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CMS Agrees that JCAHPO Certificants - COA, COT, COMT- Can Enter CPOE Orders for Meaningful Use 2

St. Paul, Minn. - (January 12, 2015) - JCAHPO is aware that there have been some questions recently in some parts of the ophthalmic community regarding which staff members are allowed to enter medication or laboratory orders under the CMS EHR Incentive Program for Computerized Provider Order Entry (CPOE) meaningful use. After considering all of the relevant regulations and CMS guidance, we believe that orders entered by credentialed ophthalmic assistants are included in the meaningful use criterion calculation as long as the applicable requirements are met. Significantly, recent CMS guidance confirms our interpretation of the requirements.

CMS guidance on the CPOE meaningful use criterion, including the Final Rule on EHR Incentive Programs - Stage 2 and an August 20, 2013 FAQ, permits inclusion of orders entered by staff members who perform similar functions to medical assistants but who have more specific titles due to their specialization, like ophthalmic assistants. These staff members must be appropriately credentialed by an organization other than the employing organization, such as JCAHPO. Further, each eligible provider participating in the EHR Incentive Program must determine that each included staff member is appropriately credentialed, performs similar assistive services as a medical assistant, and is in compliance with all applicable federal, state, and local law and professional guidelines.

On May 13, 2014, Elisabeth Myers, the Policy and Outreach Lead at the CMS Office of eHealth Standards and Services, responded to questions about the EHR program. Specifically, Myers responded to a question regarding the certifications offered by JCAHPO: QUESTION: Do the designations of Certified Ophthalmic Technologist, Certified Ophthalmic Assistant and Certified Ophthalmic Technician count as certified medical assistants able to enter orders into the EHR? ANSWER: Yes they count if they are they [sic] equivalent of a CMA. We don't specify every single variation on Medical Assistant because if we made a list and left someone out it would cause a problem. Instead we specify that: 1) The job title doesn't have to be "Medical Assistant" and 2) They don't have to be certified by AAMA we just use the AAMA definition of what 'certified' means which is certified by an accredited credentialing body outside the organization employing the MA.

JCAHPO is an Accredited Credentialing body. For more than 30 years, JCAHPO's three core certifications have been accredited by the National Commission for Certifying Agencies. Certified Ophthalmic Assistants (COA), Certified Ophthalmic Technicians (COT), and Certified Ophthalmic Medical Technologists (COMT) have received credentials appropriate under the
EHR Incentive Program requirements as confirmed by this response from CMS to JCAHPO and other organizations’ questions. It is the duty of each individual provider, however, to determine whether his or her staff members are appropriately credentialed under the regulations. Before orders entered by a particular staff member are included in the Incentive Program calculation, a provider should first document that the staff member meets the required criteria.

JCAHPO’s Commission and leadership congratulate all JCAHPO certificants for your accomplishments and commitment to excellence that is recognized by CMS. We hope that this information is helpful to you in determining your practice’s compliance with these requirements.

For more information, contact JCAHPO at 1-800-284-3937 or www.jcahpo.org. Or, to register for the ophthalmic scribe certification examination, go to www.eyecarece.org.

[About JCAHPO®]
The Joint Commission on Allied Health Personnel in Ophthalmology (JCAHPO®) was established as a not-for-profit organization in 1969 to offer certification and continuing education opportunities to ophthalmic allied health personnel. Since then, more than 25,000 people in the U.S., Canada, and around the world have earned JCAHPO® Certification. For more information, visit: www.jcahpo.org.

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