

Assessment of Timing Options

1. Maintain current timeline and one-year EHR reporting period; or
2. Maintain current timeline and permit 90-day EHR reporting period; or
3. Delay transition from stage 1 to stage 2 by one year (providers could get third-year payment for meeting stage 1 expectations); or
4. Phase-in approach that separates existing from new functionalities
 - a. 2013: Updated stage 1 requirements (“Stage 1 Prime”) with no new EHR functionality (e.g., move menu set items to core and increasing thresholds of existing stage 1 functionality measures)
 - b. 2014: Stage 2 objectives requiring new EHR functionalities would not be expected to be implemented until FY 2014

Impact of Timing Option on:	Option 1	Option 2	Option 3	Option 4
Establishment of infrastructure for delivery system reform	++	0	--	--
Maintaining MU momentum up escalator	++	-	--	-
Vendor development timeline (new functionality)	--	-	++	++
Provider implementation timeline	--	0	++	++
Need for provider to perform annual upgrades*	-	-	0	--
ICD-10 synergy	-	-	+	+
CMS & states’ program operational complexity	0	-	0	--
CQM measurement & reporting	0	-	0	0

- Need to change certification-by-year policy to avoid annual upgrade issue. Rating in matrix assumes change of certification to certification by stage

++ = implementing this option strongly supports this attribute

+ = implementing this option supports this attribute

0 = implementing this option has relatively no impact on this attribute

- = implementing this option negatively impacts this attribute

-- = implementing this option has a significant negative impact on this attribute

TABLE 1—STAGE OF MEANINGFUL USE CRITERIA BY PAYMENT YEAR

First Payment Year	Payment Year			
	2011	2012	2013	2014
2011	Stage 1	Stage 1	Stage 2	Stage 2.
2012	Stage 1	Stage 1	Stage 2.
2013	Stage 1	Stage 1.
2014	Stage 1.
	Complete EHRs and EHR Modules certified by ONC–ATCBs or ONC–ACBs ² to all of the applicable certification criteria adopted for the 2011 & 2012 payment years meet the definition of Certified EHR Technology.		Complete EHRs and EHR Modules certified by ONC–ACBs to all of the applicable certification criteria adopted for the 2013 & 2014 payment years meet the definition of Certified EHR Technology.	