

PROGRAM UPDATE



December 17, 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 total more than **\$48 million** while Program Year 2014 payments total more than **\$3.1 million**.*

2014 Flexibility Rule Update for the CO R&A

The CO R&A is expected to be upgraded and ready to accept 2014 Flex Rule attestations in early January 2015. Once we have a definite date, a separate email will be sent.

In the meantime, the Department has shared examples of supporting documentation for attesting to one of the flexibility options. In addition to the required documents outlined in the CO R&A, all EPs and EHs attesting to 2013 Stage 1 objectives and measures will be required to submit one of the following:

- Vendor letter confirming software development delays,
- Vendor letter or screen shot from vendor website confirming there are missing or delayed software updates, or
- Date of software installation and upgrade to determine if time available did not allow for proper training and testing

Attesting to Menu Objectives in 2014 – Using Exclusions to Reach Meaningful Use

At the release of Stage 2 in 2012, CMS stated that if an EP needed to take an exclusion for any of the MU Menu Objectives, they were required to answer all nine instead of the required five. CMS has since changed these guidelines and suggests that all EPs attest to as many as they can before taking an exclusion; however, exclusions are allowed. The CO R&A is currently programmed to accept Menu Objectives in 2014 as per the original guidelines and will not be updated before the end of the program year.

Because all EPs must attest to one public health measure, Colorado EPs are faced with a challenge because many are still in the queue for the immunization registry integration. That challenge no longer exists because, as stated above, CMS has changed their guidelines. The challenge now exists with attesting to five Menu Objectives in the CO R&A.

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The Department has developed a work around for all EPs that need to take an exclusion on one or more of their Menu Objectives in 2014. Please note that EPs should only take exclusions where valid and should report on all Menu Objectives without exclusion if they can do so.

For an explanation and a copy of a new required document for attesting with an exclusion to Menu Objectives in 2014, [click here](#).

New CMS Guidelines for Core Measure – Protect Electronic Health Information

CMS has recently issued new guidelines on attesting to the MU Core Objective for protecting electronic health information. These guidelines are slightly different than what was published earlier this year, so please ready [FAQ 10754](#).

Simply stated, an EP who is attesting to MU with a 90-day EHR reporting period can complete the appropriate [security risk analysis requirements](#) outside of this 90-day period as long as it is completed between January 1st of the EHR reporting year and no later than the date the EP submits the attestation for that EHR reporting period.

For more information, please see the CMS [Security Risk Analysis Tipsheet](#) and, if you are a small- to medium-sized business, the ONC has developed a [tool to conduct risk assessments](#) for your organization.

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	Program Year is now closed
CO R&A System opens for EPs to attest to Meaningful Use for calendar year 2013	Program Year is now closed
First incentive payments issued to EPs who successfully attested to Medicaid Stage 1 Meaningful Use	Paid!
First incentive payments issues to EHs who successfully attested to Medicaid Stage 1 Meaningful Use	Paid!
CO R&A System opens for EHs to attest to 2014 Stage 1 and Stage 2 Meaningful Use for FFY 2014	Now Open!
CO R&A System opens for EPs to attest to 2014 Stage 1 for program year 2014	Now Open!
CO R&A System opens for EPs and EHs to attest to 2013 Stage 1 Objectives for the 2014 Flexibility Rule	January 2015



COLORADO MEDICAID EHR INCENTIVE PROGRAM

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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.