



2023 Promoting Interoperability

*** 2015 Edition Cures Update CEHRT required in 2023 ***

- October 3, 2023 is the last day your 90-day period performance can begin.
- A Group is considered Hospital Based if >75% of encounters occur in POS 19, 21, 22 or 23.
- If you qualify for exclusion criteria for any of the objectives/measures below, points will be re-weighted to another measure.

Objective	Measure	Scoring	Additional Information
Protect Patient Health Information	Security Risk Analysis (PI_PPHI_1)	Required, unscored measures	Yes or No responses.
	Annual Review of High Priority Guide of SAFER, Safety Assurance Factors for EHR Resilience Guides (PI_PPHI_2)		
e-Prescribing	e-Prescribing (PI_EP_1)	up to 10 points (N/D x 10 = points)	Must report at least 1 patient in numerator; Can qualify for exclusion if < 100 prescriptions.
	Query of Prescription Drug Monitoring Program (PDMP) (PI_EP_2) Now Mandatory	10 points	Yes or No response. Same exclusion as PI_EP_1 along with 2 other exclusions.
Provider to Patient Exchange	Provide Patients Electronic Access to Their Health Information (PI_PEA_1)	up to 25 points (N/D x 25 = points)	Must report at least 1 patient in numerator, no exclusions for this measure.
Health Information Exchange	Support Electronic Referral Loops by Sending Health Information (PI_HIE_1)	up to 15 points (N/D x 15 = points)	Must report at least 1 patient in numerator. Can qualify for exclusion if < 100 referrals/transfer of care patients sent out from the practice.
	Support Electronic Referral Loops by Receiving and Reconciling Health Information (PI_HIE_4)	up to 15 points (N/D x 15 = points)	Must report at least 1 patient in numerator. Can qualify for exclusion if < 100 incoming referral/new patients.
Health information Exchange (alternative)	Bi-Directional Data Exchange (PI_HIE_5)	30 points	Yes or No response with 3 attestation requirements. This alternate measure can be reported instead of, not combined with, the HIE measures above (HIE_1, HIE_4).
Health information Exchange (New alternative)	Enabling Exchange Under the Trusted Exchange Framework and Common Agreement (TEFCA) (PI_HIE_6)	30 points	Yes or No response with 2 attestation requirements. This alternate measure can be reported instead of, not combined with, the HIE measures above (HIE_1 & HIE_4 or HIE_5).
Public Health and Clinical Data Exchange	Immunization Registry Reporting (PI_PHCDRR_1)	25 points (report on both measures)	To be awarded full points, must be in: • Active engagement with two registries, or • Active engagement with one & excluded from one registry, or • Excluded from two registries.
	Electronic Case Reporting (PI_PHCDRR_3)		
	Public Health Registry Reporting (PI_PHCDRR_4) (Bonus)	Report on any one measure for 5 points bonus	Up to 5 points bonus if active with any of three registries; no additional points for additional participation.
	Clinical Data Registry Reporting (PI_PHCDRR_5) (Bonus)		
	Syndromic Surveillance Reporting (PI_PHCDRR_2) (Bonus)		

Promoting Interoperability (PI) MIPS Performance Category

The PI category makes up 25% of the MIPS score unless the practice has a special status which qualifies for PI reweighting, is approved for a PI hardship exemption, or is participating in an APM.

Your organization is measured on the four PI objectives, and you must submit data for a 90-day (or longer) continuous performance period during 2023. In addition to submitting data, you must also provide your EHR's CMS Certification ID from the Certified Health IT Product List (CHPL). 2015 Edition Cures Update is required.

Things to remember for Promoting Interoperability (PI) in 2023

- Certain provider types (NP, PA, CRNA and CNS) are no longer exempt so they must report PI, unless they qualify for another exemption.
- For MIPS 2023, you must have the updated functionality for your 2015 Edition Cures Update CEHRT in place by the 1st day of your 2023 reporting period and your EHR must be Certified by the last day of your reporting period.
- Conducting High Priority Practices Guide, which is one of the 7 Safety Assurance Factors for EHR Resilience (SAFER) Guides, is in addition to the Security Risk Analysis, which is still required.
- Query of PDMP measure is now mandatory; worth 10 points.
- New alternate HIE measure, Enabling Exchange under TECFA.
- When reporting registry measures, CMS has changed the levels of active engagement and requires providers to identify level when reporting on the measures.
- Scoring points have been redistributed to the different measures.

Promoting Interoperability (PI) Hardship Exemption

If you anticipate being unable to meet PI requirements, you may submit a PI Hardship Exemption Application, citing one of the following reasons for review and approval:

- MIPS eligible clinician in a small practice (still automatic, no need to apply if you are considered a small practice)
- MIPS eligible clinician using decertified EHR technology
- Insufficient internet connectivity
- Extreme and uncontrollable circumstances
- Lack of control over the availability of CEHRT

Applications for exemptions open in the summer and must be submitted by December 31. Practices participating in MIPS as a group should closely review the status of the group and/or each provider to determine your PI reporting options. Your Mingle Health MIPS consultant can help you with this!

Further Reading & Additional Resources

[Video: The Mingle Health Guide to the 2023 Final Rule](#)

[CMS Hardship Exemption Information](#)

[Certified Health IT Product List \(CHPL\)](#)