

From: Siciliano, Lorraine

Sent: Wednesday, October 22, 2014 8:46 AM

To: Siciliano, Lorraine

Subject: VT Medicaid EHRIP Updates: 2014 CEHRT Flexibility guidance; EH Grace Period and application process; Audit presentation; Payment Adjustment exception applications

To All Vermont Medicaid EHR Incentive Program participants:

The Vermont Medicaid Electronic Health Record Incentive Program (EHRIP) Team has added new content and reference links to our website: <http://hcr.vermont.gov/hit/ehrip>

Be sure to bookmark the website and visit regularly for news on the latest program developments. Added today:

CMS 2014 CEHRT FLEXIBILITY FLOW CHARTS AND GUIDANCE

If you are planning to take advantage of the CEHRT Flexibility Rule for your Program Year 2014 EHR Incentive application, CMS has issued [new tools and guidance](http://hcr.vermont.gov/hit/ehrip/2014) (<http://hcr.vermont.gov/hit/ehrip/2014>) on how to attest. The Vermont Medicaid EHRIP Team will be working to provide the version of MAPIR that will allow 2014 CEHRT Flexibility options, which will be available by early February 2015. The Grace Period to submit Program Year 2014 applications will be extended to allow providers time to attest with the new range of requirements.

CMS 2014 CEHRT Flexibility Rule Effective October 1, 2014				
Pre Flexibility Rule Scheduled MU Progression	Post Flexibility Rule MU Reporting Options	Provider's Certified EHR Technology		
		2011 CEHRT	2011 & 2014 CEHRT	2014 CEHRT
Not Participating in Program	AIU	Not an option	Not an option	YES
Stage 1 2014 Definition of MU Measures	Stage 1 2013 Definition MU Measures	YES, Reason Required	YES, Reason Required	Not an option
	Stage 1 2014 Definition MU Measures	Not an option	YES, Reason Required	YES
Stage 2 2014 Definition of MU Measures	Stage 1 2013 Definition MU Measures	YES, Reason Required*	YES, Reason Required*	Not an option
	Stage 2 2014 Definition MU Measures	Not an option	YES, Reason Required	YES
	Stage 1 2014 Definition MU Measures	Not an option	YES, Reason Required*	YES, Reason Required*

Providers will need to attest to at least one reason for the delay in implementing 2014 CEHRT. CMS has indicated what it allows as "Acceptable" and "Unacceptable" reasons for **NOT** being able to fully implement 2014 CEHRT.

ACCEPTABLE REASONS FOR A PROVIDER'S INABILITY TO FULLY IMPLEMENT A 2014 EDITION CEHRT

- Software development delays
- Missing or delayed software updates
- Being able to implement 2014 CEHRT for part of the reporting period (not the full reporting period)
- Unable to train staff, test the updates system, or put new workflows in place due to delay with installation of 2014 CEHRT
- Cannot meet Stage 2 Summary of Care measures due to the recipient of their Summary of Care transmittal being impacted by 2014 CEHRT issues. The sending provider may experience significant difficulty meeting the 10% threshold for electronic transmissions, despite the referring provider's ability to send the electronic document, if the intermediary or the recipient of the transition or referral is experiencing delays in the ability to fully implement 2014 Edition CEHRT.

UNACCEPTABLE REASONS FOR A PROVIDER'S INABILITY TO FULLY IMPLEMENT A 2014 EDITION CEHRT

- Financial issues - Cost of Implementing, upgrading, installing, testing, or other similar financial issues.
- Inability to meet one or more measures for reasons unrelated to implementation challenges
- Staff turnover and change
- Provider waited too long to engage a vendor
- Refusal to purchase the requisite software
- Providers who fully implemented 2014 Edition CEHRT and can report in 2014
- If over 50% percent of the EP's patient encounters during the EHR reporting period occur at locations equipped with 2014 Edition CEHRT which has been fully implemented, the EP should limit their denominators to only those patient encounters in locations equipped with fully implemented 2014 Edition CEHRT.

More information about the 2014 CEHRT Flexibility, and links to CMS resources are available at our website:

<http://hcr.vermont.gov/hit/ehrip/2014>

ELIGIBLE HOSPITAL GRACE PERIOD AND APPLICATION PROCESS

Program Year 2015 began on October 1, 2014 for Eligible Hospitals (EHs). EHs are now in the Grace Period for attesting to Program Year 2014. Because of the new CMS Flexibility final rule, Vermont has requested that the Grace Period extend beyond the 60-day deadline. When we receive the CMS approval for this grace period extension, we will let you know. Reminder: Dually-eligible hospitals need to attest for Meaningful Use through the CMS Medicare EHRIP first, and then attest to the Medicaid program.

VT MEDICAID EHRIP AUDIT GUIDANCE

At the [Vermont Blueprint for Health](http://hcr.vermont.gov/blueprint) (<http://hcr.vermont.gov/blueprint>) Semi-Annual Conference held October 20, 2014, Vermont EHR Incentive Program Auditor **Heather EJ Kendall** gave a presentation on *Vermont Medicaid EHR Incentive Program Audits*. You can download her presentation [here](http://hcr.vermont.gov/sites/hcr/files/pdfs/BP_SemiAnnualConf/VTMedicaidEHRIncentiveProgramAudits.pdf) (http://hcr.vermont.gov/sites/hcr/files/pdfs/BP_SemiAnnualConf/VTMedicaidEHRIncentiveProgramAudits.pdf).

REMINDER - HARDSHIP EXCEPTION APPLICATIONS TO AVOID THE 2015 MEDICARE PAYMENT

ADJUSTMENT DUE 11/30/14

CMS announced that it is **reopening** the submission period for hardship exception applications for eligible professionals and eligible hospitals to avoid the 2015 Medicare payment adjustments for not demonstrating meaningful use of Certified Electronic Health Record Technology (CEHRT). The new deadline will be **November 30, 2014**. Previously, the hardship exception application deadline was April 1, 2014 for eligible hospitals and July 1, 2014 for eligible professionals.

Visit the CMS [Payment Adjustments and Hardship Exceptions webpage](http://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/PaymentAdj_Hardship.html) (http://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/PaymentAdj_Hardship.html) for more information about Medicare EHR Incentive Program payment adjustments.

Please do not hesitate to contact the EHRIP Team with any questions: ehrip-support@vitl.net

Thank you,
Lorraine

Lorraine Siciliano
Medicaid Operations Administrator
Electronic Health Records Incentive Program
Department of Vermont Health Access
(802) 363-4652
Lorraine.Siciliano@state.vt.us