
The CMS Rule for Meaningful Use Order Entry

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Who can enter orders into
the EHR for meeting the
Stage 1 and 2 measures?



- **Stage 1 final rule**
 - Only “licensed health care professionals” allowed to enter orders
- **August 23, 2012 final rule**
 - “Credentialed medical assistants” also allowed to enter orders



How does CMS define “credentialed medical assistants”?



- Credentialing must come from outside the organization of employment
- Clinics, health systems cannot grant “credentials” to medical assistants



When does the CMS final rule allowing credentialed medical assistants to enter orders into the CPOE go into effect?



- CMS rule is in effect for reporting periods in 2013
- Incorrect to assert that the CMS rule does not go into effect until 2014



Does the CMS final rule
only apply to entry of
orders under Stage 2 of
the Incentive Programs?



- CMS FAQ 7693
 - Final rule applies to all stages of Medicare and Medicaid Incentive Programs
 - Stage 1, Stage 2, Stage 3 (when in effect)



Will CMS enforce the
“credentialed medical
assistant” requirement?



- EHRs can keep track of who makes each entry
 - Auditors can access entry logs
 - If entries are not made by licensed health care professionals or credentialed medical assistants, the EP may be ineligible to receive incentive payments



Questions?

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