July 11, 2017

Frequently Asked Questions

In this section of the Medicaid EHR Incentive Program newsletter, we will be reviewing your frequently asked questions. If you would like your question considered for publication, contact the Medicaid EHR incentive coordinator at medicaidEHR@corhio.org.

Q: What can the Medicaid EHR Incentive Program Coordinator do for my practice?

A: The Medicaid EHR Incentive Coordinator can answer basic questions regarding the Medicaid EHR Incentive Program requirements, give program updates, help providers through the attestation process, provide educational opportunities including webinars and other materials related to the program.

Q: I am not going to meet Meaningful Use (MU) requirements for the Medicaid EHR Incentive Program or submit to the Medicare Quality Payment Program to avoid Medicare payment adjustments. Do I need to submit a hardship application to Medicare to avoid penalties?

A: Yes, you can submit a hardship application but understand there are requirements to do so. For more information on the hardship application, please follow the link to CMS.

If providers meet the inclusion criteria for Merit Based Incentive Program System (MIPS), providers must submit to MIPS to avoid a Medicare payment adjustment. Eligible Professionals can submit to the Medicaid EHR Incentive Program if program requirements are met and will not receive penalties for non-participation in this program. Historically if providers submitted to the Medicaid EHR Incentive Program, they would avoid a Medicare payment adjustment. But now that the programs are distinctly different, this no longer applies.

Q: Does Colorado have any resources for the Quality Payment Program?

A: Yes, please see the Colorado Quality Payment Program website for more information about MIPS. The website is a great resource as there are monthly webinars on various topics related to QPP. The next webinar is July 25th focusing on the Improvement Activity Performance Category.
Program Update

The opening of the Colorado Registration & Attestation site for PY 2016 Medicaid EHR Incentive Program attestations will be delayed until fall of 2017 for Eligible Professionals (EP), Eligible Hospitals (EH) and Critical Access Hospitals (CAH). Specifically, the Colorado Department of Health Care Policy and Financing has placed its resources into the transition of its new claims system (interChange) and issuing provider payments for Medicaid covered services.

Please keep reading the Medicaid EHR Incentive Program newsletter as it is the primary resource to bring you up-to-date information about the incentive program.

Remember to register at CMS for the Medicaid EHR Incentive program. All registrations will be pended and waiting for state response until the new State Level Registry (R&A) is available. Once the SLR is live, it will update the CMS registration status.

Program Year 2016 is the last year to begin participation in the Medicaid EHR Incentive Program.

Feature Article

The Office of the National Coordinator for Health Information Technology updated its Certified Health IT Product List homepage. The update includes some shortcut buttons that will allow users to see a list of all 2015 Edition products that are certified to the Application Program Interface (API) criteria, products under corrective action, decertified products, inactive certificates and banned developers. The update will allow providers to easily access information regarding the Electronic Health Record (EHR) certification information.

It is required for Program Year 2016 to have an up-to-date Certified Electronic Health Record Technology (CEHRT) number.

Certification numbers can change periodically, so it’s critical to verify these numbers prior to attesting to MU each program year. Many attestations are stalled because the CEHRT number provided during attestation does not match the current certification number by the Office of the National Coordinator (ONC). To find the certification number for the version of your EHR please visit the Certified Health IT Product List (CHPL) on the ONC website.

Program Year 2016 – EPs, EHs and CAHs will attest to Modified Stage 2 objectives and measures and have a 90-day reporting period and will be required to be on a 2014 edition CEHRT.

Program Year 2017 – EPs, EHs and CAHs have the option of attesting to Stage 3 in 2017. If this option is chosen, a provider/entity will have a 90-day reporting period and will be required to be on a 2015 edition CEHRT or a combination of 2014 and 2015 CEHRT. In 2017, Medicaid EPs have the option to report to the Modified Stage 2 or Stage 3 objectives and measures. As a reminder, EPs who are eligible only for the Medicaid EHR Incentive Program are not subject to payment adjustments.
Program Year 2018 – All providers will attest to Stage 3 measures in 2018 with a full calendar year reporting period including a full year reporting period for Clinical Quality Measures (CQMs). If an EP is reaching Meaningful Use for the first time it will be a consecutive 90-day reporting period including a consecutive 90-day reporting period for CQMs. All EPs and EHs will be required to be on a 2015 edition CEHRT.

The above requirements are subject to change due to the proposed Inpatient Prospective Payment Systems (IPPS) rule.

Anticipated Timeline – Colorado Medicaid EHR Incentive Program

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<th>CO R&amp;A System open for EPs to attest to 2016 Meaningful Use</th>
<th>Fall 2017</th>
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<tr>
<td>CO R&amp;A System open for EHs and CAHs to attest to 2016 Meaningful Use</td>
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*Please remember to register for the Medicaid EHR Incentive Program at CMS. Colorado EPs will be able to register for the Colorado Medicaid Incentive Program once the state’s site becomes available. Continue to visit the CORHIO website for information.

If you know someone that would benefit from receiving this newsletter, send them the following link to subscribe: http://www2.corhio.org/emailPreference/e/5402/307

For questions regarding program requirements, eligibility and Meaningful Use, contact:
Medicaid EHR Incentive Program Coordinator
Kelly Hernandez
(720) 285-3232
MedicaidEHR@corhio.org

Medicaid Program Point of Contact and Partnerships

The Department of Healthcare Policy and Financing has partnered with CORHIO to provide program coordination and assist with provider communications and outreach regarding the Medicaid EHR Incentive Program. The Medicaid EHR Incentive Program Coordinator is the central point of contact for EPs, EHs, partners and other interested parties regarding requirements and processes. Inquiries concerning the Medicaid EHR Incentive Program can be sent to MedicaidEHR@corhio.org or by calling (720) 285-3232.