

PROGRAM UPDATE



January 22, 2014

*The Colorado Department of Health Care Policy and Financing (Department) continues to accept attestations for the Colorado Medicaid EHR Incentive Program. In Program Year 2012, more than **\$63 million** in incentive payments were made to eligible health care professionals and hospitals for the adoption, implementation or upgrade (AIU) and Meaningful Use (MU) of certified EHR technology and payments for Program Year 2013 already total more than **\$12 million**.*

Eligible Professional Deadline for Program Year 2013

Eligible Professionals (EPs) need to note that **March 31, 2014** is the deadline to attest to Adopting, Implementing or Upgrading (AIU) your Electronic Health Records (EHR) or to Meaningful Use (MU) of your EHR in the Colorado Registration & Attestation System.

As a reminder, the EP patient volume calculation needs to be a 90-day period from calendar year 2012 or 12 months prior to the attestation date. If you are choosing a 90-day period that is in the 12 months prior to attestation, keep in mind that this date is constantly changing and the CO R&A will not accept a start date that is more than 12 months prior to the date you begin your attestation in the CO R&A.

If you are attesting to MU, the EHR Reporting Period needs to be from calendar year 2013 only.

For resources on attesting to Meaningful Use in 2013, please visit <http://www.corhio.org/ehrs-meaningful-use.aspx>.

2014 Rings in Changes to Stage 1 Meaningful Use, Stage 2 Meaningful Use and Payment Adjustments

Happy New Year! – 2014 is ushering in many changes to the Medicaid EHR Incentive Program. Not only will some dually eligible hospitals attest to Stage 2, but 2014 also bring changes to Stage 1 Meaningful Use whether you are attesting to MU for the first time or if this is your second year. Meaningful Use Quick Reference Guides for Stage 1 and Stage 2 are available on CORHIO's EP and EH pages. For EPs, click [here](#). For EHs, click [here](#).

Whether you are attesting to AIU or MU (all stages), all EPs and EHs must be upgraded to 2014 Certified EHR Technology (CEHRT). Speak with your EHR vendor if you are not certain if you have upgraded to a 2014 CEHRT and double-check the Office of the National Coordinator's (ONC) Certified Health Product List (CHPL) [here](#). When you attest in program year 2014, you will need to prove that you have upgraded to a 2014 CEHRT.

Payment adjustments go into effect on October 1, 2014 for EHs and January 1, 2015 for EPs. What does that mean? To avoid a 1% payment adjustment on the above referenced dates to all Medicare claims, all EPs and EHs must have attested to Meaningful Use. Even if you are attesting in the Medicaid EHR Incentive Program, you may be subject to

PROGRAM UPDATE



payment adjustments on all of your Medicare patients. Please see [CMS' tip sheets](#) for EPs and EHs on payment adjustments and hardship exceptions.

Preparing for the 2014 Program Year

The 2014 program year for Colorado's Medicaid EHR Incentive Program is not yet open and, although we do not yet have a confirmed opening date, it will not be before April 1, 2014. There will be more announcements in future program updates; however, you can start preparing now by working on eligibility calculations and monitoring your MU objectives.

The eligibility rules for EPs have not changed – 30% Medicaid encounter volume from a 90-day period in the previous calendar year or 12 months prior to attestation (20% for Pediatricians).

If you are planning to attest to Meaningful Use, run reports on your EPs at least once a month to make sure that all EPs are hitting each objective. By running a report once a month, you can assess any objectives that may be below the required measurement and make adjustments.

Finally, keep in mind that EPs can skip a year (or more) and re-enter the Medicaid EHR Incentive Program without penalty. If you skip a year, you will still be subject to payment adjustments.

Necessary Documentation for Attesting

Whether you are attesting to AIU or to MU, the number of attachments and additional information required to complete an attestation can be overwhelming and very easy to overlook. CORHIO has created a [checklist](#) that can be downloaded to help remind you of the required documents. Some of the most common mistakes and the best way to correct them include:

- Whether you are attesting to AIU or to MU, proof of a Certified EHR has to be uploaded each year. Make sure you are uploading a copy of the contract/license agreement that is fully executed by both parties along with an invoice. The invoice does not need to be in full and can include installments, but proof of payment is required.
- The [Eligibility Verification Workbook](#) (or De-identified List) is used to verify all of the eligible encounters and must be filled out fully. Make sure that all Medicaid IDs are included that you used to calculate your encounter volume – this could include the rendering provider or the supervising provider, too. In addition, make sure that you are only including encounters that were billed/filed with Medicaid. These encounters can include zero-pay encounters, but if they were not filed with Medicaid, they cannot be verified.
- When you are attesting to MU, make sure that the MU Summary Report(s) that are uploaded include all of the Core and Menu objectives along with all of the Clinical Quality Measures (CQM) that you have chosen. If your certified EHR does not report on any Yes/No Objectives, obtain a letter from your vendor explaining that,

PROGRAM UPDATE



although the functionality is enabled, the report from their product does not include Yes/No Objectives. This will help eliminate any confusion during the attestation review.

If you have any questions about your attestation or about the reason why your attestation may have been placed on hold once submitted, you may always send your questions to MedicaidEHR@corhio.org.

Updated Anticipated Timeline – Colorado Medicaid EHR Incentive Program

Event	Status/Expected Date
CO R&A System begins accepting Medicaid & Medicare Meaningful Use attestations	Now Open!
CO R&A System opens for EHs to attest to Meaningful Use for FFY 2013	Now Open!
CO R&A System opens for EPs to attest to Meaningful Use for calendar year 2013	Now Open!
First incentive payments issued to EPs who successfully attested to Medicaid Stage 1 Meaningful Use	Paid!

Medicaid Program Point of Contact and Partnerships

The Department 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 will be the central point of contact for EPs, EHs, partners and other interested parties on requirements, processes and questions regarding the Medicaid EHR Incentive Program. The Medicaid EHR Incentive Program Coordinator, Tracy McDonald, can be reached at MedicaidEHR@corhio.org or 720.285.3232.

Xerox (formerly Affiliated Computer Services) has been contracted by the Department to manage the Provider Outreach Page and to provide the Colorado R&A System, including the web portal through which eligible providers can register and attest to receive the EHR incentive payments.