



ISSUE DATE December 2, 2011	EFFECTIVE DATE October 1, 2011	NUMBER 01-11-54
SUBJECT Medical Assistance Electronic Health Record (EHR) Incentive Program Year 2 for Eligible Hospitals (EH)	BY  Vincent D. Gordon, Deputy Secretary Office of Medical Assistance Programs	

IMPORTANT REMINDER: If you submit HIPAA compliant electronic healthcare claim transactions to the Department, you need to be prepared for the ANSI X12 v5010 and NCPDP vD.0 upgrades in order to prevent the rejection of your claims. The CMS mandated compliance date for all covered entities to use the new standards is January 1, 2012. For additional information, visit the DPW website at:
<http://www.dpw.state.pa.us/provider/doingbusinesswithdpw/softwareandservicevendors/hipaa5010d.0upgradeinformation/index.htm>

PURPOSE:

The purpose of this bulletin is to inform hospitals about the Medicaid Electronic Health Record (EHR) Incentive Program and Program Year 2 registration, attestation, and Meaningful Use (MU) requirements process and how these requirements relate to Payment Year 1 and Payment Year 2. This bulletin will also discuss what it means to be a “dually-eligible” hospital versus a Medicaid only hospital for the EHR Incentive Program.

SCOPE:

This bulletin applies to all inpatient acute care hospitals including critical access hospitals (CAHs) and children’s hospitals eligible for participation in the EHR Incentive Program that are enrolled in the Pennsylvania Medical Assistance (MA) Program.

BACKGROUND:

On May 13, 2011, the MA Program issued MA Bulletin 01-11-05, titled “Medical Assistance Electronic Health Record (EHR) Incentive Program for Eligible Hospitals (EH)”, to inform hospitals about the application process to register for, and participate in the EHR Incentive Program in Pennsylvania.

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:

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Visit the Office of Medical Assistance Programs Web site at
<http://www.dpw.state.pa.us/provider/healthcaremedicalassistance/index.htm>

The goal of the EHR Incentive Program is to promote the adoption and MU of certified EHR systems within the healthcare system. Please refer to MA Bulletin 01-11-05 for more information on Program eligibility requirements.

DISCUSSION:

Pennsylvania's EHR Incentive Program launched on June 6, 2011 and runs through September 30, 2021. Eligible hospitals can begin receiving payments in any year from federal fiscal year 2011 to federal fiscal year 2016; however, the last year an eligible hospital can begin to receive a Medicaid Incentive Program payment is federal fiscal 2016.

The EHR Incentive Program has two timeframes that are used in the administration of the Program; program year and payment year. The program year is used to define timeframes for submission of data used to determine eligibility. The first program year ended on September 30, 2011. Program Year 2 began October 1, 2011, and runs through September 30, 2012 for all eligible hospitals. Payment year defines the number of payments that have been made to an eligible hospital. Payment Year 1 is the first year an eligible hospital receives an incentive payment, regardless of what program year is in effect. Eligible hospitals can still participate in Program Year 1, Payment Year 1 through December 30, 2011. This 90-day period from the official end of Program Year 1 is considered the "grace period". Payment Year 2 is the second payment year an eligible hospital successfully attests and receives an incentive payment, regardless of the program year that is in effect.

Hospitals may be eligible for an incentive payment from both the Medicaid EHR Incentive Program and the Medicare EHR Incentive Program. An eligible hospital that is a meaningful EHR user under the Medicare EHR Incentive Program is deemed to be a meaningful user for Medicaid. For additional information on Program eligibility status, please visit the 'Eligibility' section found at the CMS EHR Incentive Program web site that is provided as a link in the attachment section of this bulletin. Hospitals that are eligible for EHR incentive payments under both Medicare and Medicaid should select "Both Medicare and Medicaid" during the initial registration process at the CMS Registration & Attestation site (R&A), regardless if they plan to apply for a Medicaid EHR incentive payment.

Eligible hospitals will only need to register at the CMS R&A if they are registering for their first payment year or if any of the information they submitted to the R&A in their first payment year has changed. Please refer to MA Bulletin 01-11-05 and/or the CMS R&A link in the attachment section of this bulletin for more information on Program registration and attestation.

Eligible hospitals (i.e. a children's hospital) that are applying only for Medicaid for their second payment year must apply directly at the PROMISe™ Provider Portal. Please refer to the PROMISe™ Provider Portal link in the attachment section of this bulletin for further information on applying for the EHR Incentive Program payment.

A change for Program Year 2 of the Medicaid EHR Incentive Program for eligible hospitals is the ability to attest to meeting the meaningful use standards. Examples of MU standards include:

1. The use of a certified EHR in a meaningful manner, such as e-prescribing.
2. The use of certified EHR technology for electronic exchange of health information to improve quality of health care.
3. The use of certified EHR technology to submit clinical quality and other measures.

Eligible hospitals will need to attest that they are using federally certified EHR technology in ways that can be measured significantly in quality and in quantity. The criteria for MU will be staged in three steps over the course of the next five years. Stage 1 sets the baseline for electronic data capture and information sharing. There will be three areas of MU that eligible hospitals must attest to; Core Measures, Menu Measures, and Clinical Quality Measures (description below). Stage 2 and Stage 3 are yet to be defined.

- Core Measures: Must pass or have exclusions for all 14 Measures.
- Menu Measures: Must pass or have exclusions for 5 of 10 Measures. Of the 10 Menu Measures, 3 of them are Public Health Measures. Of the 3 Public Health Measures, the hospital must pass or have an exclusion for at least one of them.
- Clinical Quality Measures: Must report on all 15 clinical quality measures.

Please note that CMS MU requirements are the same for both Medicaid and Medicare. For additional information on this subject, please refer to the corresponding MU link in the attachment section of this bulletin.

PROCEDURES AND DATES:

Medicaid only hospitals (i.e. a children's hospital) that have not received a payment:

- Eligible hospitals that did not apply for a Program Year 1 incentive payment by September 30, 2011, may participate in Program Year 1 during the attestation grace period (October 1, 2011 to December 30, 2011). If an eligible hospital is applying after September 30, 2011, the eligible hospital should respond 'Yes' to the question that asks, "Are you applying for a Program Year 1 incentive payment?" in the Medical Assistance Provider Incentive Repository (MAPIR) application if their intention is to apply for Program Year 1.
- Eligible hospitals will be able to apply for the EHR Incentive Program Year 2/Payment Year 1 incentive payment starting October 1, 2011 for Adopt, Implement or Upgrade

(AIU) only. The eligible hospital should respond 'Yes' to the question that asks, "Are you applying for a Program Year 2 incentive payment?" in the MAPIR application if they are applying for Program Year 2.

- If an eligible hospital wants to attest to 90 days of MU, they have to wait until January 3, 2012.

Medicaid only hospitals (i.e. a children's hospital) that are applying for a second payment:

- If eligible hospitals attested to AIU in their first payment year, they must attest to MU for all subsequent payments.
- Eligible hospitals will be able to apply for Program Year 2/Payment Year 2 incentive payment beginning January 3, 2012 by attesting to 90 days of MU.

Dually eligible hospitals (acute care including CAH) that have not receive a payment:

- Eligible hospitals that did not apply for a Program Year 1 incentive payment, may apply for AIU and MU in the same fiscal year. However, they must attest to AIU through Medicaid prior to attesting to 90 days of MU at the CMS R&A.
- Eligible hospitals that did not apply for a Program Year 1 incentive payment by September 30, 2011, may participate in Program Year 1 during the attestation grace period (October 1, 2011 to December 30, 2011). If an eligible hospital is applying after September 30, 2011, the eligible hospital should respond 'Yes' to the question that asks, "Are you applying for a Program Year 1 incentive payment?" in the Medical Assistance Provider Incentive Repository (MAPIR) application if their intention is to apply for Program Year 1.

Dually eligible hospitals (acute care including CAH) that have received (or will receive) a payment from Medicaid for AIU:

- If the eligible hospital completed an application in Program Year 1 using the AIU attestation, they must complete their 90 days of MU attestation through the CMS R&A.

Dually eligible hospitals (acute care including CAH) that have received (or will receive) a payment from Medicare for 90 days of MU:

- If the eligible hospital attested through the CMS Medicare Program for 90 days of MU in Program Year 1, they will need to complete 365 days of MU and attest to Medicare at the CMS R&A in Program Year 2 and therefore deemed a meaningful user for both Medicaid). Applications will be accepted for this option on October 1, 2012.

ATTACHMENTS:

General Information about EHR Incentive program including eligibility requirements:

<https://www.cms.gov/ehrincentiveprograms/>

CMS Registration and Attestation Information:

https://www.cms.gov/EHRIncentivePrograms/20_RegistrationandAttestation.asp#TopOfPage

https://www.cms.gov/EHRIncentivePrograms/32_Attestation.asp#TopOfPage

PROMISe™ Provider Portal

<https://promise.dpw.state.pa.us/portal/>

CMS MU Information:

https://www.cms.gov/EHRIncentivePrograms/30_Meaningful_Use.asp#TopOfPage

CMS Meaningful Use Attestation Calculator:

<http://www.cms.gov/apps/ehr/>

Eligible Hospital Timeline:

www.pamahealthit.org/