



Hospital Condition of Participation (CoP)

CMS Interoperability and Patient Access Final Rule

Agenda

- **Introductions and Background**
- **Condition of Participation (CoP)
Hospital Notification Requirement**
- **GA Notify Technical Overview**
- **How GA Notify Complies with CoP**
- **Summary / Next Steps / Q&A**



Meet the Audacious Inquiry Team



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GA Notify Program Background

House Bill 683 FY2018 Amended Budget

- State Office of Rural Health (SORH) grant
- Encourage health systems or primary care providers to purchase data analytic or electronic/digital population health tools to improve health outcomes in rural Georgia

Georgia Discharge Data System (GDDS)

Vendor Selection

- Evaluation Committee, Request for Proposals, Contracting

Audacious Inquiry Partnership



National Leader in Connected Care

- National leader in encounter notification and event-driven clinical data exchange
- Trusted partner to ONC, HIEs, Hospital Associations, and State Medicaid across 16 states
- Over **30M+** encounter notifications sent per month to Payers, Health Systems, Physicians, Public Health Agencies, Care Managers, Post-Acute Facilities and other clinicians



What is GA Notify?



- Powered by Ai's **Encounter Notification Service**
- High quality, dense network across the state of Georgia
- GA Notify can notify subscribing organizations in **real-time** when attributed patients provided via panel have encounters at any participating facilities
- **Use this information to:**
 - Schedule post-discharge follow-up visits for transitional care management
 - Increase patient engagement
 - Reach out to admitting facilities to convey existing treatment relationship
 - Prevent potentially avoidable hospital readmissions
 - Reduce the total cost of care

CMS Hospital Condition of Participation (CoP) E-Notification Requirement



Hospital Notification Requirement

As a condition of participation (CoP) in Medicare and Medicaid, electronic notifications must be sent to certain providers/groups that have an established relationship with the patient.

Who this affects:

- Hospitals
- Psychiatric hospitals
- Critical access hospitals

When:

- Starting May 2021

Hospital Notification Requirement

Hospitals must make a “reasonable effort” of sending notifications for the following:

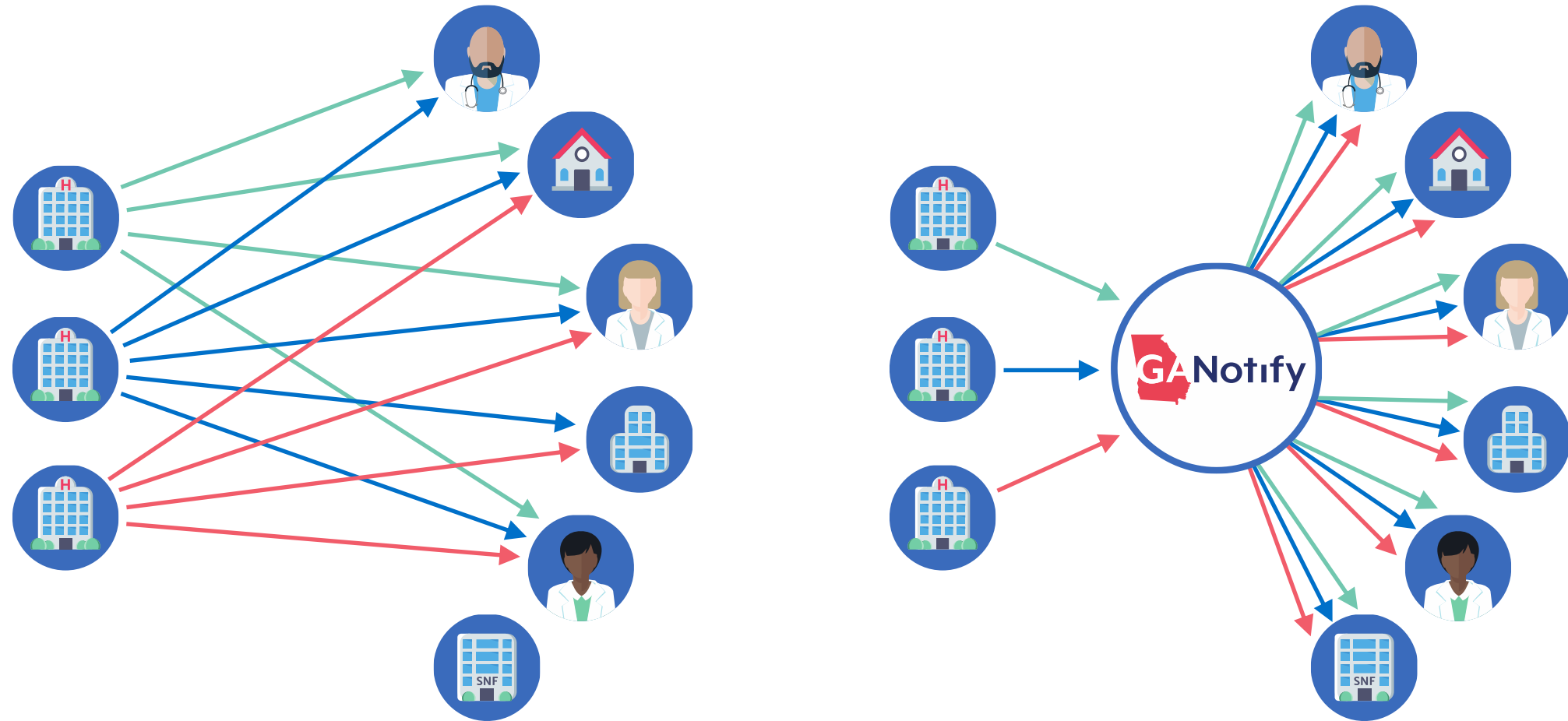
Type of Events:	<ul style="list-style-type: none">• Inpatient, emergency department, or observation• Admission, discharge, and transfer
Recipients:	<ul style="list-style-type: none">• The patient’s established PCP/group• The patient’s established post-acute care providers and suppliers• Any provider that the patient identifies as primarily responsible for his or her care
Reason:	<ul style="list-style-type: none">• Treatment, care coordination, or quality improvement
Covers:	<ul style="list-style-type: none">• <u>All patients</u> (not just Medicare or Medicaid patients)
Must Include:	<ul style="list-style-type: none">• The name of the patient• The name of the treating provider• The name of the sending institution

Hospital Notification Requirement: Enforcement

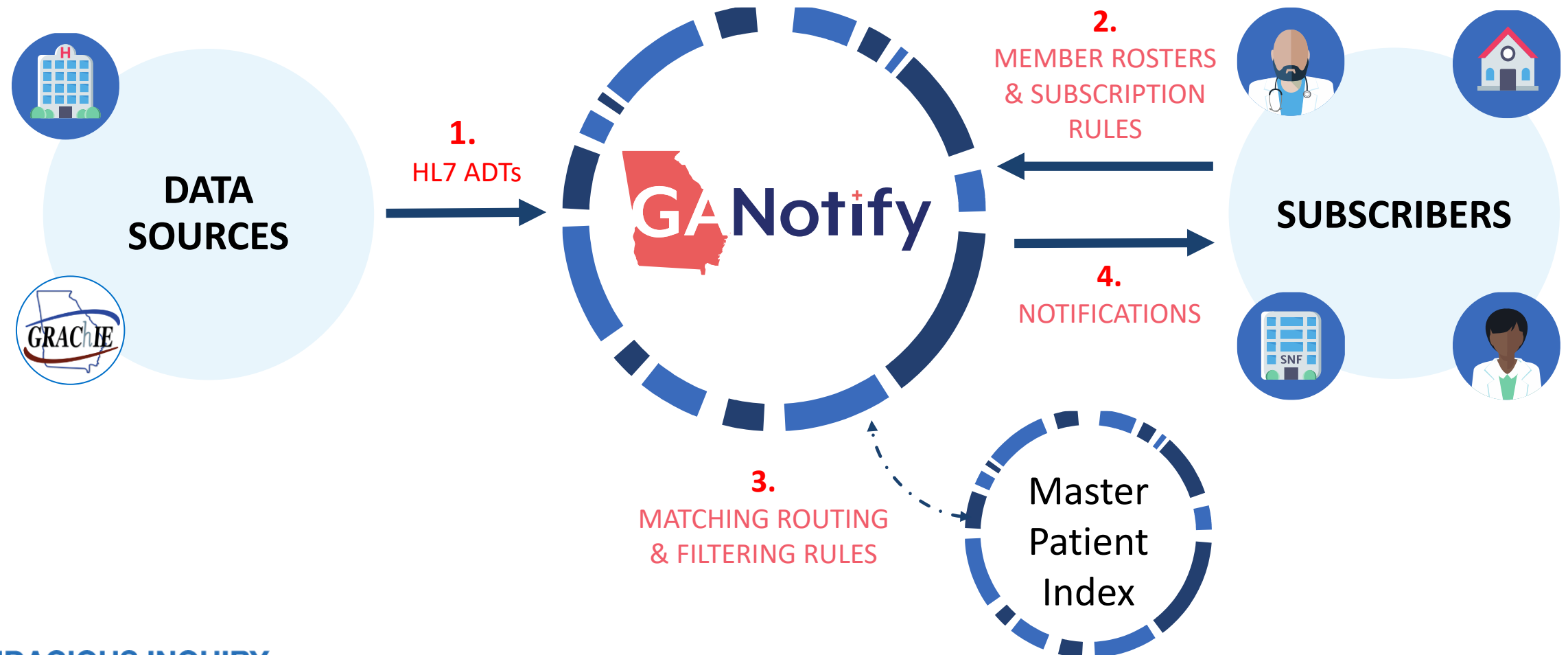
- The notification requirement will be enforced through the survey and certification process
- CMS anticipates surveyors would utilize basic and effective survey procedures and methods
 - Review of the organizational structure and policy statements
 - Review of a sample medical records
 - Interview of medical records and other hospital staff
 - Conducting observations with medical records staff and leadership



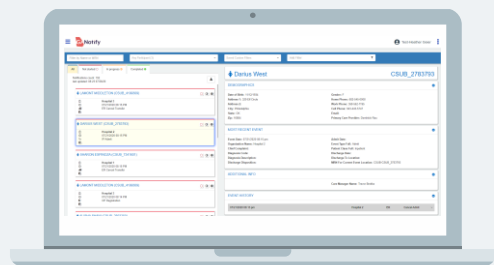
Hospital Notification Requirement: Intermediary



GA Notify Overview



GA Notify Overview – Notification Delivery



Web Portal



Email Alerts



Industry-leading standards



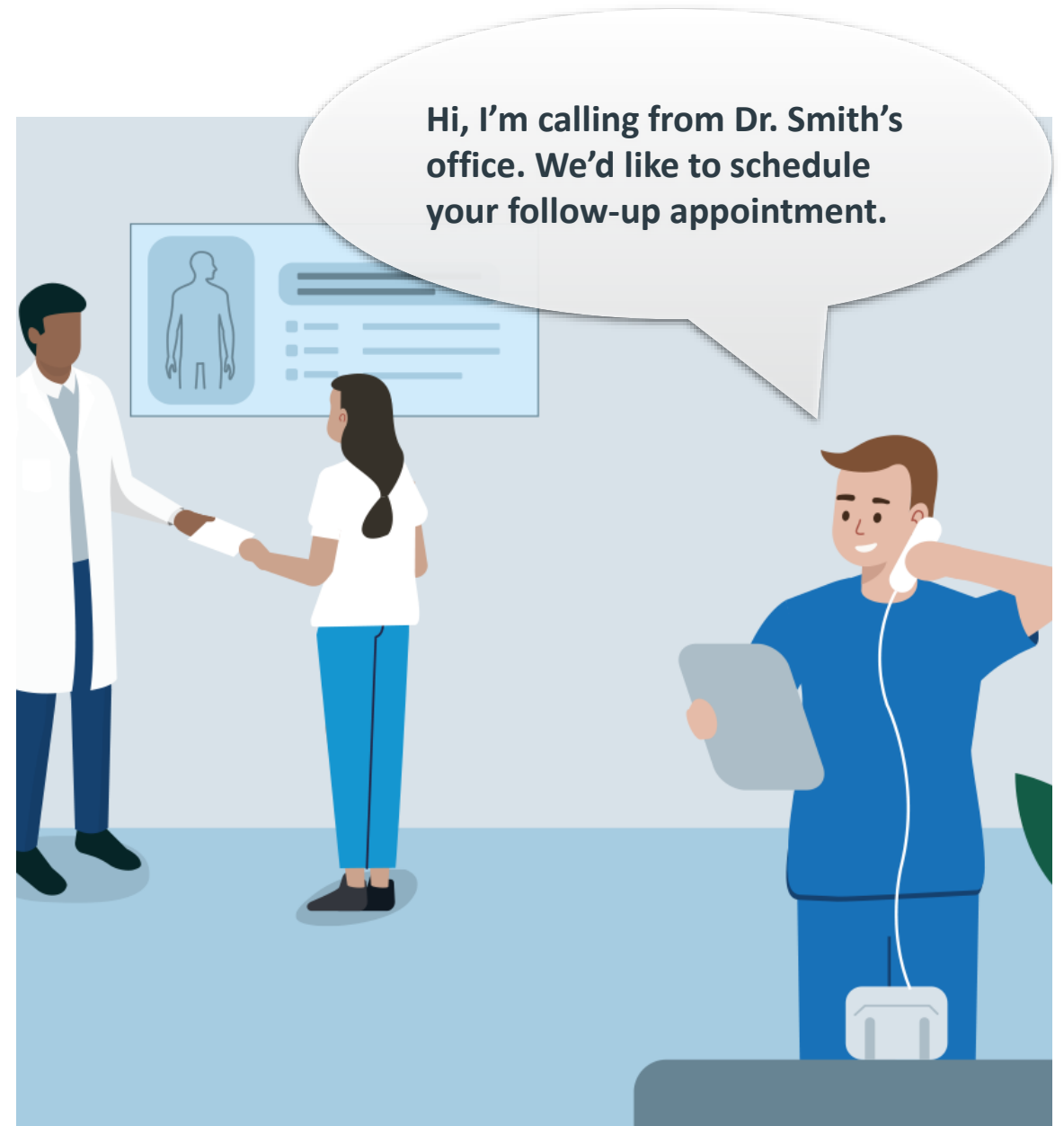
Direct Message



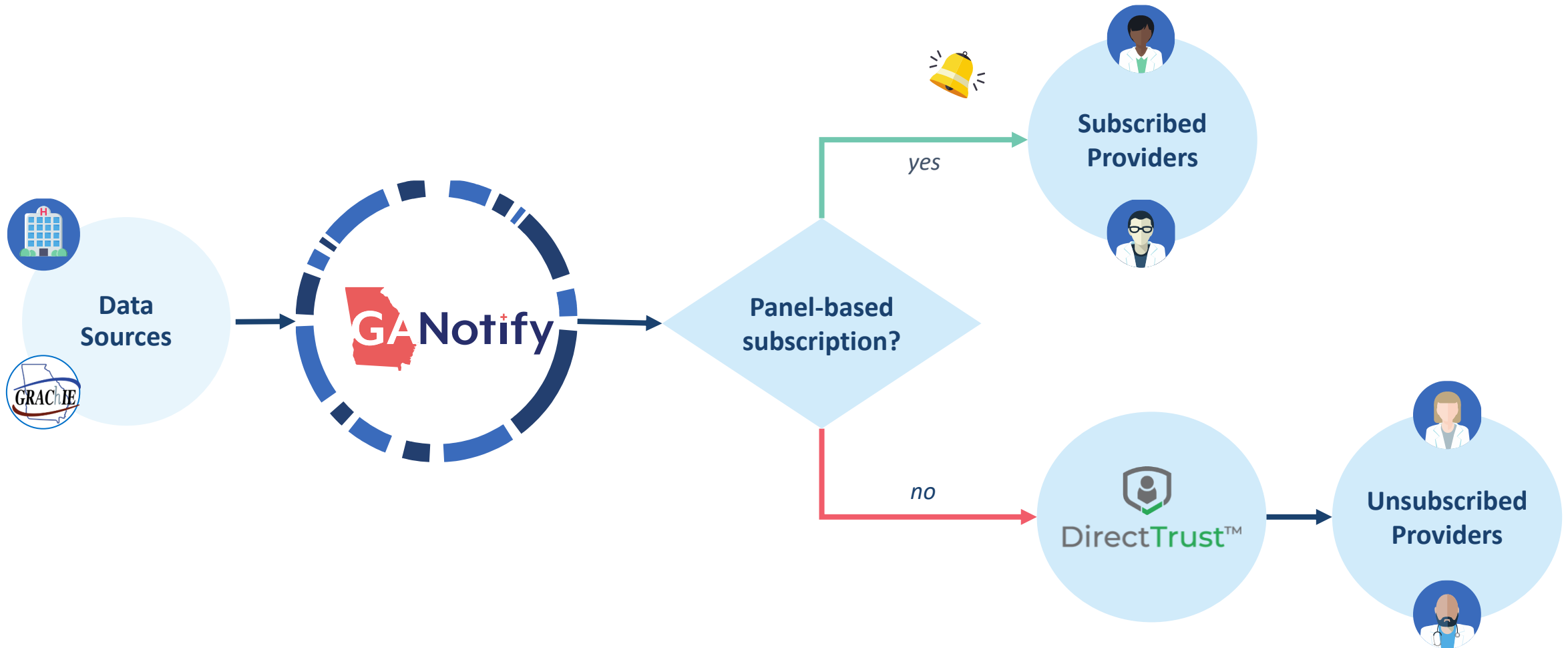
CSV

GA Notify Enhancements for CoP Notification Compliance

Supporting Patient Assertion

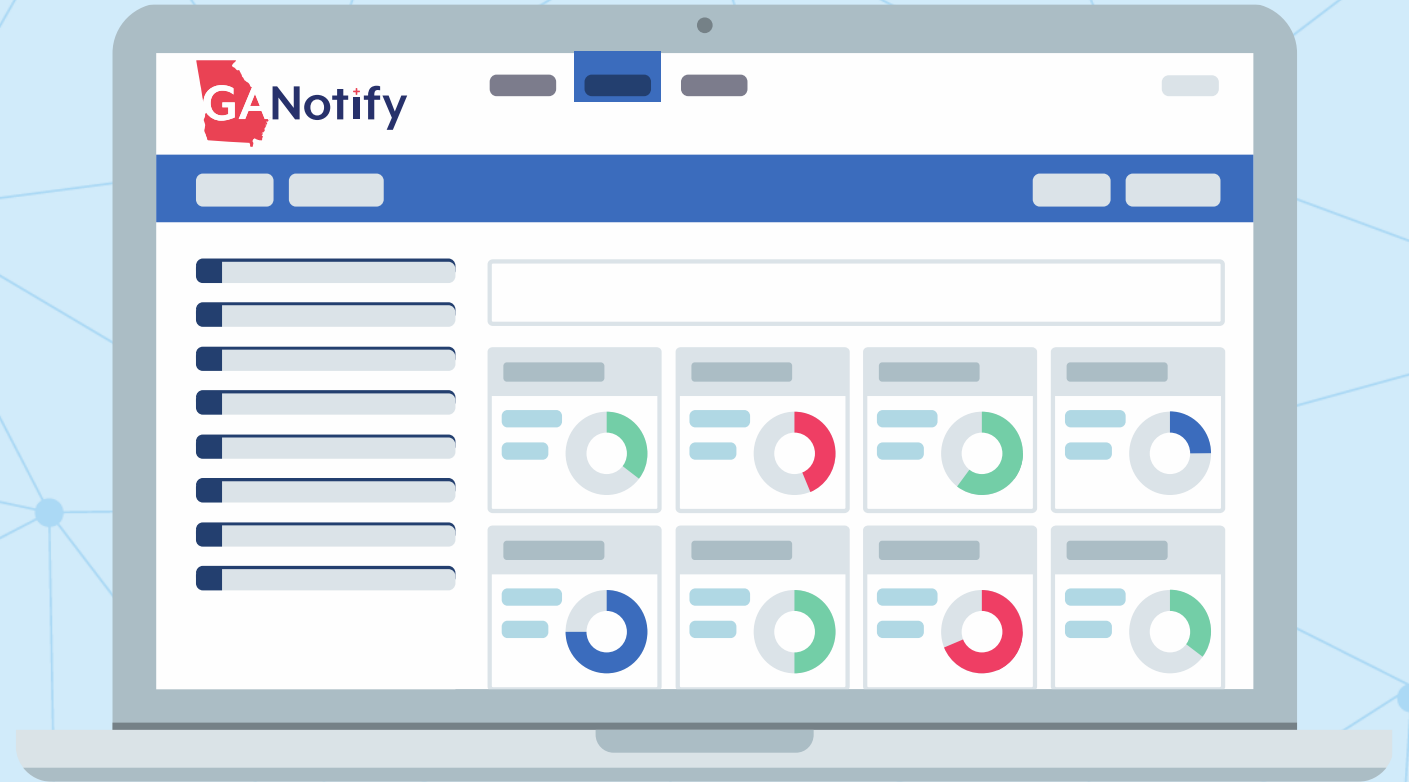


GA Notify Workflow



GA Notify's CMS Audit Report

- GA Notify will supply an Audit report that your hospital may provide to a CMS surveyor demonstrating how your organization complies.












Looking Beyond CoP Compliance

- Continued network growth
- Driving scaled intelligent alert delivery across the care continuum
 - PCPs
 - Specialists (Cardiology, Oncology)
 - Post-acute providers
- Enhanced data quality monitoring and availability



How GA Notify Meets CoP Requirements

Condition of Participation Requirement	Technical		Non-Technical	
	GA Notify	Hospital's EMR	Hospital's Policies & Procedures	Ai Support
System is: <ul style="list-style-type: none"> Fully operational In accordance with all state and federal statutes/regulations regarding the exchange of patient health information 	 HITRUST CSF certified	 Compliant		
Notification Events: <ul style="list-style-type: none"> Admission Discharge Transfer 	 Ingest ADTs & pull out appropriate events	 Send all ADTs to GA Notify		
Notification Settings: <ul style="list-style-type: none"> Inpatient Emergency Department Observation 	 Ingest ADTs & pull out appropriate settings	 Send all ADTs with standardized fields to GA Notify		 Recommendation for standardized HL7 observation field
Notification Timing: <ul style="list-style-type: none"> At the time of admission / registration Either immediately prior to, or at the time of discharge or transfer 	 Send notifications near real-time	 Send all ADTs to GA Notify immediately upon generation		

How GA Notify Meets CoP Requirements

Condition of Participation Requirement	Technical		Non-Technical	
	GA Notify	Hospital's EMR	Hospital's Policies & Procedures	Ai Support
Minimum Notification Content: <ul style="list-style-type: none"> • Name of the patient • Name of the treating provider • Name of the sending institution 	✓ Notification includes fields	✓ ADT feed includes fields	✓ Workflow includes all notification content field documentation	✓ Recommendations for considerations to workflows & standardized HL7 fields
Notification Recipients: <ul style="list-style-type: none"> • PCP/primary care group • Post-acute care providers and supplier • Patient asserted provider/group 	✓ Send notifications to all necessary recipients	✓ Include in ADTs any documented recipients	✓ Workflow includes all recipient data capture	✓ Recommendations for considerations to workflows & standardized HL7 fields
Patient's expressed privacy preferences	✓ Preferences recorded at patient-level		✓ Procedure to document patient's preference	✓ Recommendation for process to capture patient preference
Demonstrating compliance through the survey and certification process	✓ Audit reports, ADT analysis, & hospital admin interface		✓ Update written policies & procedures and train staff	✓ Provide common workflows and implementation policies & procedures

How do I get started?

Interested in Becoming a Participating Member in GA Notify?

- Email us at GANotify@gha.org to get started!
 1. Sign GDDS Addendum and Kickoff call
 2. Establish connectivity and build interface (technical)
 3. Achieve CoP compliance!

Current Participating Member in GA Notify:

- No action needed!
 1. GA Notify team will follow-up with identified gaps and necessary ADT feed updates for CoP required fields

Summary

GA Notify participation and CoP compliance is free

- Included with participation in GDDS
- Oversight and protection through GHA's data and technology committee

We are building the most robust network in the state

- Network density, high fidelity matching, strong data quality
- Real-time notifications to support value-based care needs
- Intelligent alert delivery for deep workflow integration



Questions & Answers



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