In May 2020, the Centers for Medicare & Medicaid Services (CMS) published the CMS Interoperability and Patient Access final rule that adds a new requirement in the Conditions of Participation (CoP) for hospitals. In an effort to support the care continuum, CMS will soon require hospitals to alert primary care providers (PCPs) and post-acute care providers (PACs) when patients are admitted, discharged, or transferred from the emergency department (ED) or inpatient services. CMS refers to these alerts as Patient Event Notifications.

The deadline for hospitals to comply with this new requirement is May 2, 2021.

What Arizona Hospitals Need to Know

HIE C3 Support services include:

- Alerts (also referred to as CMS Patient Event Notifications)
- CMS CoP Compliance Report
- Recruitment Collaboration

Health Current, Arizona’s health information exchange (HIE) has developed the CMS Conditions of Participation (CoP) Compliance (C3) Support services to assist hospitals in meeting the new CMS Patient Event Notifications requirement. The HIE is well positioned to serve as an intermediary to help your organization meet the new CMS requirements.

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The new alert requirements apply to hospitals (including psychiatric hospitals and critical access hospitals) that participate in Medicare or Medicaid and have an electronic system using HL7® version 2.5.1 or newer. This is typically the patient registration system, which can be a stand-alone administrative system or part of an electronic health record (EHR) system.

Hospitals with these technical capabilities must use reasonable efforts to send real-time alerts — directly or through an intermediary, such as an HIE — to the patient’s PACs and PCPs who need to receive notification of the patient’s status for treatment, care coordination or quality improvement purposes.
**HIE SUPPORT: SENDING PATIENT EVENT NOTIFICATION ALERTS**

<table>
<thead>
<tr>
<th>Trigger</th>
<th>Timing</th>
<th>Target Audience</th>
<th>Data Delivered</th>
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| ED registration (including for observation) | At the time of | The following providers that need to receive notification of the patient’s status for treatment, care coordination, or quality improvement purposes:  
- All applicable PACs  
- Any of the following practitioners and entities: The patient's established PCP practitioner or group  
  **Or**  
  Other practitioner/group identified by the patient as primarily responsible for the patient’s care | Minimum data elements:  
- Patient name  
- Sending institution (i.e., hospital)  
- Treating practitioner (i.e., attending physician)  
If permitted by applicable state and federal law, and not inconsistent with a patient's expressed privacy preferences. |
| Inpatient admission | | | |
| Discharge or transfer from the ED (including to inpatient) | Immediately prior to or at the time of | | |
| Discharge or transfer from inpatient services | | | |

Non-compliance may threaten a hospital’s certification and ability to recoup payments from Medicare and Medicaid. Therefore, it is critical that hospitals understand the updated CoP and have a plan in place to meet the technical and administrative requirements.

Health Current is here to help.

Through leveraging existing technical infrastructure between hospitals and the HIE, and expanding capabilities to engage and connect with primary care and post-acute providers, Health Current can help your organization meet the new CMS requirements.

To learn more about our C3 Support services, contact Peter Steinken, Director of Community Engagement, at peter.steinken@healthcurrent.org or 602-464-9641.

Learn more at healthcurrent.org/CMS2021