Washington State EHR Incentive Program

White Paper #13: 2019 Objective 5 - Patient Electronic access to Health Information Clarification

2019 Spec sheet (objectives and measures)

Opting out of the patient portal:

If a provider's CEHRT requires a patient email address, but the patient does not have or refuses to provide an email address or elects to "opt out" of participation, the provider may still meet the measure by providing the patient with all of the necessary information required for the patient to subsequently access their information, obtain access through a patient-authorized representative, or otherwise opt-back-in without further follow up action required by the provider. We note that we have proposed no changes to the timeframe for provision of new information and maintain that 36 hours (for eligible hospitals and CAHs) and 4 business days (for EPs) is a reasonable time limit because it allows for immediate access (if feasible) and a reasonable amount of time for providers to review any information necessary before it is made available to the patient.

View Final Rule here

Further Clarification

Please note, patients who opt out of participation should still be counted in the denominator and providers may still meet the measure by 'providing access'. Don't be confused with 'providing access' with the actual 'provision of information'. Provide Access is defined in the tip sheet as "When a patient **possesses all of the necessary information** needed to view, download, or transmit their information. This could include providing patients with instructions on how to access their health information, the website address they must visit for online access, a unique and registered username or password, instructions on how to create a login, or any other instructions, tools, or materials that patients need in order to view, download, or transmit their information."

Many EHRs have an "Opt Out" tracking method, but if yours does not, you may track it manually thru records, spreadsheets; etc, in case of an audit. Please remember to only count "unique" patients, meaning that patient can only be counted one time. Important information you might want to track about providing information manually might be: Date offered, info provided by whom, patient name and ID.