COLORADO MEDICAID
EHR INCENTIVE PROGRAM

PROGRAM UPDATE

August 21, 2019

Audits Over Multiple Program Years

Currently, some participants are experiencing pre- and post-payment audits from Myers and Stauffer for several program years simultaneously. The Department of Health Care Policy and Financing (the Department) understands the multiple program year audits may cause some confusion.

To ensure participants and auditors are communicating successfully, it is important to read emails from Myers and Stauffer in their entirety, including subject lines, so you are aware of which program year the email is referencing. When responding to Myers and Stauffer, remember to answer to the specific email chains for each program year referenced.

> Over 870 have submitted attestations with over $7,000,000 in Medicaid EHR Incentive Program payments awarded.
>
> Look here for updates on changes to the MAPIR system for PY 2019!

It is important to respond in a timely manner to Myers and Stauffer, but if you need clarification or an extension to a deadline, please reach out as soon as possible. In many cases, participants may be required to update license, address, payee address, their contract with Medicaid or change their surname within several platforms such as interChange (Medicaid Provider Portal), Centers for Medicare and Medicaid Services (CMS) and Department of Regulatory Agencies (DORA). Although it is important to make updates before attesting to any program year, not updating at all will result in a denial of your attestation.

How Will the New Colorado NPI Law Effect Medicaid Providers?

The House Bill (HB) 18-1282 will require new and currently enrolled organizations (not individual Eligible Professionals) to acquire a separate National Provider Identifier (NPI) for each service location and provider type in the Colorado interChange (Medicaid Provider Portal).

Although individual participants to the Medicaid EHR Incentive Program do not need to obtain new NPIs, their organization NPIs may change due to different service locations or provider types. Please see below to reference what will impact participants acquiring an NPI for each service location and provider type.

- Enrollment, Revalidation and Claims
    - Please see this link for further information.
- Payee NPI at CMS registration
    - It is imperative that a payee should not be updated until an attestation has been completed. If an NPI is prematurely updated before the incentive payment is completed, you risk the payment mapping to the wrong location or being lost entirely.
- Patient Volume at Service Locations
    - Prematurely updating the NPI could potentially impact patient volume and put you at the risk of not meeting requirements for the Medicaid EHR Incentive Program.

- Incentive Payment Routing
    When updating an NPI prematurely, the incentive payment may be routed to the wrong location resulting in delayed payments.

This bill goes into effect January of 2020 for new enrollments and January 2021 for current enrollments. To find more information on the new Colorado NPI Law follow this link for a factsheet, webinar and FAQs.

Upgrading EHR Certification for Stage 3

All Eligible Professionals (EPs) participating in Program Year 2019 must have Certified Electronic Health Record Technology (CEHRT) 2015 edition to attest. Many participants are confused about when the CEHRT 2015 edition needs to be implemented.

Once participants choose an EHR Reporting period, they need to make sure the CEHRT 2015 edition is in place and functioning on the *first* day of the 90-day EHR reporting period. The EHR Reporting Period will need to be certified until the last day of the 90-day EHR reporting period.

Although the CQM reporting period is a full calendar year (CY), participants are not required to have CEHRT 2015 edition the whole year as long as they have a CEHRT 2015 edition during the EHR reporting period for a continuous 90 days. An EP does not need to have 2015 Edition CEHRT by the beginning of the CY as the CQM data from the 2015 edition CEHRT is a snapshot at the time of the attestation. The CQMs are not calculated until a report has been generated by the participant.

If participants are unsure if their CEHRT is 2015 edition or need to find a 2015 edition CEHRT, please check the Certified Health IT Products List website and don't forget to obtain your certification ID.

Tip Sheets for Objectives

New tip sheets for certain objectives will be available soon on the CORHIO website. Participants may be struggling on a certain objective/measure and are encouraged to reach out and give us your feedback on what tip sheets you'd like published. Contact the Medicaid EHR Incentive Program Coordinator at medicaidEHR@corhio.org.

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

For questions regarding program requirements, eligibility and Meaningful Use, contact:

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Medicaid Program Point of Contact and Partnerships
The Department of Health Care 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.