



PROGRAM UPDATE

August 30, 2021

Security Risk Analysis Common Questions

Congratulations to the 300 eligible professionals (EPs) who successfully attested to Program Year (PY) 2021! The deadline for PY 2021 has passed and many attestations were submitted without supporting documentation for Objective 1, Protect Patient Health Information. The Centers for Medicare and Medicaid Services (CMS) allowed Medicaid state agencies flexibility on Objective 1 allowing EPs to submit a Security Risk Analysis (SRA) after submission of their PY 2021 attestation.

The Colorado Department of Health Care Policy and Financing (the Department) will allow EPs to upload their SRA on or before December 31, 2021. With this deadline set, the key topic of questions coming to the Department through email this month were centered around the Security Risk Analysis (Objective 1) and flexibility for Program Year 2021 eligible professionals (EPs).

Although Colorado has completed the final year in the Medicaid EHR Incentive Program, participant questions regarding the SRA have been ongoing. To help bring clarity to EPs concerning the SRA, some Frequently Asked Questions (FAQs) are below.

Q: If an EP has not completed their SRA but has submitted a Program Year 2021 attestation, will the incentive payment be recouped?

A: The PY 2021 Medicaid EHR Incentive payment *will not* be recouped if EPs follow the two steps below.

1. Complete an SRA that covers the continuous 90-day meaningful use (MU) period in calendar year 2021 on or before December 31, 2021.
2. Upload the completed SRA to the submitted attestation for PY 2021 on or before December 31, 2021.

Q: How do EPs upload an SRA after submitting a PY 2021 attestation?

A: Watch the webinar "[Security Risk Analysis and Sunset Information](#)" to learn how to upload the SRA after submission of the PY 2021 attestation.

Q: What will happen if an EP has completed their SRA but did not upload the document to the PY 2021 attestation on or before December 31, 2021?

A: The Department will recoup the PY 2021 incentive payment if an SRA is not completed and uploaded to the PY 2021 attestation on or before December 31, 2021. The Department has communicated to participants of the Medicaid EHR Incentive Program that ***no exceptions*** will be permitted if the SRA is not uploaded by the deadline date.



COLORADO MEDICAID EHR INCENTIVE PROGRAM

PROGRAM UPDATE

Audit Reminders

The Medicaid EHR Incentive Program has concluded its final program year. All pre-payment audits have been completed for PY 2021—proving to be very successful for all participating EPs. The State appointed accountants, Myers and Stauffer LC, (MSLC) will now shift their focus on making sure all final program year attestations have a completed SRA uploaded to the MAPIR system (also known as the CO R&A) on or before December 31, 2021.

Post-Payment Audits

As a reminder, the Department has postponed PY 2019, PY 2020 and PY 2021 post-payment audits until state fiscal year 2022. The Medicaid EHR Incentive Program newsletter will announce when post-payment audits will begin.

The Department, CORHIO or MSLC may send communications to participants during the audit process, and it is recommended to keep a watchful eye on your email inbox, clutter or junk folders and respond in a timely manner. All participants are expected to retain documentation used during the attestation process for **all** program years for a minimum of seven years from the date of attestation in preparation for post-payment review. Being prepared will help tremendously in getting through the audit process.

Appreciation

The Department and CORHIO would like to extend its appreciation to all EPs, Eligible Hospitals, Critical Access Hospitals, Federally Qualified Health Centers, Rural Health Centers, Administrators, Office Managers, Staff and many more who worked tirelessly to attest to the Medicaid EHR Incentive Program and in doing so, promoted interoperability in Colorado. In addition to contributing to improving patient care for our most vulnerable population.

Over the past several PYs, several MAPIR system testers helped the Department and CORHIO, easing the transition to beginning a new PY for other attestors. Thank you for your assistance throughout the Medicaid EHR Incentive Program.

Medicaid EHR Program Resources by the Numbers

CORHIO, in partnership with the State, is proud to have supported our Colorado Medicaid EHR Incentive Program participants with phone and email support, educational events and webinars. In support of participants, many webinars were created and 3,194 views were documented. Furthermore, six in-person events were produced giving participants the knowledge to attest confidently and ask questions live. CORHIO responded to over 3,000 phone calls and 11,643 emails to facilitate participants attesting to the program. With each new program year new workbooks, overview and tips sheets were made to help prepare participants to successfully attest and receive incentive payments.

Resources

The [CORHIO website](#) has all PY 2019, PY 2020 and PY 2021 resources available for participants in preparation of post-payment audits. All PY 2021 webinars will be accessible including [Security Risk Analysis and Sunsetting Information](#) webinar focusing on SRA uploading and submission.



COLORADO MEDICAID EHR INCENTIVE PROGRAM

PROGRAM UPDATE



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 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, EOs, 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.