

2023 Merit-based Incentive Payment System (MIPS) Promoting Interoperability Performance Category: High Priority Practices SAFER Guide Fact Sheet

Overview

To increase safety and use of electronic health records (EHRs), the Quality Payment Program added a new Promoting Interoperability measure to the Protect Patient Health Information objective that started with Calendar Year 2022. This required, but unscored measure is called the **High Priority Practices Safety Assurance Factors for EHR Resilience (SAFER) Guide** measure. The High Priority Practices SAFER Guide helps healthcare organizations evaluate their EHR safety practices, identify and prioritize potential risks, and establish a plan to mitigate EHR-related safety concerns. This Guide broadly addresses the EHR safety concerns discussed in greater detail in the other eight SAFER Guides. We believe that conducting an annual self-assessment starting with the High Priority Practices SAFER Guide will support consistent safety practices for all EHR users and further enable the electronic exchange of health information.

What Are SAFER Guides?

The Office of the National Coordinator for Health Information Technology (ONC) developed the [SAFER Guides](#) with the goal of increasing safety and use of EHRs. The Guides are a set of self-assessment tools that aim to help healthcare organizations evaluate their EHR safety practices, identify potential risks, and mitigate those risks. Each Guide includes a self-assessment checklist, action-based worksheets, and recommended practices that are designed to help your organization reduce EHR-related patient safety risk, optimize safe use of EHRs, and create a “culture of safety.” The Guides are presented in an interactive PDF format with bookmarks, links, and drop-down list functions that make it easy to use, share, collaborate on, and make a fresh copy for a later assessment.

Do I Have to Attest?

If you’re a MIPS eligible clinician who reports on the Promoting Interoperability performance category, you **must** attest to the High Priority Practices SAFER Guide measure.



If you're reporting as a group, the group **must** attest to the High Priority Practices SAFER Guide measure. The group's response to the High Priority Practices SAFER Guide measure applies to all MIPS eligible clinicians within the group.

What Actions Are Required?

If you want to earn a score **greater than 0** for the Promoting Interoperability performance category, you must attest either YES or NO to completing the self-assessment checklist and the recommended practice worksheets in the [High Priority Practices SAFER Guide \(PDF\)](#). Reporting YES or NO won't affect the total number of points earned for the Promoting Interoperability performance category. However, leaving the High Priority Practices SAFER Guide measure attestation **blank (N/A, --)** will result in a **score of 0** for the Promoting Interoperability performance category because a YES or NO response is required to satisfy the measure requirements and earn a Promoting Interoperability performance category score.

Helpful Hint: Assembling a multi-disciplinary safety team is recommended to complete this Guide, as a team will be best equipped to identify which EHR-related safety practices should be addressed first and which of the other SAFER Guides to turn to next.

To attest **YES** to the High Priority Practices SAFER Guide measure, you must complete the following items annually:

<p>Fill out the self-assessment checklist found on pages 5 – 6 of the Guide</p>	<p>You must select the level of implementation achieved by your organization for each recommended practice by selecting one of the following implementation statuses:</p> <ul style="list-style-type: none"> • Fully in all areas • Partially in some areas • Not implemented
<p>Fill out the recommended practice worksheets (1.1 – 3.3) on pages 9 – 26 of the Guide</p>	<p>You must create an implementation plan for the recommended safety practice by completing the following fields on the worksheets:</p> <ul style="list-style-type: none"> • Add assessment notes (identified risks, list of questions, possible action items/steps the organization can take to improve EHR safety practices) • Identify follow-up actions/steps you and your team will take to implement the recommended safety practice • Assign a point person or team who is responsible for the follow-up action



	Each recommended practice worksheet includes information to help you establish an implementation plan for the recommended practice.
You will attest NO to the High Priority Practices SAFER Guide measure if:	
You're unable to complete the self-assessment checklist and recommended practice worksheets. Please note that attesting NO satisfies the measure requirements and won't result in a score of 0 for the Promoting Interoperability performance category.	

What Am I Attesting to?

The High Priority Practices SAFER Guide measure further enables the electronic exchange of health information to improve quality of healthcare, such as promoting care coordination, as described in section 1848(o)(2)(A)(II) of the Act.

High Priority Practices SAFER Guide Attestation Statement:
I completed the actions included in the SAFER Guides measure during the calendar year in which the performance period occurs.

When you attest to this statement, you are confirming that you:

- **Have** conducted the annual self-assessment and completed the practice worksheets in the High Priority Practices Guide (YES response).
- OR**
- **Haven't** conducted the annual self-assessment and completed the practice worksheets in the High Priority Practices Guide (NO response).

We understand that every organization faces unique circumstances and will implement a particular practice differently. As a result, some of the specific examples in the SAFER Guides for recommended practices may not be applicable to every organization. A self-assessment doesn't require an organization to confirm that it has implemented "fully in all areas" each practice described in the High Priority Practices SAFER Guide, nor will an organization be scored on how many of the recommended practices the organization has fully implemented. The intent is for MIPS eligible clinicians to regularly assess their progress and status on EHR-related patient safety.



Do I have to Show Any Documentation to Attest?

You don't have to give us any documentation to show you've completed the checklist or associated recommended practice worksheets in the High Priority Practices SAFER Guide. By attesting YES, you're acting in good faith to completing the measure requirements.

What are the Other Promoting Interoperability Requirements?

In addition to the High Priority Practices SAFER Guide measure attestation, you must meet these requirements to earn a score greater than 0 in the Promoting Interoperability performance category:

- Use 2015 Edition Cures Update CEHRT
- Provide your EHR's CMS identification code from the [Certified Health IT Product List \(CHPL\)](#)
- Submit performance data for a minimum of a continuous 90-day performance period
- Meet all of the required measures or qualify and claim exclusions
- Submit a "yes" to the Actions to Limit or Restrict Compatibility or Interoperability of CEHRT Attestation
- Submit a "yes" that you've completed the Security Risk Analysis measure during the calendar year in which the performance period occurs
- Attest to work in good faith with ONC, if you get a request from ONC to assist in its review of potential non-conformities in health information technology

You can also choose to attest to work in good faith with an ONC-ACB surveillance of your health information technology if it is certified under the ONC Health IT Certification Program. You have this option if you get a request for surveillance.

Where Can You Go for Help?

- Contact the Quality Payment Program Service Center by email at QPP@cms.hhs.gov, create a [QPP Service Center ticket](#), or by phone at 1-866-288-8292 (Monday through Friday 8 a.m. – 8 p.m. ET). To receive assistance more quickly, please consider calling during non-peak hours—before 10 a.m. and after 2 p.m. ET.
 - Customers who are hearing impaired can dial 711 to be connected to a TRS Communications Assistant.
- Visit the [Quality Payment Program website](#) for other [help and support](#) information, to learn more about [MIPS](#), and to check out the resources available in the [Quality Payment Program Resource Library](#).

Additional Resources

The [Quality Payment Program Resource Library](#) houses fact sheets, specialty guides, technical guides, user guides, helpful videos, and more.

Resource	Description
2023 MIPS Promoting Interoperability Performance Category Quick Start Guide	A high-level overview and practical information about data collection and submission for the 2023 MIPS Promoting Interoperability performance category.
2023 MIPS Promoting Interoperability User Guide (available in the Quality Payment Program Resource Library in Spring 2023)	A guide to help clinicians participating in the MIPS Promoting Interoperability performance category during the 2023 performance period.
2023 MIPS Promoting Interoperability Measure Specifications	Provides a detailed overview of the requirements for the 2023 Promoting Interoperability performance category objectives and measures.

Version History

If we need to update this document, changes will be identified here.

Date	Change Description
01/26/2023	Original posting.