



Guide for Eligible Professionals Practicing in Multiple Locations

Eligible professionals who practice in multiple locations must take some additional steps in order to successfully participate in the Medicare and Medicaid Electronic Health Record (EHR) Incentive Programs.

Patient Encounters With Certified EHR Technology

In order to demonstrate meaningful use, eligible professionals who practice in multiple locations will need 50 percent of their patient encounters during the reporting period to take place at locations with certified EHR technology. Eligible professionals who meet this requirement need to calculate their meaningful use data using only patient encounters at locations with certified EHR technology.

>> DEFINITION OF PATIENT ENCOUNTERS

CMS defines patient encounters as any encounter where a medical treatment is provided and/or evaluation and management services are provided, except a *hospital inpatient department (Place of Service 21)* or a *hospital emergency department (Place of Service 23)*. Patient encounters in ambulatory surgical centers would be included for the purpose of this definition. For more information, see CMS FAQ [#3065](#) and [#3215](#).

For an eligible professional to demonstrate meaningful use, **50 percent** of patient encounters must take place at locations with certified EHR technology during the reporting period.

>> DETERMINE IF A LOCATION IS EQUIPPED WITH CERTIFIED EHR TECHNOLOGY

A practice or location is considered equipped with certified EHR technology if the eligible professional has access to the EHR at the beginning of the EHR reporting period at the practice or location.

Access to certified EHR technology would include:

- Certified EHR technology based at that location
- The eligible professional brings his or her certified EHR technology to the location on a portable device
- The eligible professional has access to a remotely-based certified EHR technology through devices available at the location

A location is equipped with certified EHR technology if the eligible professional has access to the EHR at the **beginning** of the EHR reporting period.

Eligible professionals, who practice at locations that host some, but not all, aspects of ambulatory certified EHR technology, must have access to ambulatory certified EHR technology that covers all the functionalities necessary for the eligible professional to meet meaningful use at that location in order to consider the location equipped. A location that does not provide access to an electronic prescribing module, for example, could not be considered equipped with certified EHR technology. For more information, see FAQ #[3077](#) and #[7811](#).

Calculate Meaningful Use Across Multiple Locations

Once an eligible professional has determined which locations are equipped with certified EHR technology and confirmed that at least 50 percent of their patient encounters occurred at those locations, the eligible professional can then calculate meaningful use measures across those locations. Eligible professionals can add the numerators and denominators calculated by each certified EHR system in order to arrive at an accurate total for the numerator and denominator of the measure. See FAQ #[3609](#) for more information.

An eligible professional can add numerators and denominators from **each certified EHR system** for an accurate total.

>> UNABLE TO ACCESS DATA FROM A LOCATION

An eligible professional is required to attest with complete data from all locations equipped with certified EHR technology in order to demonstrate meaningful use.

If an eligible professional is unable to obtain meaningful use data from a given location, the eligible professional is still required to include patients seen during the reporting period at that location in the denominator of meaningful use objectives. However, without meaningful use data available, the eligible professional will not be able to include actions taken for those patients in the numerator of meaningful use objectives, which can negatively impact performance on measures. If the eligible professional is still able to meet all of the measures after including patients seen in the denominator of measures, then he or she can successfully demonstrate meaningful use. See FAQ #[7815](#) for more information.

>> DIFFERENT MENU MEASURES ACROSS LOCATIONS

Practice locations may choose to implement different menu objectives and/or report on different clinical quality measures (CQMs). The eligible professional should combine data for menu objectives and CQMs across locations where possible, and report on menu objectives and CQMs from the location with the most patient encounters when other locations chose different menu objectives and/or CQMs. See FAQ #[7779](#) for more information.

An eligible professional should report on menu objectives and CQMs from the location with the **most patient encounters**, if the practicing locations chose different measures.