COLORADO MEDICAID EHR INCENTIVE PROGRAM

PROGRAM UPDATE

October 12, 2020

New Specification Sheets for PY 2020 and PY 2021

The Centers for Medicare and Medicaid Services (CMS) have released the spec-sheets which outline program objectives for Program Year (PY) 2020 and PY 2021. CMS announced that both program years will have the same requirements. To view the new spec sheets please follow this link.

SRA Requirement for Program Year 2020

Under federal regulations, program participants must attest to having completed a Security Risk Assessment (SRA) at least once per calendar year (CY). The SRA must meet the requirements in 45 CFR 164.308. The requirements state that the security analysis must review the Certified Electronic Health Record Technology used during the entire 90-day reporting period. The SRA must be completed on or after the Meaningful Use (MU) reporting period and no later than December 31, 2020.

Below are example dates to follow when conducting the SRA.

Program Year	MU Reporting Period	When do I complete the Annual SRA?
2020	1/1/2020 - 3/31/2020	3/31/2020 - 12/31/2020
2020	4/1/2020 - 6/30/2020	6/30/2020 - 12/31/2020
2020	7/1/2020 - 9/20/2020	9/29/2020 - 12/31/2020
2020	10/1/2020 -12/30/2020	12/30/2020 -12/31/2020

*It is acceptable for the security risk analysis to be conducted outside the EHR reporting period; however, the analysis must be unique for each EHR reporting period, the scope must include the full EHR reporting period, and it must be conducted within the calendar year of the EHR reporting period per CMS.

SRA Requirement for Program Year 2021

Due to a shortened timeframe for accepting attestations for PY 2021, CMS changed Objective 1, Protect Patient Electronic Health Information, to allow participants to submit an attestation prior to conducting their annual SRA. To qualify for an incentive payment, an SRA must be conducted during CY 2021 and provide the required documentation, even if it is completed after the participant attests to the state. A participant who has not completed an SRA by the time they attest will be required to attest that they will complete one by December 31, 2021 and are required to update their attestation with the SRA supporting documentation by December 31, 2021.

If you choose to attest prior to conducting a security risk assessment:

- You will be required to confirm that you will complete the SRA by December 31, 2021.

Program Years 2020 and 2021 Opening Dates
Timeline – Colorado Medicaid EHR Incentive Program

• Program Year 2020 opens January 15, 2021 and closes April 13, 2021

• Program Year 2021 opens May 10, 2021 and closes August 8, 2021

*Please remember to update your registration for the Medicaid EHR Incentive Program at The Centers for Medicare and Medicaid Services (CMS).

- Your payment will be held until you have updated your attestation with the SRA completion date and uploaded acceptable supporting documentation.
- To receive your 2021 payment, you can return to the MAPIR system (also known as the CO R&A) and upload after submission to the system on or before December 31, 2021.

New Health IT SRA Tool

As mentioned prior, according to the standards outlined for Objective 1, participants in the Medicaid EHR Incentive Program must conduct or review an SRA for each reporting period. In doing so, this will ensure the privacy and security of patients' electronic protected health information (ePHI), thus meeting the objective requirements.

Many participants are under the impression that an outside party must be hired to conduct or review their SRA. Although you can do this, many participants find it restrictive both financially and in time spent. Fortunately, The Office of the National Coordinator for Health Information Technology (ONC) website offers an online tool to walk you through conducting your own SRA. The Department of Health Care and Policy and Financing (the Department) recommends participants that are completing their own SRA's use this resource. The ONC, in partnership with the Office for Civil Rights (OCR) have released this updated HHS Security Risk Assessment (SRA) Tool.

The below section highlights the many new features of the updated SRA Tool 3.2 designed to help support small to medium sized health care organizations access security risks.

- Flexible section navigation allowing users to jump between sections of the assessment. Previously users would have to complete each section of the Assessment before another section was available.
- Improved User Interface (UI) scaling feature allows users to maximize to a full screen or re-size to work side by side with another application. The UI feature helps users work from other documents easily to transfer information into the SRA Tool.
- Risk Report export is now exportable to PDF allowing users to save and print. This new feature is available in upper right corner of the screen.
- Section Summary export is now exportable to PDF allowing users to save and print. This new feature is available in upper right corner of the screen.
- Addition of "Details" field to each question gives the user the option to add relevant information to each question.
- The new File recovery system of the SRA Tool can detect if there was an unsuccessful save and creates a backup file. The new file recovery module will help users prevent loss of work due to network or environmental issues.
- "Save As" functionality will allow users to save new information added to the SRA Tool without overwriting previous work. This new capability will allow users to review and update information to their assessment.

Program Resources

The Medicaid EHR Incentive Program newsletter continues to be a valuable resource for informing participants on program updates and tips for success. The newsletter is sent every month through the Medicaid EHR Incentive Program coordinator. If you know someone who would benefit from this newsletter, or if you would like to sign up to receive it, email your name and organization name to medicaidEHR@corhio.org or call (720) 285-3232.

The [CORHIO](#) website also continues to provide documentation and information regarding upcoming program years. Please look for new PY 2020 workbooks, tip sheets and webinars coming soon.

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, 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.