

California Medi-Cal HIE Onboarding Program (Cal-HOP)

**Cal-HOP Overview Webinar
for California's HIOs**

February 22, 2019

Today's Goals

- ① Provide details on the California Medi-Cal HIE Onboarding Program (Cal-HOP)
- ② Address questions from California Health Information Organizations (HIOs)

March 1st Webinar Goals

- ① Review details on the California Medi-Cal HIE Onboarding Program (Cal-HOP)
- ② Address questions from Provider Organizations

- **Cal-HOP Overview and Timeline**
- **Cal-HOP Structure**
- **Criteria for Qualifying HIOs**
- **Milestone Achievement**
- **Questions**

Cal-HOP Overview

Cal-HOP Overview

Vision and Approach

Vision

Expand Medi-Cal providers' access to and use of HIE services to:

- Help Medi-Cal providers meet meaningful use measures
- Improve provider access to information across a medical community
- Improve care coordination
- Improve the quality of care for patients
- Improve efficiency by reducing unnecessary utilization and waste
- Support specific Medi-Cal initiatives, including waiver programs (e.g., Whole Person Care)

Approach

- 1. Create a Realistic Pathway:** Establish an incremental progression of achievable milestones that incentivizes use of HIE services.
- 2. Leverage Existing Regional HIOs:** Expand participation in the community-focused resources of California's HIOs that have the technical capabilities to meet our vision.
- 3. Allow Flexibility:** Give Medi-Cal providers and HIOs the flexibility to determine how milestones are achieved.
- 4. Administer Efficiently and Effectively:** Balance program accountability and operational efficiency.
- 5. Monitor and Adjust:** Rigorously monitor and evaluate the program and make adjustments as needed.

Cal-HOP Overview

Goals

1. Connect

Increase the number of Medi-Cal providers exchanging patient data via a regional HIO

The value of electronic data exchange for Medi-Cal members and payers increases when the vast majority of Medi-Cal providers within a region participate in an HIO data-exchange network.

2. Expand

Expand the exchange capabilities of Medi-Cal providers that already participate in regional HIOs

Many HIO participants aren't exchanging the full complement of data that will improve the care of their Medi-Cal members.

HIO participants also find it difficult to access important HIO data directly from within their EHRs and workflows.

3. Integrate

Facilitate Medi-Cal providers' access to the CURES prescription drug monitoring database

The prevailing method of accessing CURES is via a web portal that requires extra workflow steps.

Integrating CURES directly into providers' EHRs would greatly facilitate compliance with the law and help to reduce over-prescribing of controlled substances.

Cal-HOP Timeline

Start and End Dates

Program Launch

- DHCS expects to “officially” launch the program in June 2019.
- DHCS awaiting CMS’s final approval of the Cal-HOP plan and supporting contracts.

Program Close

- CMS authorization for the program ends September 30, 2021.
- All Cal-HOP activities must be completed on or before September 30, 2021.

Cal-HOP Structure

Oversight and Implementation

Available Funding

- Up to \$50 million is available from a federal matching program through September 30, 2021.
- \$45 million from federal government and \$5 million match from the state's general fund (approved by CA legislature).

Milestone-Based Payments

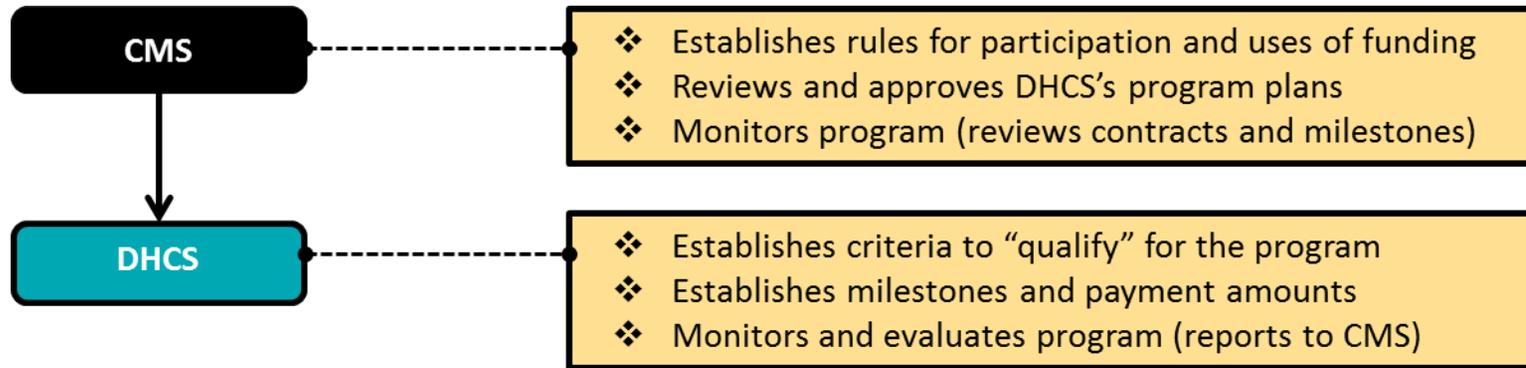
- DHCS will make incentive payments for HIOs and Medi-Cal providers when, working together, they meet specific onboarding and HIE connection milestones.

Key Participants

- **DHCS** will oversee the program and distribute funds.
- **Regional HIOs** will apply to be "qualified" to participate in the program and will receive payments for meeting milestones with "qualified" provider organizations.
- **Medi-Cal provider organizations** (e.g., hospitals, clinics, practices) will be "qualified" to participate in the program and receive support from the "qualified" HIOs.

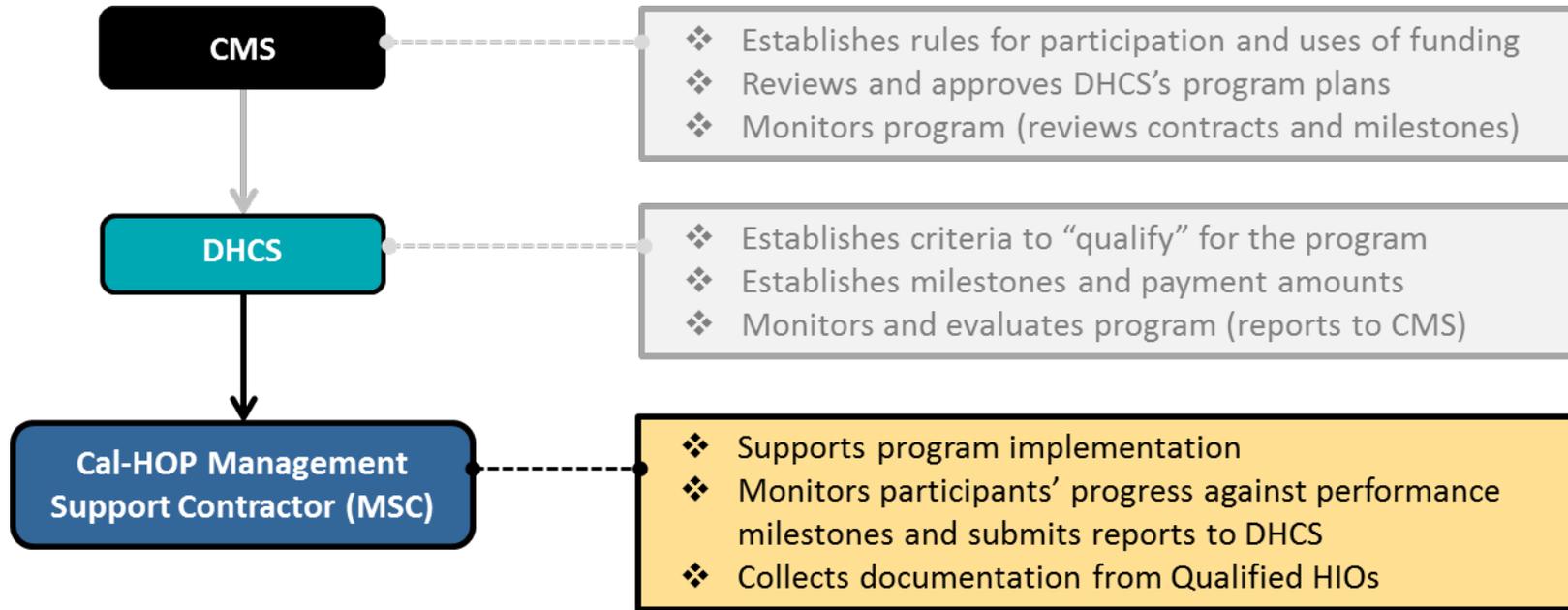
Cal-HOP Oversight

CMS and DHCS Roles



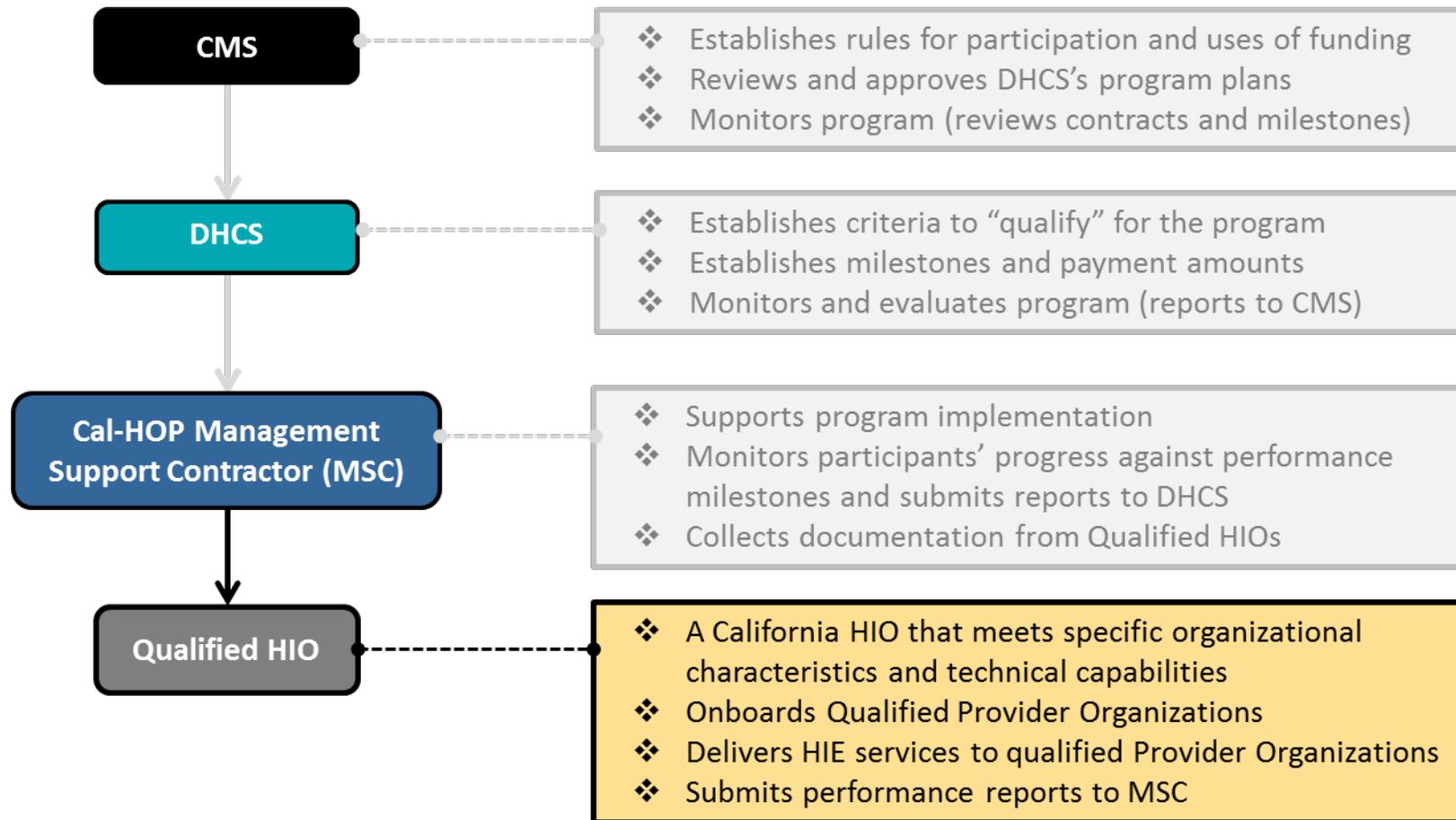
Cal-HOP Support

Management Support Contractor



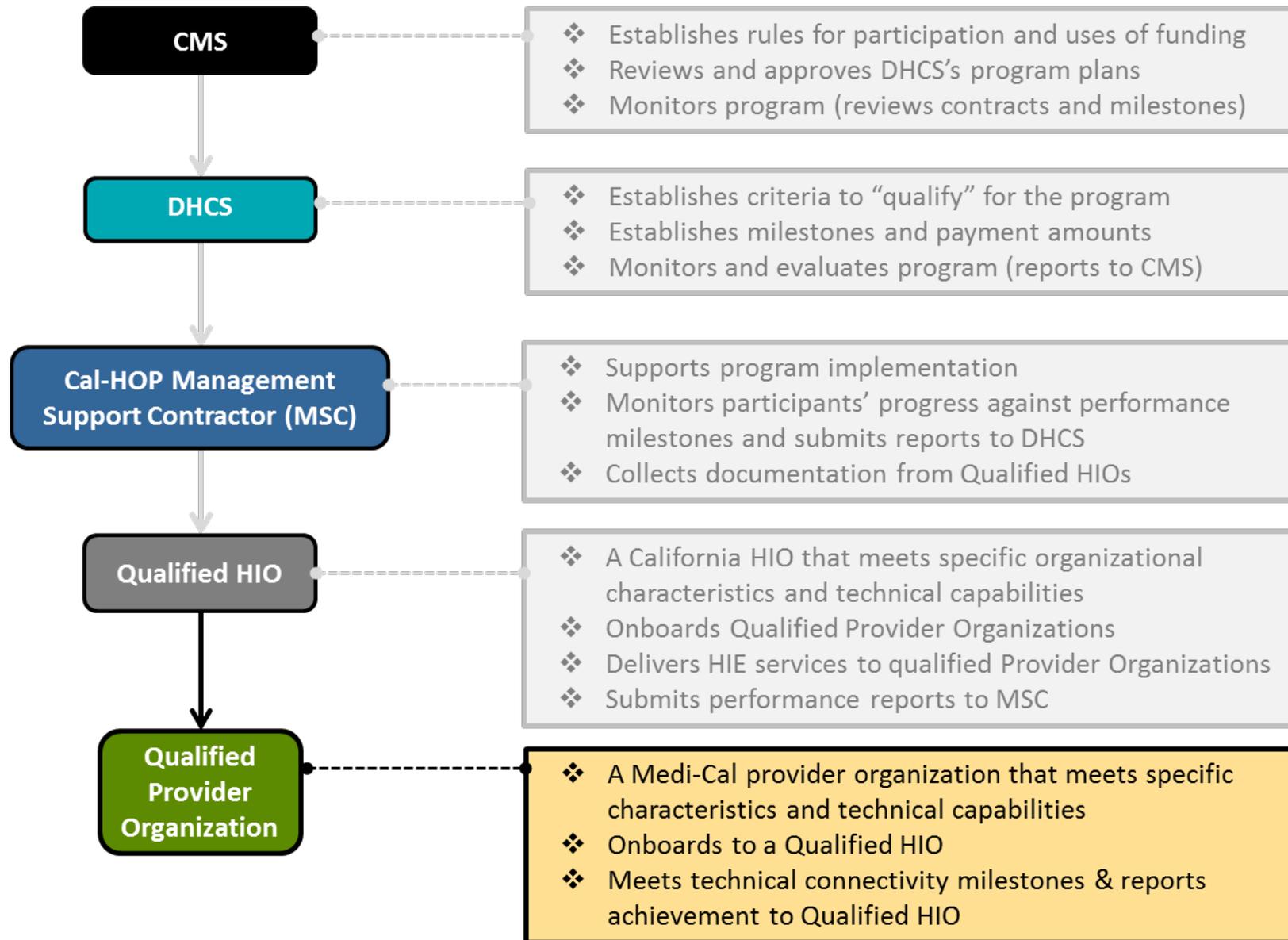
Cal-HOP Participants

Qualified HIOs



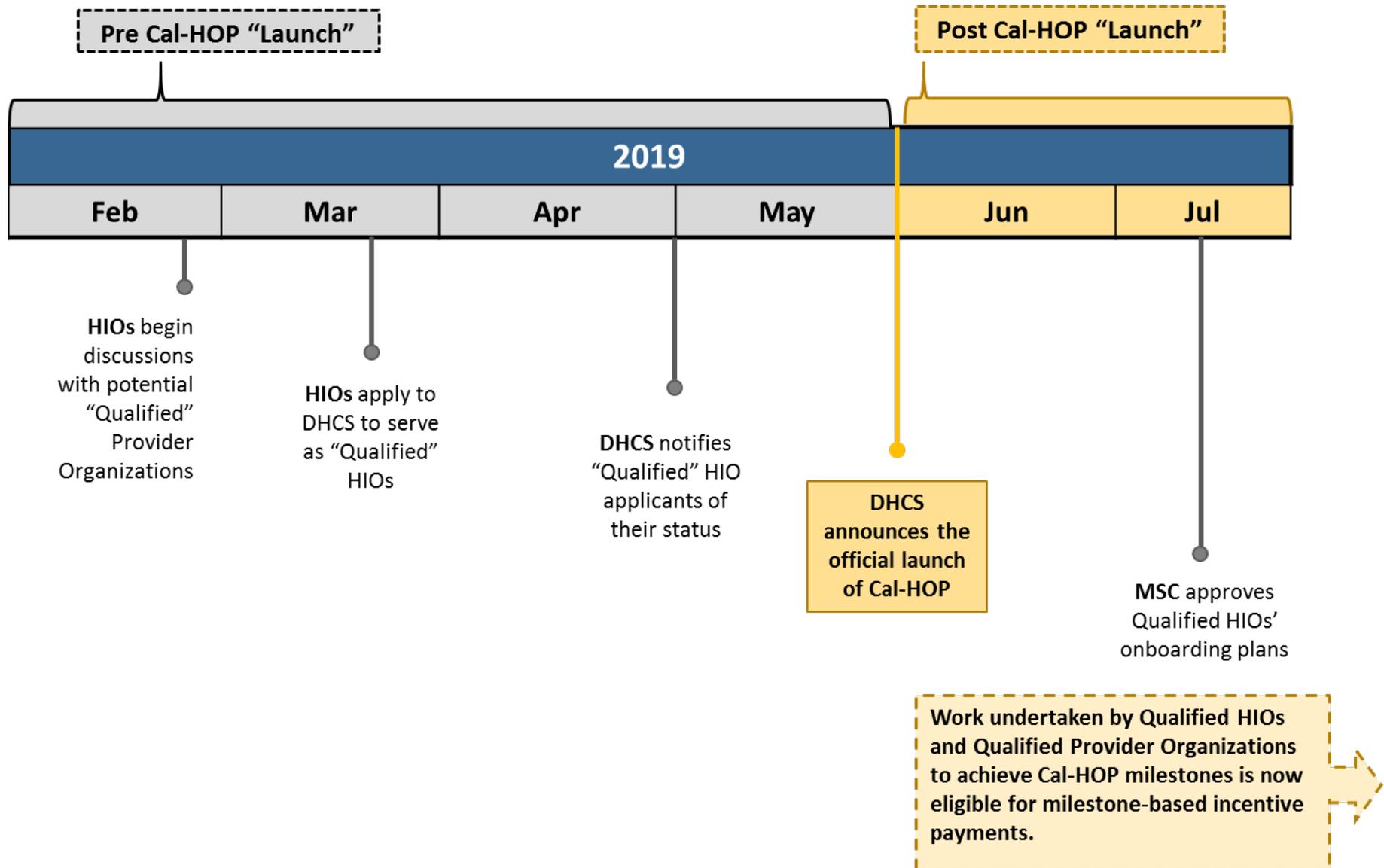
Cal-HOP Participants

Qualified Provider Organizations



Cal-HOP Timeline

Anticipated Timeline over the Next Six Months*



* Proposed timeline depends upon the timing of CMS's approval of Cal-HOP plan

Cal-HOP Structure
Funds Flow

Cal-HOP Funding

Basic Components

Total Amount Available \$50 Million

- A portion of the funds will be used to support program implementation and monitoring.

Program Deadline Sept 2021

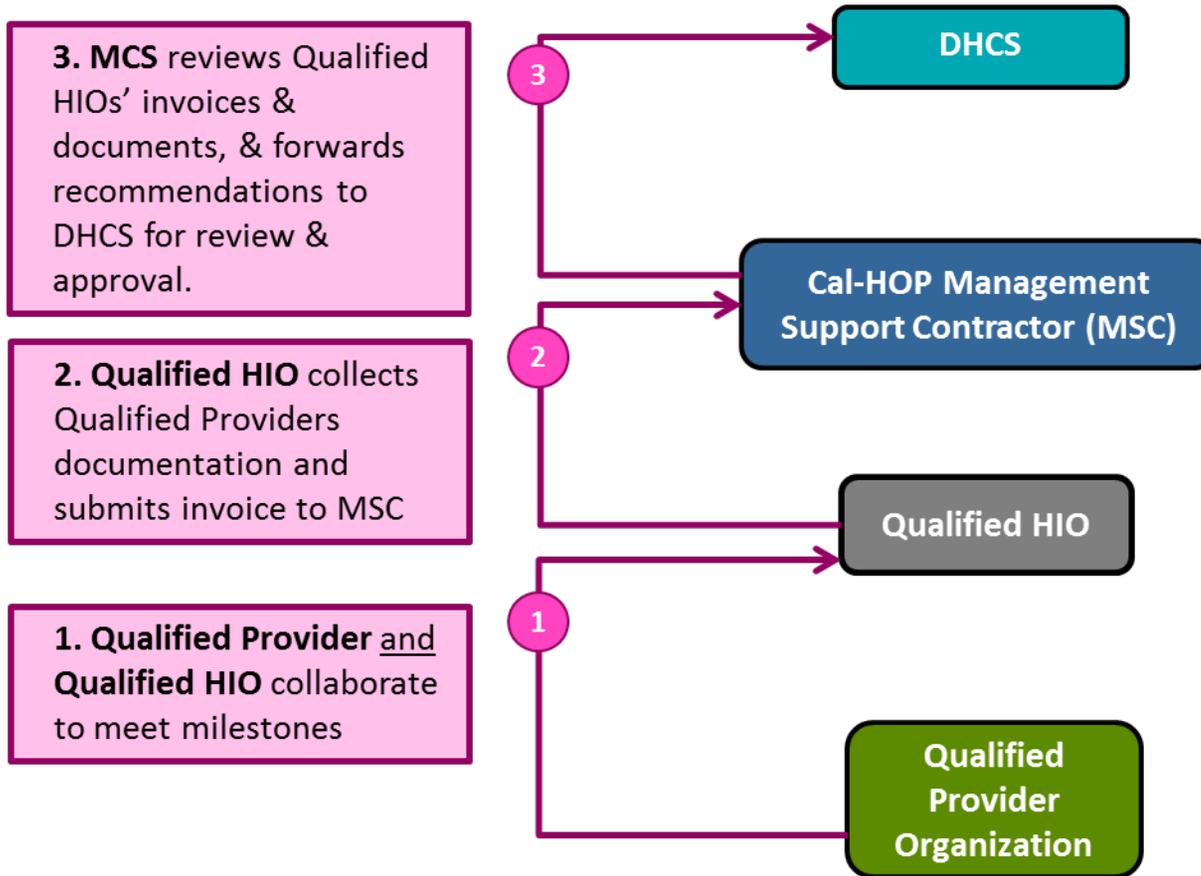
- CMS doesn't permit payments for activities performed after September 30, 2021.

Program Focus An Incentive Program, Not A Reimbursement Program

- With limited funding, Cal-HOP is not intended to fully reimburse participants' onboarding costs.
- DHCS will explore other mechanisms to help Medi-Cal providers and HIOs cover the costs to establish connectivity and use HIE services.

Cal-HOP Funding

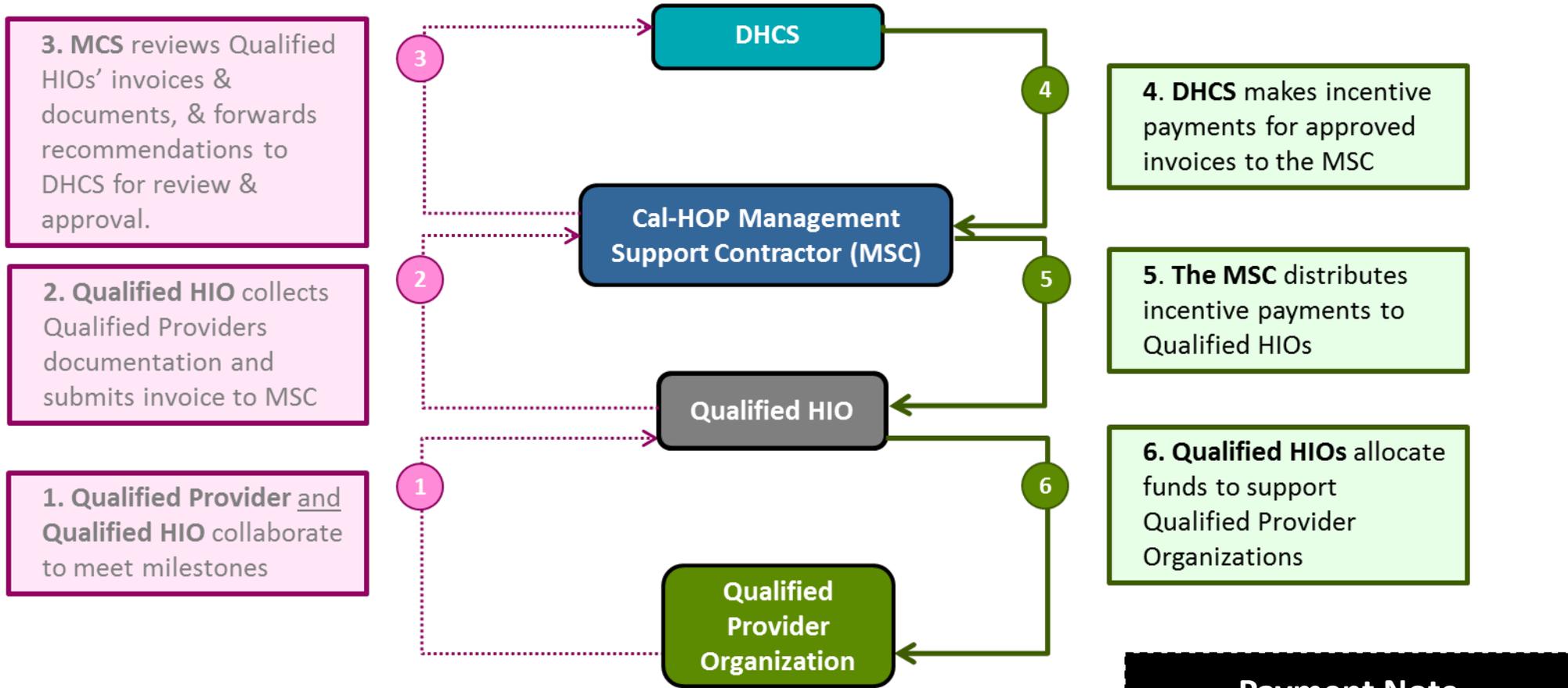
Reporting Milestone Achievement



Invoice Note

- Qualified HIOs will be able to submit documentation for achieving milestones to the MSC as they occur.

Cal-HOP Funding Payment Process



3. MCS reviews Qualified HIOs' invoices & documents, & forwards recommendations to DHCS for review & approval.

2. Qualified HIO collects Qualified Provider documentation and submits invoice to MSC

1. Qualified Provider and Qualified HIO collaborate to meet milestones

4. DHCS makes incentive payments for approved invoices to the MSC

5. The MSC distributes incentive payments to Qualified HIOs

6. Qualified HIOs allocate funds to support Qualified Provider Organizations

Payment Note

- DHCS will make payments to the MSC within 45 days of receiving a valid request.
- MSC will then make approved payments to Qualified HIOs w/in 10 days.

Qualified Provider Organization-Qualified HIO Relationship

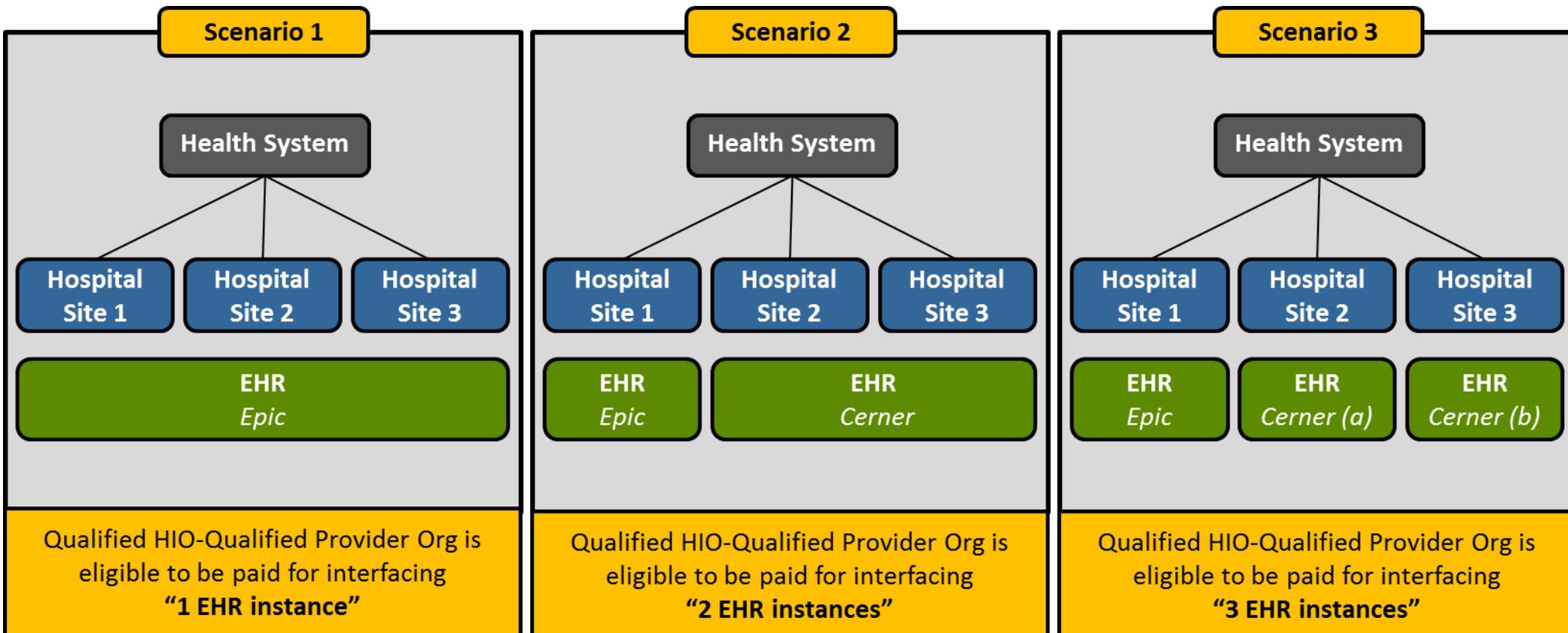
- ❖ For Cal-HOP, the Qualified Provider organizations must designate and work with a single Qualified HIO for achieving Cal-HOP milestones.
- ❖ Once a Qualified Provider Organization achieves Milestone 1 with a Qualified HIO, it must continue to work with that Qualified HIO to achieve any further Cal-HOP milestones (i.e., it may not “switch” and achieve milestones 2 or 3 with another Qualified HIO).
- ❖ Qualified Provider Organizations may participate in and connect to multiple HIOs in general, although Cal-HOP payments will only be made for milestones achieved with one Qualified HIO.

Cal-HOP Funds Flow

Milestone Payments Based on Interfaced EHR Instances

Milestone Payments

- ❖ Payments will be based on the number of interfaced EHR instances that the Qualified HIO and Qualified Provider Organization connect and NOT on the number of facilities that the Qualified HIO and Qualified Provider Organization connect.



Restrictions on Funding Per CMS

❖ CMS's restrictions on the use of Cal-HOP funds

1. Must be used to onboard only providers that bill or render services for Medi-Cal.
2. Must be used to help Medi-Cal "Eligible Professionals and Hospitals" fulfill the meaningful use objectives and measures in the Promoting Interoperability Program.
3. May not be used for ongoing HIE operations (can only be use for initial onboarding activities).
4. May not be used to purchase Certified EHR Technology or modify an EHR to add the functionality needed to achieve certification.

Eligible Uses for Funding Per DHCS

Qualified HIOs may use incentive payments to offset some of their costs, including:

- ❖ The Qualified HIO's costs to connect to a Qualified Provider organization's EHR.
- ❖ The Qualified HIO's costs to develop capabilities to perform the HIE services specified in the milestones.
- ❖ The Qualified HIO's costs to connect to statewide databases to achieve the specified milestones.

Qualified HIOs may use incentive payments to offset certain Qualified Provider Organization costs, including:

- ❖ Qualified Provider Organizations' costs for their EHR to connect to the Qualified HIO.
- ❖ Qualified Provider Organizations' cost to retain a technology consultant to develop interfaces between their EHR and the Qualified HIO.

Qualifying Criteria for HIOs

Organizational Characteristics

1. **A California-based non-profit organization or government entity**
2. **Publicly-declared mission is to support the exchange of information with organizations in a defined region**
3. **A multi-stakeholder organization that is: (1) not a health care provider organization or payor, (2) not majority owned by a provider organization or payor, and (3) not majority governed by a provider organization or payor**
4. **Open to participation by any healthcare enterprises that serve Medi-Cal patients regardless of their business affiliations or health IT vendors**
5. **Financially viable and sustainable**
6. **Sufficient insurance and liability coverage**
7. **Ability to scale operations to accommodate the projected onboarding**
8. **Demonstrated commitment from at least 25 Qualified Provider Organizations with the HIO in Cal-HOP**

Technical Capabilities

9. Receiving patient-specific clinical data on a regular basis from at least two, non-affiliated hospitals and making these data electronically available to other provider organizations
10. Signatory to the California Data Use and Reciprocal Sharing Agreement (CalDURSA)
11. Participant in good standing in the California Trusted Exchange Network (CTEN)

Publication and Reporting Requirements

12. Providing up-to-date, public listings of:
 - ❖ Current and planned capabilities to assist Qualified Provider organizations meet the Cal-HOP milestone requirements.
 - ❖ Applicable fees or fee-calculation methods for Qualified Providers to participate with the Qualified HIO and meet Cal-HOP milestones.
 - ❖ Names, organization type, and exchange services of all the provider organizations currently participating in the Qualified HIO.
13. Submit quarterly reports to DHCS regarding Cal-HOP onboarding activities within 15 days after the end of each quarter

Milestone Achievement Overview

Program Milestones

Focus and Organization Types

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Focus

- ❖ The goal is to create connections directly between Qualified Provider Organizations' health IT systems and Qualified HIOs.
- ❖ Milestones create an incremental pathway to high-value use cases (e.g., event-based notifications, access to critical clinical data, integration with CURES).

First Steps

- ❖ Type of Qualified Provider Organization will determine milestone payment amounts

- Hospitals

- Ambulatory Organizations

- Tier 1 (< 10 providers)

- Tier 2 (≥ 10 providers)

➤ DHCS will count providers based on CMS's definition of "eligible professional" for the Medicaid Promoting Interoperability Program, i.e., including one of the following five types of Medicaid professionals: (1) physicians, (2) dentists, (3) certified nurse-midwives, (4) nurse practitioners, and (5) physician assistants

Program Milestones

Steps and Timing

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Steps



Timing Considerations

- ❖ Milestone 2 must be completed within one year of Milestone 1 being achieved.
- ❖ Milestones 2 and Milestone 3 (if undertaken) must be completed before Sept 30, 2021.
- ❖ DHCS reserves the right to rescind funding distributed to Qualified HIOs if:
 - Live connections for Milestone 2 and (if undertaken) Milestone 3 are not maintained for 1 year, or
 - Milestone 2 is not achieved within 1 year of achieving Milestone 1.

1 Initiate Participation in Cal-HOP

Requirements

- ① Qualified Provider organization signs attestation of Medi-Cal participation.
- ② Qualified Provider organization signs attestation of its vendors' readiness to achieve selected milestone goals, to the extent that vendor participation will be required.
- ③ Qualified HIO provides executed documentation of the Qualified Provider Organization formal participation in the Qualified HIO (i.e., a participation agreement, data-sharing agreement, BAA, and other required documents signed by the Qualified Provider Organization).
- ④ Qualified Provider organization signs an agreement with the QHIO that documents: (1) the organization's intent to participate in Cal-HOP with the QHIO and (2) projection of the milestones it intends to achieve.

	Milestone 1 (<i>Cal-HOP Onboarding</i>)	Milestone 2a (<i>ADT/Event feed</i>)	Milestone 2b (<i>CURES link</i>)	Milestone 3 (<i>Advanced Interfaces</i>)
Hospitals	\$ 25,000			
Ambulatory Provider Tier 1 (<i>< 10 providers</i>)	\$ 5,000			
Ambulatory Provider Tier 2 (<i>≥ 10 providers</i>)	\$ 5,000			

ADT Submission and Event Notifications

Requirements

For Hospitals

- Documented live (at least daily) feed of ADT (or equivalent) messages delivered to the Qualified HIO within 24 hours of an ED visit, hospital admission, and hospital discharge for Medi-Cal patients who are eligible to be included in the Qualified HIO.
- If the hospital includes outpatient clinics*, documented (at least daily) feed of ADT (or equivalent) messages delivered to the Qualified HIO within 24 hours of an encounter for Medi-Cal patients who are eligible to be included in the Qualified HIO.
- Demonstrated access to and/or use of ADT-based encounter notifications provided by the Qualified HIO via a query/response (pull) mechanism or publish/subscribe (push) mechanism.

For Provider Practice, Clinic, IPA/Medical Group, and other non-Hospital organizations

- Documented (at least daily) feed of ADT (or equivalent) messages delivered to the Qualified HIO within 24 hours of an encounter for Medi-Cal patients who are eligible to be included in the Qualified HIO.
- Demonstrated access to and/or use of ADT-based encounter notifications provided by the Qualified HIO via a query/response (pull) or publish/subscribe (push) mechanism.

	Milestone 1 (Cal-HOP Onboarding)	Milestone 2a (ADT/Event feed)	Milestone 2b (CURES link)	Milestone 3 (Advanced Interfaces)
Hospitals		\$ 20,000		
Ambulatory Provider Tier 1 (< 10 providers)		\$ 10,000		
Ambulatory Provider Tier 2 (≥ 10 providers)		\$ 7,000		

Requirements

*For All Applicable Providers**

- ❑ Documented CURES PDMP data-querying and data-retrieval function that is provided by the Qualified HIO and is integrated into the clinical workflow of the Qualified Provider organization's EHR.

-OR-

- ❑ Qualified Provider organizations that already integrate with the CURES database from within their EHRs via a mechanism other than the Qualified HIO (e.g., provided by their EHR vendor directly, or a 3rd party) will be exempt from having to meet connectivity to CURES through the Qualified HIO.

Note: Milestone 2 payments will be adjusted depending upon which CURES integration approach is taken.

** Provider organizations required by law to consult the CURES database when prescribing controlled substances.*

Note: Qualified HIOs will receive separate DHCS funding to build interfaces between the Qualified HIO and CURES

	Milestone 1 (Cal-HOP Onboarding)	Milestone 2a (ADT/Event feed)	Milestone 2b (CURES link)	Milestone 3 (Advanced Interfaces)
Hospitals			\$ 30,000	
Ambulatory Provider Tier 1 (< 10 providers)			\$ 15,000	
Ambulatory Provider Tier 2 (≥ 10 providers)			\$ 11,000	

3 Advanced HIE Services: Categories and Payments

Requirements

- ❖ Qualified Provider Organization and Qualified HIO must implement a specified number of advanced interfaces selected from a list of **35** designated interface types.
 - **Hospitals** must implement **5** such advanced interfaces
 - **Ambulatory providers** must implement **3** such advanced interfaces

- ❖ Qualified Provider Organization and Qualified HIO may identify alternative types of advanced interfaces to qualify for Milestone 3 achievement, contingent on DHCS approval.

3 Advanced HIE Services: “Categories” & “Interfaces”

**Qualified HIO and Qualified Provider organization must implement interfaces listed below
(may choose from any category(ies))**

Category A: Data feeds between a Qualified Provider Organization’s EHR and a Qualified HIO	Category B: Data submission or retrieval services with Public Health Registries into Qualified Provider Organization’s EHR	Category C: Integration of clinical data from the HIO into the provider’s EHR via web-services API (e.g., FHIR)	Category D: Activation of a new edge server and/or addition of following data types to existing edge server
<ul style="list-style-type: none"> <input type="checkbox"/> Laboratory results via HL7 messaging <input type="checkbox"/> Med list via HL7 messaging <input type="checkbox"/> Radiology reports via HL7 messaging <input type="checkbox"/> Discharge summaries via HL7 messaging <input type="checkbox"/> Referral request via HL7 <input type="checkbox"/> Consult note via HL7 <input type="checkbox"/> Structured clinical documents – as HL7 C-CDAs (CCD, Discharge Summary, Referral Note, Consultation Note) <input type="checkbox"/> EMS NEMSIS reports <input type="checkbox"/> ERx info including SCRIPT regarding ordering, fill, & cancel 	<ul style="list-style-type: none"> <input type="checkbox"/> Submission of immunizations from QP to CAIR2 registry <input type="checkbox"/> Real-time retrieval of immunizations from CAIR2 registry to QP within clinical workflow – via API or SSO <input type="checkbox"/> Submission of Advance Directives / POLST forms to POLST registry <input type="checkbox"/> Real-time retrieval of ADs/POLST forms from POLST registry within clinical workflow – via API or SSO <input type="checkbox"/> Submission of diagnosis/treatment data for reportable events from QP to CalREDIE registry 	<ul style="list-style-type: none"> <input type="checkbox"/> Laboratory results <input type="checkbox"/> Medication lists <input type="checkbox"/> Problem lists <input type="checkbox"/> Radiology reports <input type="checkbox"/> Diagnostic quality images <input type="checkbox"/> Discharge summaries <input type="checkbox"/> Immunizations <input type="checkbox"/> Advance Directives / POLST <input type="checkbox"/> Patient summary (e.g., CCD) <input type="checkbox"/> EMS NEMSIS reports 	<ul style="list-style-type: none"> <input type="checkbox"/> CCD document <input type="checkbox"/> Other C/CDA document <input type="checkbox"/> Laboratory results <input type="checkbox"/> Radiology reports <input type="checkbox"/> Diagnostic quality images <input type="checkbox"/> Medication lists <input type="checkbox"/> Allergies <input type="checkbox"/> Problem lists <input type="checkbox"/> Immunizations <input type="checkbox"/> Advance Directives / POLST <input type="checkbox"/> EMS NEMSIS reports

Category E: “Other”

HIOs may petition DHCS to implement other type(s) of interfaces to count towards Milestone 3

Advanced HIE Services: “Selection” and “Payments”

Hospital Requirements

➤ Must implement **five** interfaces with Qualified HIO

Ambulatory Organization Requirements

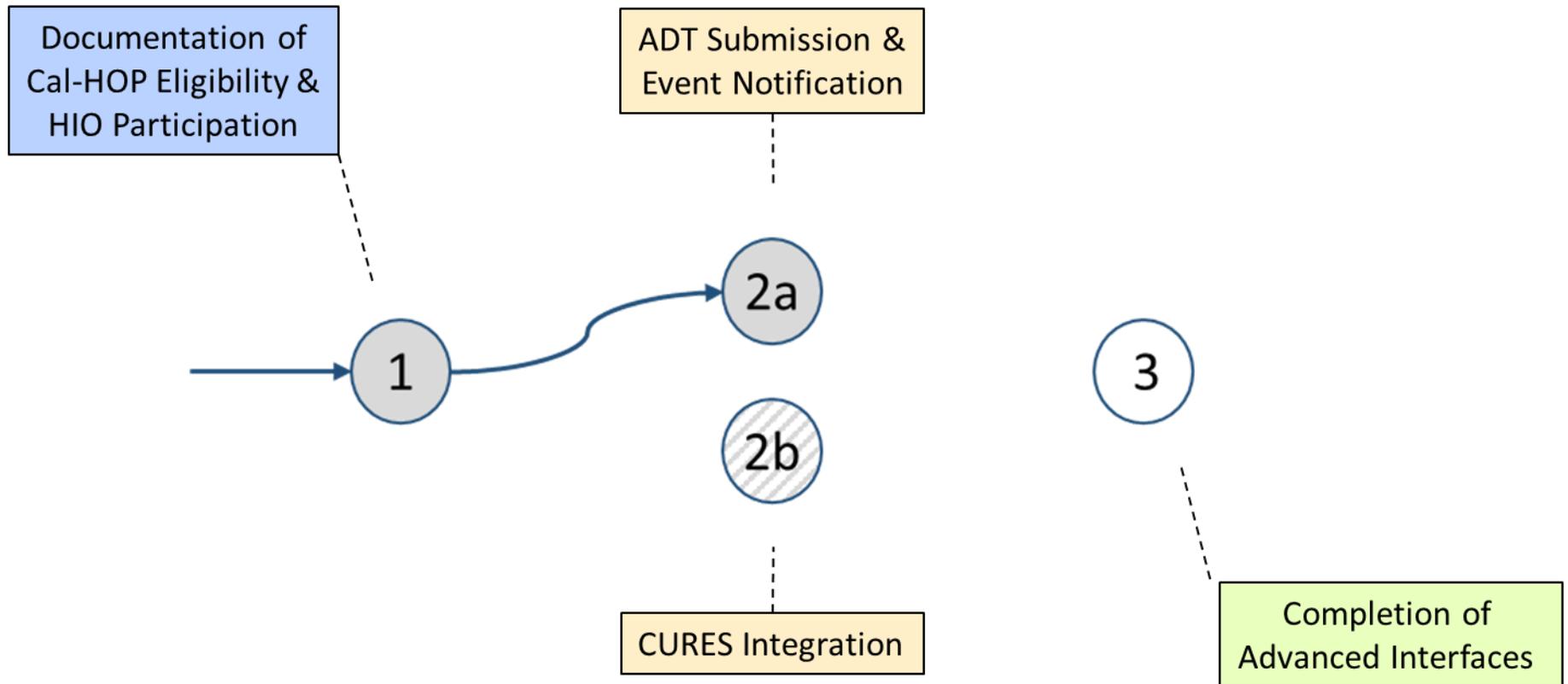
➤ Must implement **three** interfaces with Qualified HIO

Category A: Data feeds between a Qualified Provider Organization’s EHR and a Qualified HIO	Category B: Data submission or retrieval services with Public Health Registries into Qualified Provider Organization’s EHR	Category C: Integration of clinical data from the HIO into the provider’s EHR via web-services API (e.g., FHIR)	Category D: Activation of a new edge server and/or addition of following data types to existing edge server
<ul style="list-style-type: none"> <input type="checkbox"/> Laboratory results via HL7 messaging <input type="checkbox"/> Med list via HL7 messaging <input type="checkbox"/> Radiology reports via HL7 messaging <input type="checkbox"/> Discharge summaries via HL7 messaging <input type="checkbox"/> Referral request via HL7 <input type="checkbox"/> Consult note via HL7 <input type="checkbox"/> Structured clinical documents – as HL7 C-CDAs (CCD, Discharge Summary, Referral Note, Consultation Note) <input type="checkbox"/> EMS NEMSIS reports <input type="checkbox"/> ERx info including SCRIPT regarding ordering, fill, & cancel 	<ul style="list-style-type: none"> <input type="checkbox"/> Submission of immunizations from QP to CAIR2 registry <input type="checkbox"/> Real-time retrieval of immunizations from CAIR2 registry to QP within clinical workflow – via API or SSO <input type="checkbox"/> Submission of Advance Directives / POLST forms to POLST registry <input type="checkbox"/> Real-time retrieval of ADs/POLST forms from POLST registry within clinical workflow – via API or SSO <input type="checkbox"/> Submission of diagnosis/treatment data for reportable events from QP to CalREDIE registry 	<ul style="list-style-type: none"> <input type="checkbox"/> Laboratory results <input type="checkbox"/> Medication lists <input type="checkbox"/> Problem lists <input type="checkbox"/> Radiology reports <input type="checkbox"/> Diagnostic quality images <input type="checkbox"/> Discharge summaries <input type="checkbox"/> Immunizations <input type="checkbox"/> Advance Directives / POLST <input type="checkbox"/> Patient summary (e.g., CCD) <input type="checkbox"/> EMS NEMSIS reports 	<ul style="list-style-type: none"> <input type="checkbox"/> CCD document <input type="checkbox"/> Other C/CDA document <input type="checkbox"/> Laboratory results <input type="checkbox"/> Radiology reports <input type="checkbox"/> Diagnostic quality images <input type="checkbox"/> Medication lists <input type="checkbox"/> Allergies <input type="checkbox"/> Problem lists <input type="checkbox"/> Immunizations <input type="checkbox"/> Advance Directives / POLST <input type="checkbox"/> EMS NEMSIS reports
Category E: “Other”			
HIOs may petition DHCS to implement other type(s) of interfaces to count towards Milestone 3			

	Milestone 1 <i>(Cal-HOP Onboarding)</i>	Milestone 2a <i>(ADT/Event feed)</i>	Milestone 2b <i>(CURES link)</i>	Milestone 3 <i>(Advanced Interfaces)</i>
Hospitals				\$ 75,000
Ambulatory Provider Tier 1 (< 10 providers)				\$ 25,000
Ambulatory Provider Tier 2 (≥ 10 providers)				\$ 25,000

Milestone Achievement
Example Scenarios

Minimum Milestone Achievement to Receive Payment (1)



Legend



Milestone Achieved

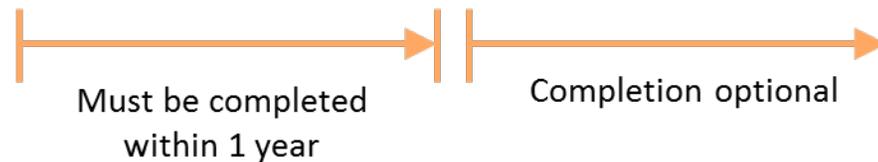
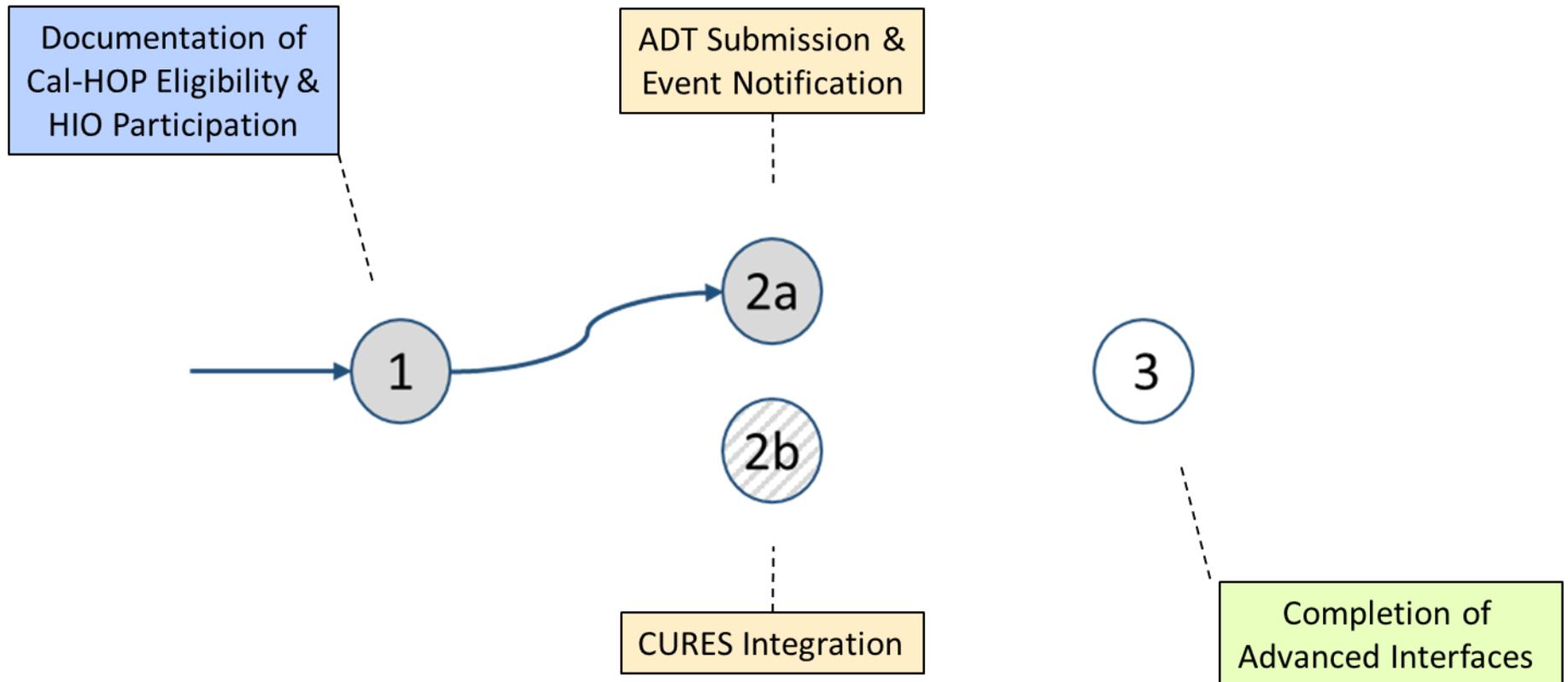


Milestone Not Achieved



Exempt from Milestone
(Achieved through means other than the HIO
or already achieved prior to Cal-HOP program)

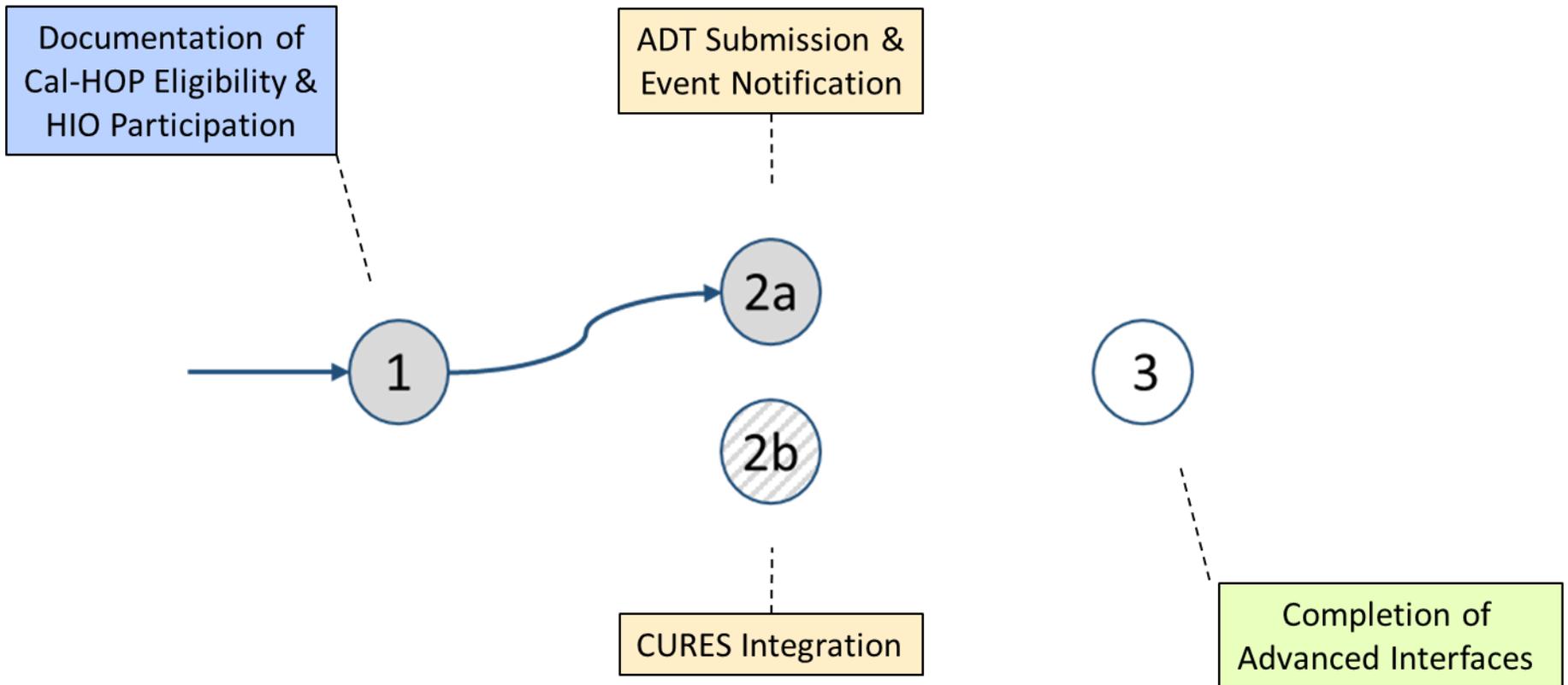
Minimum Milestone Achievement to Receive Payment (2)



Legend

-  Milestone Achieved
-  Milestone Not Achieved
-  Exempt from Milestone (Achieved through means other than the HIO or already achieved prior to Cal-HOP program)

Minimum Milestone Achievement to Receive Payment (3)



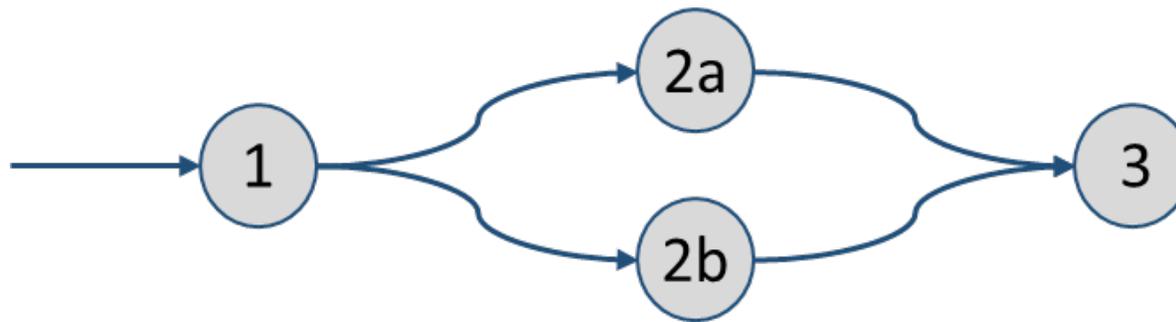
	Milestone 1 (<i>Cal-HOP Onboarding</i>)	Milestone 2a (<i>ADT/Event feed</i>)	Milestone 2b (<i>CURES link</i>)	Milestone 3 (<i>Advanced Interfaces</i>)	Total Per Hospital EHR Instance
Hospital	\$ 25,000	\$ 20,000	-	-	\$ 45,000

Legend

-  Milestone Achieved
-  Milestone Not Achieved
-  Exempt from Milestone
(Achieved through means other than the HIO or already achieved prior to Cal-HOP program)

Maximum-Payment Scenario

Hospital participates in Cal-HOP and completes both elements of Milestone 2, and goes on to complete Milestone 3.



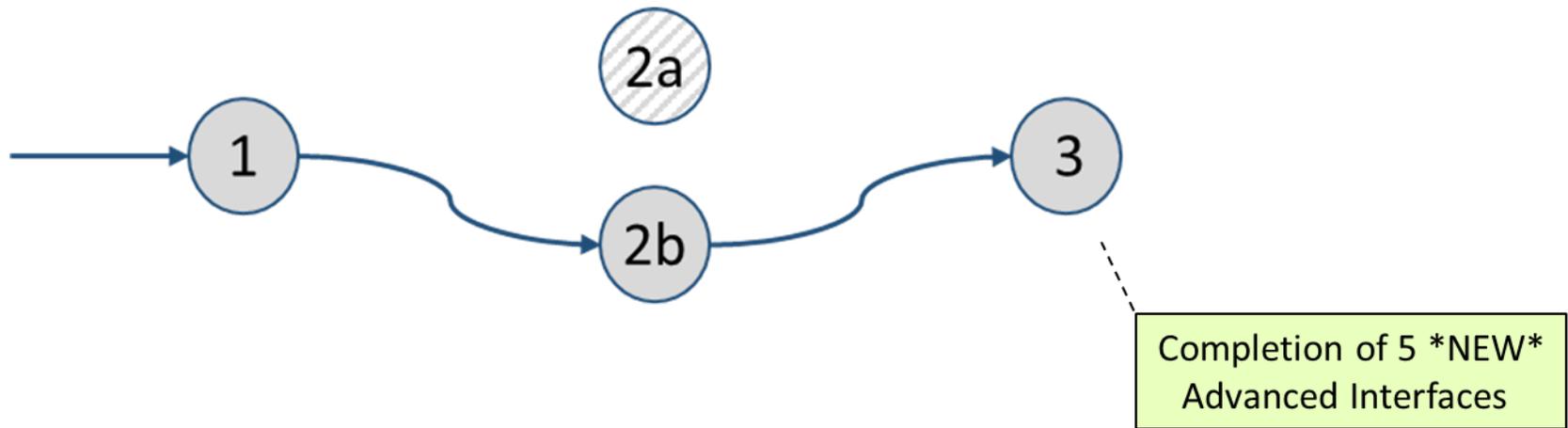
	Milestone 1 <i>(Cal-HOP Onboarding)</i>	Milestone 2a <i>(ADT/Event feed)</i>	Milestone 2b <i>(CURES link)</i>	Milestone 3 <i>(Advanced Interfaces)</i>	Total Per Hospital EHR Instance
Hospital	\$ 25,000	\$ 20,000	\$ 30,000	\$ 75,000	\$ 150,000

Legend

-  Milestone Achieved
-  Milestone Not Achieved
-  Exempt from Milestone
(Achieved through means other than the HIO or already achieved prior to Cal-HOP program)

Prior HIO Participant Scenario

Existing hospital of an HIO now participates in Cal-HOP. The hospital is exempted from completing Milestone 2a, completes Milestone 2b, and goes on to complete Milestone 3.



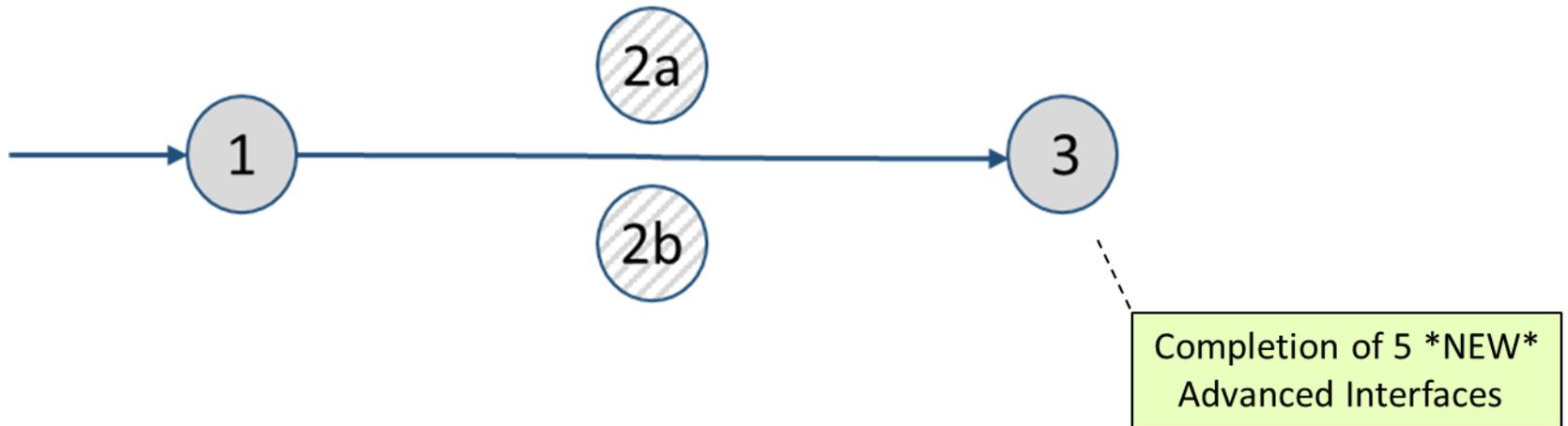
	Milestone 1 <i>(Cal-HOP Onboarding)</i>	Milestone 2a <i>(ADT/Event feed)</i>	Milestone 2b <i>(CURES link)</i>	Milestone 3 <i>(Advanced Interfaces)</i>	Total Per Hospital EHR Instance
Hospital	\$ 25,000	-	\$ 30,000	\$ 75,000	\$ 130,000

Legend

-  Milestone Achieved
-  Milestone Not Achieved
-  Exempt from Milestone
(Achieved through means other than the HIO or already achieved prior to Cal-HOP program)

Milestone 3 Only Scenario

Existing member of an HIO now participates in Cal-HOP. The hospital already has an ADT interface, interfaces directly to CURES via its EHR, but completes Milestone 3.



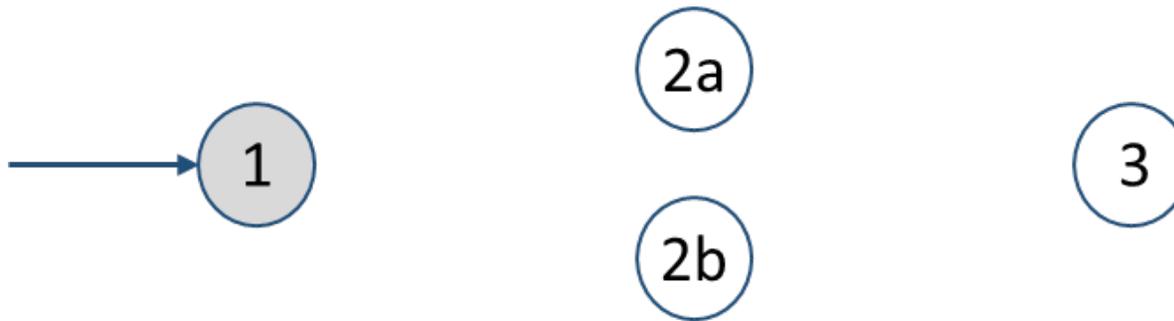
	Milestone 1 <i>(Cal-HOP Onboarding)</i>	Milestone 2a <i>(ADT/Event feed)</i>	Milestone 2b <i>(CURES link)</i>	Milestone 3 <i>(Advanced Interfaces)</i>	Total Per Hospital EHR Instance
Hospital	\$ 25,000	-	-	\$ 75,000	\$ 100,000

Legend

-  Milestone Achieved
-  Milestone Not Achieved
-  Exempt from Milestone
(Achieved through means other than the HIO or already achieved prior to Cal-HOP program)

“Clawback” Scenario 1

Hospital achieves Milestone 1 and receives milestone payment, but fails to complete or get exemption for any of the Milestones 2a, 2b, or 3 within the required time frames.



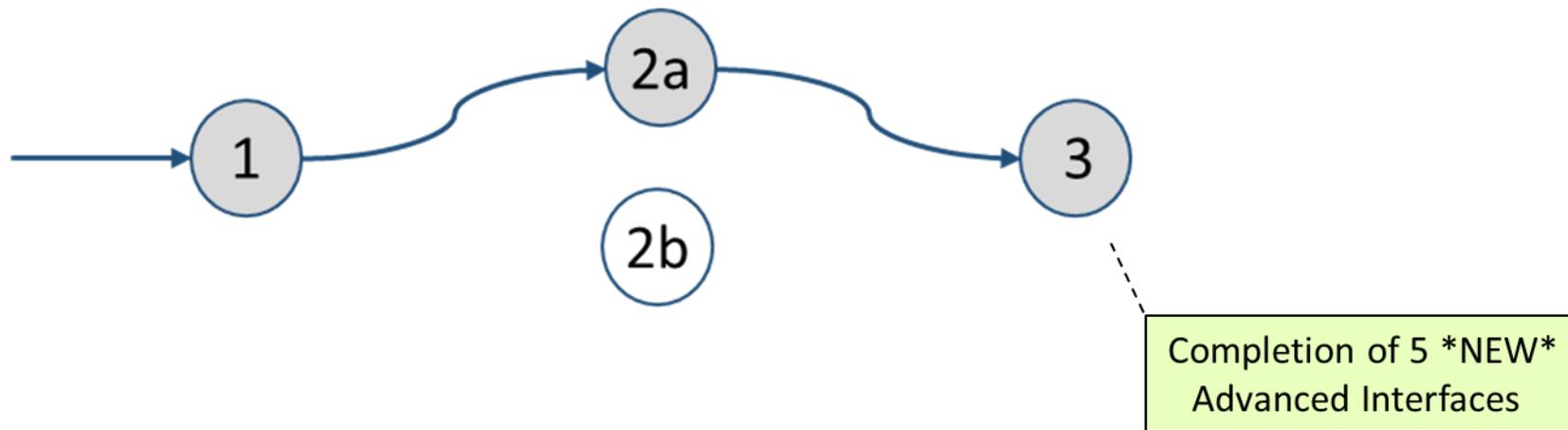
	Milestone 1 <i>(Cal-HOP Onboarding)</i>	Milestone 2a <i>(ADT/Event feed)</i>	Milestone 2b <i>(CURES link)</i>	Milestone 3 <i>(Advanced Interfaces)</i>	Total Per Hospital EHR Instance
Hospital	\$ 25,000	-	-	-	\$ 25,000
Clawback amount	<i>\$ (25,000)</i>	-	-	-	<i>\$ (25,000)</i>

Legend

-  Milestone Achieved
-  Milestone Not Achieved
-  Exempt from Milestone
(Achieved through means other than the HIO or already achieved prior to Cal-HOP program)

“Clawback” Scenario 2: Incomplete Milestone 2

Hospital participates in Cal-HOP, completes Milestone 2a, fails to complete or be exempted from Milestone 2b within the required time frame, and goes on to complete Milestone 3.



	Milestone 1 (<i>Cal-HOP Onboarding</i>)	Milestone 2a (<i>ADT/Event feed</i>)	Milestone 2b (<i>CURES link</i>)	Milestone 3 (<i>Advanced Interfaces</i>)	Total Per Hospital EHR Instance
Hospital	\$ 25,000	-	-	-	\$ 25,000
Clawback amount	<i>\$ (25,000)</i>	-	-	-	<i>\$ (25,000)</i>

Legend

-  Milestone Achieved
-  Milestone Not Achieved
-  Exempt from Milestone
(Achieved through means other than the HIO or already achieved prior to Cal-HOP program)

Questions