

2024 Promoting Interoperability

Please note: In the 2024 Final Rule, CMS increased the reporting period for PI from 90 days to 180 days.

July 5, 2024 is the last day your 180 day reporting period can begin.

- CMS also modified CEHRT requirements to reflect ONC regulations. ONC has proposed to move away from "Editions" and implement base criteria for CEHRT requirements, with periodic updates.
- 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	New for 2024, a Yes response is mandatory for both the Security Risk Analysis and Safer Guide.
	Annual Review of High Priority Guide of SAFER, Safety Assurance Factors for EHR Resilience Guides (PI_PPHI_2) (NOW MANDATORY)		
e-Prescribing	e-Prescribing (PI_EP_1)	up to 10 points (N/D x 10 = points)	Must report number of prescriptions in denominator generated/transmitted with CEHRT. Can qualify for exclusion if unable or does not electronically prescribe Schedule II opioids or Schedule III or IV drugs.
	Query of Prescription Drug Monitoring Program (PDMP) (PI_EP_2)	10 points	Yes or No response. Mandatory, with new updated exclusions for 2024.
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 (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)	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)		
	Syndromic Surveillance Reporting (PI_PHCDRR_2)		

Promoting Interoperability (PI) MIPS Performance Category:

The PI category makes up 25% of your MIPS score unless your 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 180-day (or longer) continuous performance period during 2024. 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.

Details to remember for Promoting Interoperability (PI) in 2024:

- In the 2024 Final Rule, CMS increased the reporting period for Promoting Interoperability from 90 days to 180 days. July 5, 2024 is the last day your 180 day reporting period can begin.
- Clinical Social Workers are now the only provider types who qualify for an automatic exemption from Promoting Interoperability.
- You must have the updated functionality for your 2015 Edition Cures Update CEHRT in place by the 1st day of your 2024 reporting period and your EHR must be certified by the last day of your reporting period.
- Query of PDMP measure is still mandatory but there are updated exclusions, including:
 - Any MIPS eligible clinician who is:
 - 1. Unable to electronically prescribe Schedule II opioids and Schedule III and IV drugs in accordance with applicable law during the performance period; or
 - 2. Any MIPS eligible clinician who does not electronically prescribe any Schedule II opioids or Schedule III or IV drugs during the performance period.

Further Reading & Additional Resources

[Video: The Mingle Health Guide to the 2024 Final Rule](#)

[CMS Hardship Exemption Information](#)

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

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!



Your Partner in MIPS & Value-Based Care

Your Mingle Health MIPS Consultant will help you plan for success and address issues that may arise throughout the year. We encourage you to engage your team and stakeholders early to understand your specific needs and improve your performance.

Please bookmark our [MIPS Success Guide](#) and remember you can always email us at hello@minglehealth.com with your questions.