

How Dermatology Offices Can Comply with the CMS Meaningful Use Rule

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On August 12, 2012, the Centers for Medicare and Medicaid Services (CMS) issued a final rule for the Medicare and Medicaid Electronic Health Record (EHR) Incentive Programs. A key provision of this final rule is that only “credentialed medical assistants” (in addition to licensed health care professionals) are permitted to enter medication, laboratory, and radiology orders into the Computerized Provider Order Entry (CPOE) system and have such entry count toward meeting the meaningful use requirements under the Incentive Programs. Questions have arisen about how dermatology offices (and the offices of other medical specialties) can comply with the order entry requirements and receive incentive payments.

First of all, for all reporting periods in 2013 and subsequent years, and for Stages 1 and 2 of the Incentive Programs, eligible professionals (such as dermatologists) must ensure that a certain percentage of all medication, laboratory, and radiology orders are recorded by computerized provider order entry. Secondly, for these electronically-entered orders to count toward meeting the required percentages, they must be entered by either licensed health care professionals or credentialed medical assistants. Entry of orders by unlicensed personnel or non-credentialed medical assistants will not be counted in determining whether a provider has met the required percentages.

After the August 12, 2012, final rule was published in the Federal Register, CMS started receiving questions from specialists who were wondering how narrowly CMS was interpreting the category of “credentialed medical assistants.” Specialists were concerned because their employees sometimes carried titles that did not include the words “medical assistant.” In response to these inquiries, CMS issued the following Frequently Asked Question (FAQ), which is available on the CMS website:

When meeting the meaningful use measure for computerized provider order entry (CPOE) in the Electronic Health Record (EHR) Incentive Programs, does an individual need to have the job title of medical assistant in order to use the CPOE function of Certified EHR Technology (CEHRT) for the entry to count toward the measure, or can they have other titles as long as their job functions are those of medical assistants?

If a staff member of the eligible provider is appropriately credentialed and performs similar assistive services as a medical assistant but carries a more specific title due to either specialization of their duties or to the specialty of the medical professional they assist, he or she can use the CPOE function of CEHRT and have it count towards the measure. This determination must be made by the eligible provider based on individual workflow and the duties performed by the staff member in question. Whether a staff member carries the title of medical assistant or another job title, he or she must be credentialed to perform the medical assistant services by an organization other than the employing organization. Also, each provider must evaluate his or her own ordering workflow, including the use of CPOE, to ensure compliance with all applicable federal, state, and local law and professional guidelines. Created: 08/20/2013 (FAQ9058)

There are three central points that dermatology office managers must keep in mind in applying this CMS FAQ to their practice environment.

1. Staff members in dermatology practices must be “appropriately credentialed” and perform “similar assistive services as a medical assistant,” regardless of their official title. A credential is “appropriate” if it measures the knowledge needed to enter medication, laboratory, and radiology orders into the

Computerized Provider Order Entry (CPOE) system, and to respond knowledgeably to any clinical decision support alerts that the Electronic Health Record system generates.

2. The credential must be awarded “by an organization other than the employing organization.” In other words, the credential must be awarded by a “third party,” and not by the office, clinic, or health system that is employing the staff member. For example, certification examinations administered by accredited testing bodies such as the Certifying Board of the American Association of Medical Assistants (AAMA), which awards the “Certified Medical Assistant (CMA) (AAMA)” credential, or American Medical Technologists (AMT), which awards the “Registered Medical Assistant (RMA)(AMT)” designation, fall within the CMS definition of a third-party.

3. Finally, the determination of whether a credentialed employee falls within the parameters of the CMS FAQ “must be made by the eligible provider based on workflow and the duties performed by the staff member in question.” Dermatology practices would be well advised, therefore, to document in writing the tasks and responsibilities assigned to personnel who enter orders into the CPOE system, and why the dermatologist is of the opinion that these individuals fall within the parameters of CMS FAQ9058.

Any questions about this article or the CMS requirement of order entry by credentialed medical assistants or licensed health care professionals may be submitted to the author at dbalasa@aama-ntl.org.

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