](#). This proposed rule attempts to establish new criteria for the certification of EHR technology. Among other things, the new criteria provides the opportunity for EHR technology certification for providers that are not currently eligible for EHR incentive payments, such as long-term post-acute care and behavioral health providers.

There may still be more EHR rulemaking to come. On January 29, CMS announced its intent to revamp additional rules this spring that could include shortening the reporting period for 2015 to 90 days and moving hospitals to a calendar year reporting period to allow them more time to satisfy the 2014 CEHRT criteria.