



**Center for Medicare & Medicaid Services (CMS)  
Conditions of Participation (CoP)  
for Admissions, Discharge, and Transfer (ADT) Messages**

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## What are the Conditions of Participation (CoP)?

- **Derived from Center for Medicare & Medicaid Services (CMS) “Patient Access” Rule**
- **Addresses ADT Requirement on hospitals, psychiatric hospitals, and critical access hospitals**
- **Lays out minimum requirements for content and manner**

# MiHIN Involvement

## What is our understanding of the CoPs?

### Comprehensive Analysis

- ✓ Reviewed the CoPs in detail earlier this year
- ✓ Compared the requirements to our ADT Use Case
- ✓ Reviewed guidance on ambiguity in language from CMS itself
- ✓ Determined how we could best support our stakeholders in State of Michigan
- ✓ Determined how to meet, facilitate interstate sharing
- ✓ Participated in national dialogue to determine how others are addressing



## CoP Requirements

# ADTs

### Who does it apply to?

Hospitals  
Psychiatric Hospitals  
Critical Access Hospitals

Only hospitals that possess EHR system with capacity to generate the basic patient personal or demographic information for information for electronic patient event notifications

## CoP Requirements

# ADTs

### Basic Hospital Requirements

1. Fully operational + compliant with federal statutes for health information
2. Utilizes content exchange standard
3. Sends notifications that would have to include minimum patient information (next slide)
4. Sends notifications directly to through an intermediary that facilitates exchange of health information at the time of admission or immediately prior to or at time of discharge

## CoP Requirements

# ADTs

### What Information Must Be Sent in ADT?

Minimum patient information

1. Patient's basic personal or demographic information
2. Name of the sending institution
3. the patient's diagnosis (if not prohibited by law)

## CoP Requirements

# ADTs

### How must information be sent?

Hospital must demonstrate that the system sends notifications directly, or through an intermediary that facilitates exchange of health information, at the time of the patient's hospital ADT to licensed and qualified practitioners, other patient care team members, and PAC services providers and suppliers that:

1. Receive the notification for treatment, care coordination, or quality improvement purposes;
2. Have an established care relationship with the patient relevant to his or her care
3. The hospital has reasonable certainty that such notifications are received.

## CoP Requirements

# ADTs

### Who must you send to?

Only send if reasonable certainty of receipt. Reasonable certainty means hospital made a reasonable effort to ensure that” the system sends the notifications to any of the following that need to receive notification of the patient’s status for treatment, care coordination, or quality improvement purposes to all applicable post-acute care services providers and suppliers and:

- (1) The patient’s established primary care practitioner;
- (2) the patient’s established primary care practice group or entity; or
- (3) or other practice group or entity, identified by the patient as the practitioner, or practice group or entity, primarily responsible for his or her care.



# MiHIN Involvement and Support

## Hospital Support

Participation in ADT Use Case

Connection to “intermediary” like HIN

Better understanding of requirements





Thank you!

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