

## Finalized Stage 3 Rule means big changes for meaningful use starting in 2015, especially for hospitals

October 7, 2015

A final rule filed on Tuesday, October 6, 2015, by the Centers for Medicare and Medicaid Services implemented a number of changes to the Meaningful Use Electronic Health Record Incentive Program, effective immediately. The changes include implementing a 90-day reporting period and adjusting the reporting period for hospitals from the federal fiscal year to the calendar year.

The final rule was filed with the Office of the Federal Register and is not scheduled to be officially published in the *Federal Register* until October 16, 2015. In its “unpublished” form, the rule is 752 pages long and addresses many aspects of meaningful use beginning in 2015, as well as throughout the next three years and beyond. Technically, the rule will not be effective until December 15, 2015, but because it impacts 2015 reporting periods and attestation deadlines currently ongoing, the rule’s practical effects are immediate. There are also certain aspects of the final rule that invite comments with December 15 also being the deadline for submitting those comments.

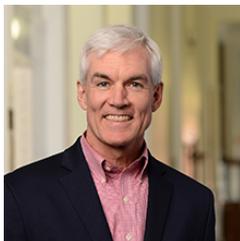
A more detailed bulletin addressing specific details of the rule is forthcoming, but here are several highlights from the final rule:

1. The single final rule is a consolidation of two proposed rules that were issued in March 2015. The rule addresses both Stage 3 meaningful use requirements and the changes to the meaningful use program from 2015 through 2017.
2. As mentioned, the rule grants a 90-day reporting period for all providers for 2015. Because of the switch from federal fiscal to calendar year reporting, hospitals may use any 90-day period between October 1, 2014, and December 31, 2015, for purposes of its 2015 meaningful use attestation. Eligible professionals (primarily physicians) may use any 90-day period between January 1, 2015, and December 31, 2015.
3. Effective with 2015, the reporting period for hospitals is switching from the federal fiscal year (October 1 to September 30) to the calendar year.
4. Effective with 2015, all hospitals and eligible professionals will have to satisfy “modified Stage 2” requirements. The concept of Stage 1 and Stage 2 (unmodified) is eliminated.
5. Not succumbing to huge pressure from the industry and some lawmakers, Stage 3 was not delayed. It is available optionally in 2017 and is required in 2018.

The Office of National Coordinator for Health Information Technology (ONC) is concurrently publishing its related final rule for 2015 Edition Health IT Certification Criteria (2015 Edition). That rule, according to ONC, focuses on increasing interoperability and improving transparency and competition in the health IT marketplace.

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