

Table 6: Pre-screening and Post-payment Audit Criteria for MDAAP Tracks and Milestones

Track #1	Milestone #1	Attestation Requirement		
Implement certified EHR technology (CEHRT)	Signed Participation Agreement to Implement certified EHR technology (CEHRT)	<p style="text-align: center;"><u>YES / NO</u></p> Providers must attest YES to signing a participation agreement to receive technical assistance and program support to implement certified electronic health record technology (CEHRT), and begin engagement with the MDAAP technical assistance/program support team within 30 days of the participation agreement being signed by all parties.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of signed participation agreement	<ul style="list-style-type: none"> Copy of signed participation agreement to implement CEHRT 	Obtain and review a copy of the signed participation agreement to implement CEHRT. Look for correct practice name, address, signatures, and date.		Pre-screening and applications selected for post-payment audit
Track #1	Milestone #2	Attestation Requirement		
Implement certified EHR technology (CEHRT)	Signed Scope of Services Agreement to Implement CEHRT	<p style="text-align: center;"><u>YES / NO</u></p> Providers must attest YES to signing a scope of services agreement to define the suite of technical assistance/program support services that will be provided to the practice to successfully achieve the objectives of the MDAAP for the Implement certified electronic health record technology (CEHRT) track.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of signed scope of services agreement	<ul style="list-style-type: none"> Copy of signed scope of services agreement for the Implement CEHRT track 	Obtain and review a copy of the signed scope of services agreement to implement CEHRT. Look for correct practice name, address, signatures, and date.		Pre-screening and applications selected for post-payment audit
Track #1	Milestone #3	Attestation Requirement		

Implement certified EHR technology (CEHRT)	New 2015 Cures Edition CEHRT technology purchase	<p style="text-align: center;"><u>YES / NO</u></p> <p style="text-align: center;">Providers must attest YES to purchasing new Office of the National Coordinator for Health Information Technology (ONC) defined 2015 Cures Edition Update certified EHR technology (CEHRT) on or after October 1, 2022.</p> <p style="text-align: center;">One User License / Two to Nine User Licenses / Ten Plus User Licenses</p> <p style="text-align: center;">Providers must attest to the number/range of user licenses they are purchasing for their 2015 Cures Edition CEHRT. Incentive payment amounts for this milestone will be adjusted based on the number of licenses purchased.</p>		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of new CEHRT technology purchase on or after October 1, 2022.	<ul style="list-style-type: none"> • Contract/executed vendor agreement • CEHRT vendor documentation 	<p>Obtain and review the supporting documentation that shows a legal and/or financial commitment to a 2015 Cures Edition certified EHR system, such as a copy of the contract or executed vendor agreement.</p> <p>Look for correct practice name, address, signatures, and date.</p>		Pre-screening and applications selected for post-payment audit
Evidence EHR is certified to ONC 2015 Edition Cures Update Base EHR definition	<ul style="list-style-type: none"> • EHR certification ID from provider or vendor documentation • ONC CHPL Certified Health IT website 	<p>For providers implementing new CEHRT, evaluate the 15-character CMS EHR Certification ID and verify it is certified to the ONC 2015 Edition Cures Update Base EHR definition. Use the CMS ID Reverse Lookup at the ONC CHPL Certified Health IT website: https://chpl.healthit.gov/#/resources/cms-lookup</p>		Pre-screening and applications selected for post-payment audit
Evidence new CEHRT includes technology and/or modules that support connectivity to the VT HIE and sending clinical and encounter information	<ul style="list-style-type: none"> • CEHRT vendor documentation • ONC CHPL Certified Health IT website 	<p>Obtain and review documentation that shows the new CEHRT includes technology or modules that support connectivity to the VT HIE and sending clinical and encounter information to the VT HIE, such as EHR vendor documentation. If needed, the ONC CHPL Certified Health IT website can be used to verify certification of criteria/functionality (https://chpl.healthit.gov/#/search).</p>		Pre-screening and applications selected for post-payment audit

Evidence of the number of user licenses purchased for new 2015 Cures Edition CEHRT	<ul style="list-style-type: none"> Executed CEHRT vendor agreement CEHRT vendor documentation 	Obtain and review documentation that shows the number of user licenses purchased for new 2015 Cures Edition CEHRT, such as vendor agreement/contract. Compare the number of user licenses listed on the vendor documentation to the attested number or user licenses.		Pre-screening and applications selected for post-payment audit
Track #1	Milestone #4	Attestation Requirement		
Implement certified EHR technology (CEHRT)	New 2015 Cures Edition CEHRT Go-Live	<p style="text-align: center;">YES / NO</p> Providers must attest YES to completing new 2015 Cures Edition CEHRT go-live checklist.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence the provider completed the go-live checklist for their 2015 Cures Edition CEHRT	<ul style="list-style-type: none"> Go-live checklist signed by the business support vendor Attestation by MDAAP business support vendor/resource 	Obtain evidence the new 2015 Cures Edition CEHRT has gone live, such as an attestation signed by the business support vendor/resource that the go-live checklist has been completed.		Pre-screening and applications selected for post-payment audit
Track #1	Milestone #5	Attestation Requirement		
Implement certified EHR technology (CEHRT)	Provider has completed VITL Access credentialing, training, and usage for at least one client, on or after October 1, 2022.	<p style="text-align: center;">YES / NO</p> VITL Access is a secure internet portal which provides authorized users, with proper patient consent, a patient-centered view of the personal health information available through the Vermont Health Information Exchange (VHIE). Providers must attest YES to VITL Access credentialing, training, and usage for at least one client, on or after October 1, 2022.		
		<p style="text-align: center;">One New VITL Access User / Two to Nine New VITL Access Users / Ten Plus New VITL Access Users</p> Providers must attest to the number/range of new, credentialed, and trained users for VITL Access. Incentive payment amounts for this milestone will be adjusted based on the number of new VITL Access users.		

Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
<p>For providers attesting as group practice/facility, evidence VITL Access has been used by at least one authorized person at the practice on or after October 1, 2022, and for individual providers attesting as a solo provider, evidence VITL Access has been used by the attesting provider on or after October 1, 2022.</p>	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming VITL Access usage on or after October 1, 2022 	<p>Obtain evidence showing the provider has used VITL Access for at least one client, on or after October 1, 2022, such as an email, letter, or other communication from VITL confirming VITL Access users for the organization.</p>		<p>Pre-screening and applications selected for post-payment audit.</p>
<p>Evidence of the number of new VITL Access users at the practice/organization.</p>	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming VITL Access usage on or after October 1, 2022 	<p>Obtain and review documentation that shows the number of new VITL Access users at the organization, such as an email, letter, or other communication from VITL confirming VITL Access users for the organization. Compare the number of VITL Access users listed on the VITL documentation to the attested number of new VITL Access users.</p>		<p>Pre-screening and applications selected for post-payment audit</p>
<p>Track #1</p>	<p>Milestone #6</p>	<p>Attestation Requirement</p>		

Implement certified EHR technology (CEHRT)	Use the VITL SRA documentation template and conduct or review a security risk analysis in accordance with the requirements under 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI data created or maintained by certified electronic health record technology (CEHRT) or other eligible program-defined technology, in accordance with requirements in 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), implement security updates as necessary and correct identified security deficiencies as part of the MDAAP eligible provider's risk management process.	<u>YES / NO</u> Providers must attest YES to using the VITL security risk assessment (SRA) documentation template and conducting or reviewing a security risk analysis and implementing security updates as needed and correcting identified security deficiencies to meet this measure within 12 months prior to the date of attestation for this milestone.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
A security risk analysis (SRA) was reviewed or completed in accordance with the requirements within 12 months prior to the date of attestation for this milestone, using the VITL SRA template.	<ul style="list-style-type: none"> Completed VITL SRA template Review of documentation – a copy of the security analysis conducted (including findings and recommendations) 	Inquire and obtain evidence of the criteria used for the security risk assessment (SRA) by obtaining documentation of procedures and steps performed during the analysis. Providers are required to complete the VITL SRA template. The two chief elements that should be reviewed are the asset inventory and a final report. The asset inventory will demonstrate that the practice identified the type, location, the responsible person, and whether or not the asset contained PHI. The asset inventory is a critical step as it defines the scope of the SRA. The final report identifies the risks; it should be dated and identify the organization/practice for	Date of attestation for SRA milestone: Date SRA/review:	45 CFR 164.308(a)(1), 45 CFR 164.312(a)(2)(iv), and 45 CFR 164.306(d)(3) Pre-screening and applications selected for post-payment audit

		<p>which the SRA was done. A letter from a vendor stating the assessment was done is not sufficient. A redacted assessment is not acceptable.</p> <p>The security risk analysis must be conducted within 12 months prior to the date of attestation for the MDAAP SRA milestone.</p> <p>Obtain evidence the security risk analysis addressing encryption/security of data was performed at least once.</p> <p>Obtain evidence that the deficiencies noted during the assessment have been documented.</p>		
Required security updates and deficiencies have been addressed	<ul style="list-style-type: none"> Corrective action plan 	<p>Inquire and obtain the remediation plan based on the risks identified by the assessment. Ensure plan includes responsible parties and time frames.</p> <p>Determine what components of the Corrective Action Plan (CAP) have been implemented and the planned implementation of the remaining CAP. It is not necessary that all deficiencies be mitigated at the time of attestation, but there should be a plan in place.</p>		Pre-screening and applications selected for post-payment audit
Track #1	Milestone #7	Attestation Requirement		
Implement certified EHR technology (CEHRT)	The provider has a vendor contract for an Admit, Discharge, Transfer (ADT) interface for their CEHRT.	<p style="text-align: center;"><u>YES / NO</u></p> <p>Providers must attest YES to having a vendor contract for an Admit, Discharge, Transfer (ADT) interface for their CEHRT on or after October 1, 2022</p>		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of vendor contract for CEHRT ADT interface	<ul style="list-style-type: none"> Executed EHR vendor SOW Executed Vermont Health Information Exchange (VHIE) 	Obtain and review documentation that shows the provider/practice has a vendor contract for an ADT interface for their CEHRT on or after October 1, 2022, such as a copy of the executed EHR vendor statement of work (SOW) spelling out the specific interfaces in		Pre-screening and applications selected for post-payment audit

	Services Agreement with VITL	scope, and a copy of the executed VHIE services agreement with VITL. Look for correct practice name, signatures, and date.		
Track #1	Milestone #8	Attestation Requirement		
Implement certified EHR technology (CEHRT)	The provider has a vendor contract for a Continuity of Care Document (CCD) interface for their CEHRT.	<u>YES / NO</u> Providers must attest YES to having a vendor contract for a Continuity of Care Document (CCD) interface for their CEHRT on or after October 1, 2022		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of vendor contract for CEHRT CCD interface	<ul style="list-style-type: none"> Executed EHR vendor SOW Executed Vermont Health Information Exchange (VHIE) Services Agreement with VITL 	<p>Obtain and review documentation that shows the provider/practice has a vendor contract for a CCD interface for their CEHRT on or after October 1, 2022, such as a copy of the executed EHR vendor statement of work (SOW) spelling out the specific interfaces in scope, and a copy of the executed VHIE services agreement with VITL.</p> <p>Look for correct practice name, signatures, and date.</p>		Pre-screening and applications selected for post-payment audit
Track #1	Milestone #9	Attestation Requirement		
Implement certified EHR technology (CEHRT)	The provider has achieved Go-Live on or after October 1, 2022, and is sending production encounter data (ADT) to VITL, the operator of Vermont's Health Information Exchange (VHIE), using CEHRT, except where prohibited and in	<u>YES / NO</u> Providers must attest YES to Go-live and electronically submitting production encounter data (Admit, Transfer, Discharge (ADT)) to the Vermont Health Information Exchange (VHIE) on or after October 1, 2022, using CEHRT.		

	accordance with applicable law and practice.			
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Proof of provider Go-live and sending electronic production level encounter data (ADT) to VITL on or after October 1, 2022.	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming Go-Live and production data being sent VITL connectivity dashboard report provided to the state as deliverable VITL attestation of provider/practice Go-Live/production data being sent to the VHIE 	Obtain evidence showing Go-Live and ongoing submission of encounter data (ADT) from the Provider's practice to the VHIE, on or after October 1, 2022, such as email from VITL containing Go-Live date or stating production data is being sent, VITL attestation, VITL connectivity dashboard, or written verification by VITL project lead that ADT interface has been successfully moved from the Test Environment to the Production Environment and are sending production messages.		Pre-screening and applications selected for post-payment audit
Track #1	Milestone #10	Attestation Requirement		
Implement certified EHR technology (CEHRT)	The provider has achieved Go-Live on or after October 1, 2022, and is sending production clinical data (CCD) to VITL, the operator of Vermont's Health Information Exchange (VHIE), using CEHRT, except where prohibited and in accordance with applicable law and practice.	<p style="text-align: center;"><u>YES / NO</u></p> <p>Providers must attest YES to Go-live and electronically submitting production clinical data (Continuity of Care Document (CCD)) to Vermont Health Information Exchange (VHIE) on or after October 1, 2022, using CEHRT.</p>		

Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Proof of provider Go-live and sending electronic production level clinical data (CCD) to VITL on or after October 1, 2022	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming Go-Live and production data being sent VITL connectivity dashboard report provided to the state as deliverable VITL attestation of provider/practice Go-Live/production data being sent to the VHIE 	Obtain evidence showing Go-Live and ongoing submission of clinical data (CCD) from the Provider's practice to the VHIE, on or after October 1, 2022, such as email from VITL containing Go-Live date or stating production data is being sent, VITL attestation, VITL connectivity dashboard, or written verification by VITL project lead that ADT interface has been successfully moved from the Test Environment to the Production Environment and are sending production messages.		Pre-screening and applications selected for post-payment audit
Track #2	Milestone #1	Attestation Requirement		
No EHR to Non-CEHRT Electronic Program-Eligible System	Signed Participation Agreement to implement new program-eligible non-CEHRT	<u>YES / NO</u> Providers must attest YES to signing a participation agreement to receive technical assistance and program support to implement new HITRUST-certified technology (not ONC certified electronic health record technology), and begin engagement with the MDAAP technical assistance/program support team within 30 days of the participation agreement being signed by all parties.		
Milestone Documentation Requirement	Possible Data Sources	Audit Procedures	Result/Calculations	W/P Reference
Evidence of signed participation agreement	Copy of signed participation agreement to implement new program-eligible non-CEHRT, that is HITRUST certified	Obtain and review a copy of the signed participation agreement to implement new program-eligible non-CEHRT that is HITRUST certified. Look for correct practice name, address, signatures, and date.		Pre-screening and applications selected for post-payment audit
Track #2	Milestone #2	Attestation Requirement		

No EHR to Non-CEHRT Electronic Program-Eligible System	Signed Scope of Services Agreement to Implement new program-eligible non-CEHRT	<u>YES / NO</u> Providers must attest YES to signing a scope of services agreement to define the suite of technical assistance/program support services that will be provided to the practice to successfully achieve the objectives of the MDAAP for the 'No EHR to Non-CEHRT Electronic Program-Eligible System' track.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of signed scope of services agreement	<ul style="list-style-type: none"> Copy of signed scope of services agreement for the No EHR to HITRUST-certified technology, Non-CEHRT track 	<p>Obtain and review a copy of the signed scope of services agreement to implement new program-eligible non-CEHRT that is HITRUST certified.</p> <p>Look for correct practice name, address, signatures, and date.</p>		Pre-screening and applications selected for post-payment audit
Track #2	Milestone #3	Attestation Requirement		
No EHR to Non-CEHRT Electronic Program-Eligible System	New electronic program-eligible technology purchase (non-CEHRT) and go-live checklist	<p>Providers must attest YES to purchasing new HITRUST-certified technology (not ONC certified EHR technology) and completing the go-live checklist on or after October 1, 2022.</p> <p style="text-align: center;">One User License / Two to Nine User Licenses / Ten Plus User Licenses</p> <p>Providers must attest to the number/range of user licenses they are purchasing for their new HITRUST-certified technology. Incentive payment amounts for this milestone will be adjusted based on the number of licenses purchased.</p>		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of new program-eligible non-CEHRT technology purchase on or after October 1, 2022, and evidence the provider completed	<ul style="list-style-type: none"> Contract/executed vendor agreement Program-eligible non-CEHRT vendor documentation Go-live checklist signed by the business support vendor 	Obtain and review the supporting documentation that shows a legal and/or financial commitment to a new HITRUST-certified (non-ONC CEHRT) system, such as a copy of the contract or executed vendor agreement containing vendor-supplied documentation of active HITRUST Common Security Framework (CSF) certification, as maintained by the HITRUST Alliance, https://hitrustalliance.net .		Pre-screening and applications selected for post-payment audit

the go-live checklist for their technology	<ul style="list-style-type: none"> Attestation by MDAAP business support vendor/resource 	<p>Look for correct practice name, address, signatures, and date.</p> <p>Obtain evidence the new technology has gone live, such as an attestation signed by the business support vendor/resource that the go-live checklist has been completed.</p>		
Evidence of the number of user licenses purchased for new program-eligible non-CEHRT	<ul style="list-style-type: none"> Executed program-eligible non-CEHRT vendor agreement Program-eligible non-CEHRT vendor documentation 	<p>Obtain and review documentation that shows the number of user licenses purchased for new program-eligible (HITRUST-certified) non-CEHRT, such as vendor agreement/contract. Compare the number of user licenses listed on the vendor documentation to the attested number or user licenses.</p>		Pre-screening and applications selected for post-payment audit
Track #2	Milestone #4	Attestation Requirement		
No EHR to Non-CEHRT Electronic Program-Eligible System	<p>Use the VITL SRA documentation template and conduct or review a security risk analysis in accordance with the requirements under 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI data created or maintained by certified electronic health record technology (CEHRT) or other eligible program-defined technology, in accordance with requirements in 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), implement security updates as necessary and correct identified security deficiencies as part of the MDAAP</p>	<p style="text-align: center;"><u>YES / NO</u></p> <p>Providers must attest YES to using the VITL security risk assessment (SRA) documentation template and conducting or reviewing a security risk analysis and implementing security updates as needed and correcting identified security deficiencies to meet this measure within 12 months prior to the date of attestation for this milestone.</p>		

	eligible provider's risk management process.			
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
A security risk analysis (SRA) was reviewed or completed in accordance with the requirements within 12 months prior to the date of attestation for this milestone, using the VITL SRA template.	<ul style="list-style-type: none"> Completed VITL SRA template Review of documentation – a copy of the security analysis conducted (including findings and recommendations) 	<p>Inquire and obtain evidence of the criteria used for the security risk assessment (SRA) by obtaining documentation of procedures and steps performed during the analysis. Providers are required to complete the VITL SRA template. The two chief elements that should be reviewed are the asset inventory and a final report. The asset inventory will demonstrate that the practice identified the type, location, the responsible person, and whether or not the asset contained PHI. The asset inventory is a critical step as it defines the scope of the SRA. The final report identifies the risks; it should be dated and identify the organization/practice for which the SRA was done. A letter from a vendor stating the assessment was done is not sufficient. A redacted assessment is not acceptable.</p> <p>The security risk analysis must be conducted within 12 months prior to the date of attestation for the MDAAP SRA milestone.</p> <p>Obtain evidence the security risk analysis addressing encryption/security of data was performed at least once.</p> <p>Obtain evidence that the deficiencies noted during the assessment have been documented.</p>	<p>Date of attestation for SRA milestone:</p> <p>Date SRA/review:</p>	<p>45 CFR 164.308(a)(1), 45 CFR 164.312(a)(2)(iv), and 45 CFR 164.306(d)(3)</p> <p>Pre-screening and applications selected for post-payment audit</p>
Required security updates and deficiencies have been addressed	<ul style="list-style-type: none"> Corrective action plan 	<p>Inquire and obtain the remediation plan based on the risks identified by the assessment. Ensure plan includes responsible parties and time frames.</p> <p>Determine what components of the Corrective Action Plan (CAP) have been implemented and the planned implementation of the remaining CAP. It is not necessary that all deficiencies</p>		<p>Pre-screening and applications selected for post-payment audit</p>

		be mitigated at the time of attestation, but there should be a plan in place.		
Track #2	Milestone #5	Attestation Requirement		
No EHR to Non-CEHRT Electronic Program-Eligible System	Provider has completed VITL Access credentialing, training, and usage for at least one client, on or after October 1, 2022.	<p style="text-align: center;"><u>YES / NO</u></p> <p>VITL Access is a secure internet portal which provides authorized users, with proper patient consent, a patient-centered view of the personal health information available through the Vermont Health Information Exchange (VHIE). Providers must attest YES to VITL Access credentialing, training, and usage for at least one client, on or after October 1, 2022.</p> <p style="text-align: center;">One New VITL Access User / Two to Nine New VITL Access Users / Ten Plus New VITL Access Users</p> <p>Providers must attest to the number/range of new, credentialed, and trained users for VITL Access. Incentive payment amounts for this milestone will be adjusted based on the number of new VITL Access users.</p>		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
For providers attesting as group practice/facility, evidence VITL Access has been used by at least one authorized person at the practice on or after October 1, 2022, and for individual providers attesting as a solo provider, evidence VITL Access has been used by the attesting provider on or after October 1, 2022.	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming VITL Access usage on or after October 1, 2022 	Obtain evidence showing the provider has used VITL Access for at least one client, on or after October 1, 2022, such as an email, letter, or other communication from VITL confirming VITL Access users for the organization.		Pre-screening and applications selected for post-payment audit
Evidence of the number of new VITL Access users at the	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming VITL Access usage 	Obtain and review documentation that shows the number of new VITL Access users at the organization, such as an email, letter, or other communication from VITL confirming VITL		Pre-screening and applications selected for post-payment audit

practice/organization.	on or after October 1, 2022	Access users for the organization. Compare the number of VITL Access users listed on the VITL documentation to the attested number of new VITL Access users.		
Track #3	Milestone #1a	Attestation Requirement		
VHIE Connection with a CEHRT System	Signed Participation Agreement for VHIE Connection with certified EHR technology (CEHRT)	<p style="text-align: center;"><u>YES / NO</u></p> Providers must attest YES to signing a participation agreement to receive technical assistance and program support to connect to the Vermont Health Information Exchange (VHIE) with certified electronic health record technology (CEHRT), and begin engagement with the MDAAP technical assistance/program support team within 30 days of the participation agreement being signed by all parties.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of signed participation agreement	<ul style="list-style-type: none"> Copy of signed participation agreement to connect CEHRT to VHIE 	<p>Obtain and review a copy of the signed participation agreement to connect to the VHIE with CEHRT.</p> <p>Look for correct practice name, address, signatures, and date.</p>		Pre-screening and repeated as part of audit screening
Track #3	Milestone #1b	Attestation Requirement		
VHIE Connection with a CEHRT System	Signed VHIE Service Agreement Amendment for 42 CFR Part 2 Data (Connectivity Plan Proposal required track only)	<p style="text-align: center;"><u>YES / NO</u></p> Providers must attest YES to signing a Vermont Health Information Exchange (VHIE) Service Agreement Amendment for 42 CFR Part 2 Data (Connectivity Plan Proposal [CPP] required track only) on or after October 1, 2022.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of signed service agreement amendment for 42 CFR Part 2 Data	<ul style="list-style-type: none"> Copy of signed VHIE Service Agreement Amendment for 42 CFR Part II Data 	Obtain and review a copy of the signed VHIE Service Agreement Amendment for 42 CFR Part II Data (CPP required track only).		Pre-screening and applications selected for post-payment audit

		Look for correct practice name, address, signature, and date.		
Track #3	Milestone #2a	Attestation Requirement		
VHIE Connection with a CEHRT System	Signed Scope of Services Agreement to connect to the VHIE	<u>YES / NO</u> Providers must attest YES to signing a scope of services agreement to define the suite of technical assistance/program support services that will be provided to the practice to successfully achieve the objectives of the MDAAP to connect to the Vermont Health Information Exchange (VHIE) with certified electronic health record technology (CEHRT).		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of signed copy of services agreement	<ul style="list-style-type: none"> Copy of signed scope of services agreement for the VHIE Connection with a CEHRT system track 	<p>Obtain and review a copy of the signed scope of services agreement for VHIE connection with CEHRT.</p> <p>Look for the correct practice name, address, signature, and date.</p>		Pre-screening and applications selected for post-payment audit
Track #3	Milestone #2b	Attestation Requirement		
VHIE Connection with a CEHRT System	Approved Connectivity Plan Proposal as required by an existing Designated Agency or Specialized Service Agency Provider Agreement	<u>YES / NO</u> Providers must attest YES to having a State of Vermont approved Connectivity Plan Proposal as required by an existing Designated Agency or Specialized Service Agency Provider Agreement, to connect to the Vermont Health Information Exchange (VHIE). The Connectivity Plan Proposal must be approved by the State of Vermont on or after October 1, 2022.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of an approved Connectivity Plan Proposal	<ul style="list-style-type: none"> Copy of approved and signed connectivity plan proposal Copy of email of letter from the State of Vermont approving 	<p>Obtain and review the Designated or Specialized Service Agency's connectivity plan proposal. Look for the correct practice name, address, date, and signature by the Designated or Specialized Service Agency.</p> <p>Review and confirm there is a State of Vermont approval letter/email of Connectivity Plan</p>		Pre-screening and applications selected for post-payment audit

	connectivity plan proposal	Proposal from State of Vermont Agency of Human Services.		
Track #3	Milestone #3	Attestation Requirement		
VHIE Connection with a CEHRT System	Use the VITL SRA documentation template and conduct or review a security risk analysis in accordance with the requirements under 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI data created or maintained by certified electronic health record technology (CEHRT) or other eligible program-defined technology, in accordance with requirements in 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), implement security updates as necessary and correct identified security deficiencies as part of the MDAAP eligible provider's risk management process.	<p style="text-align: center;"><u>YES / NO</u></p> Providers must attest YES to using the VITL security risk assessment (SRA) documentation template and conducting or reviewing a security risk analysis and implementing security updates as needed and correcting identified security deficiencies to meet this measure within 12 months prior to the date of attestation for this milestone.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
A security risk analysis (SRA) was reviewed or completed in accordance with the requirements within 12 months prior to the date of	<ul style="list-style-type: none"> Completed VITL SRA template Review of documentation – a copy of the security analysis conducted (including findings) 	Inquire and obtain evidence of the criteria used for the security risk assessment (SRA) by obtaining documentation of procedures and steps performed during the analysis. Providers are required to complete the VITL SRA template. The two chief elements that should be reviewed are the asset inventory and a final report. The asset inventory will demonstrate that the practice identified the type, location,	Date of attestation for SRA milestone: Date SRA/review:	Pre-screening and applications selected for post-payment audit

attestation for this milestone, using the VITL SRA template.	and recommendations)	<p>the responsible person, and whether or not the asset contained PHI. The asset inventory is a critical step as it defines the scope of the SRA. The final report identifies the risks; it should be dated and identify the organization/practice for which the SRA was done. A letter from a vendor stating the assessment was done is not sufficient. A redacted assessment is not acceptable.</p> <p>The security risk analysis must be conducted within 12 months prior to the date of attestation for the MDAAP SRA milestone.</p> <p>Obtain evidence the security risk analysis addressing encryption/security of data was performed at least once.</p> <p>Obtain evidence that the deficiencies noted during the assessment have been documented.</p>		
Required security updates and deficiencies have been addressed	<ul style="list-style-type: none"> Corrective action plan 	<p>Inquire and obtain the remediation plan based on the risks identified by the assessment. Ensure plan includes responsible parties and time frames.</p> <p>Determine what components of the Corrective Action Plan (CAP) have been implemented and the planned implementation of the remaining CAP. It is not necessary that all deficiencies be mitigated at the time of attestation, but there should be a plan in place.</p>		Pre-screening and applications selected for post-payment audit
Track #3	Milestone #4	Attestation Requirement		
VHIE Connection with a CEHRT System	The provider has a vendor contract for an Admit, Discharge, Transfer (ADT) interface for their CEHRT.	<u>YES / NO</u> Providers must attest YES to having a vendor contract for an Admit, Discharge, Transfer (ADT) interface for their CEHRT on or after October 1, 2022		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference

Evidence of vendor contract for CEHRT ADT interface	<ul style="list-style-type: none"> Executed EHR SOW Executed Vermont Health Information Exchange (VHIE) Services Agreement with VITL 	<p>Obtain and review documentation that shows the provider/practice has a vendor contract for an ADT interface for their CEHRT on or after October 1, 2022, such as a copy of the executed EHR vendor statement of work (SOW) spelling out the specific interfaces in scope, and a copy of the executed VHIE services agreement with VITL.</p> <p>Look for correct practice name, signatures, and date.</p>		Pre-screening and applications selected for post-payment audit
Track #3	Milestone #5	Attestation Requirement		
VHIE Connection with a CEHRT System	The provider has a vendor contract for a Continuity of Care Document (CCD) interface for their CEHRT.	<p style="text-align: center;"><u>YES / NO</u></p> <p>Providers must attest YES to having a vendor contract for a Continuity of Care Document (CCD) interface for their CEHRT on or after October 1, 2022</p>		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of vendor contract for CEHRT CCD interface	<ul style="list-style-type: none"> Executed EHR SOW Executed Vermont Health Information Exchange (VHIE) Services Agreement with VITL 	<p>Obtain and review documentation that shows the provider/practice has a vendor contract for a CCD interface for their CEHRT on or after October 1, 2022, such as a copy of the executed EHR vendor statement of work (SOW) spelling out the specific interfaces in scope, and a copy of the executed VHIE services agreement with VITL.</p> <p>Look for correct practice name, signatures, and date.</p>		Pre-screening and applications selected for post-payment audit
Track #3	Milestone #6	Attestation Requirement		
VHIE Connection with a CEHRT System	The provider has achieved Go-Live on or after October 1, 2022, and is sending production encounter	<p style="text-align: center;"><u>YES / NO</u></p> <p>Providers must attest YES to Go-live and electronically submitting production encounter data (Admit, Transfer, Discharge (ADT)) to the Vermont Health Information Exchange (VHIE) on or after October 1, 2022, using CEHRT.</p>		

	data (ADT) to VITL, the operator of Vermont's Health Information Exchange (VHIE), using CEHRT, except where prohibited and in accordance with applicable law and practice			
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Proof of provider Go-live and sending electronic production level encounter data (ADT) to VITL on or after October 1, 2022.	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming Go-Live and production data being sent VITL connectivity dashboard report provided to the state as deliverable VITL attestation of provider/practice Go-Live/production data being sent to the VHIE 	Obtain evidence showing Go-Live and ongoing submission of clinical data (CCD) from the Provider's practice to the VHIE, on or after October 1, 2022, such as email from VITL containing Go-Live date or stating production data is being sent, VITL attestation, VITL connectivity dashboard, or written verification by VITL project lead that ADT interface has been successfully moved from the Test Environment to the Production Environment and are sending production messages. .		Pre-screening and applications selected for post-payment audit
Track #3	Milestone #7	Attestation Requirement		
VHIE Connection with a CEHRT System	The provider has achieved Go-Live on or after October 1, 2022 and is sending production clinical data (CCD) to VITL, the operator of Vermont's Health Information Exchange (VHIE), using CEHRT, except where prohibited and in accordance with applicable law and practice.	<p style="text-align: center;"><u>YES / NO</u></p> Providers must attest YES to Go-live and electronically submitting production clinical data (Continuity of Care Document (CCD)) to Vermont Health Information Exchange (VHIE) on or after October 1, 2022, using CEHRT.		

Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Proof of provider Go-live and sending electronic production level encounter data (ADT) to VITL on or after October 1, 2022.	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming Go-Live and production data being sent VITL connectivity dashboard report provided to the state as deliverable VITL attestation of provider/practice Go-Live/production data being sent to the VHIE 	Obtain evidence showing Go-Live and ongoing submission of clinical data (CCD) from the Provider's practice to the VHIE, on or after October 1, 2022, such as email from VITL containing Go-Live date or stating production data is being sent, VITL attestation, VITL connectivity dashboard, or written verification by VITL project lead that ADT interface has been successfully moved from the Test Environment to the Production Environment and are sending production messages.		Pre-screening and applications selected for post-payment audit
Track #4	Milestone #1	Attestation Requirement		
VHIE Connection with a non-CEHRT Electronic Program-Eligible System	Signed Participation Agreement to Explore VHIE Connection with Program-Eligible, Non-CEHRT	<u>YES / NO</u> Providers must attest YES to signing a participation agreement to receive technical assistance and program support to explore connection to the Vermont Health Information Exchange (VHIE) with active HITRUST Common Security Framework-certified technology (not ONC certified electronic health record technology), and begin engagement with the MDAAP technical assistance/program support team within 30 days of the participation agreement being signed by all parties.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of signed participation agreement	<ul style="list-style-type: none"> Copy of signed participation agreement to explore connection to the VHIE with non-CEHRT, that is HITRUST certified 	<p>Obtain and review a copy of the signed participation agreement to explore connection to the VHIE with non-CEHRT that is HITRUST certified.</p> <p>Look for correct practice name, address, signatures, and date.</p>		Pre-screening and applications selected for post-payment audit
Track #4	Milestone #2	Attestation Requirement		

VHIE Connection with a non-CEHRT Electronic Program-Eligible System	Signed Scope of Services Agreement to Explore VHIE Connection with Program-eligible, Non-CEHRT	<u>YES / NO</u> Providers must attest YES to signing a scope of services agreement to define the suite of technical assistance/program support services that will be provided to the practice to successfully achieve the objectives of the MDAAP to explore connection to the Vermont Health Information Exchange (VHIE) with active HITRUST Common Security Framework-certified technology (not ONC certified electronic health record technology).		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of signed copy of services agreement	<ul style="list-style-type: none"> Copy of signed scope of services agreement for the explore VHIE Connection with HITRUST-certified technology, non-CEHRT track 	<p>Obtain and review a copy of the signed scope of services agreement to explore VHIE connection to the VHIE with non-CEHRT that is HITRUST certified.</p> <p>Look for the correct practice name, address, signature, and date.</p>		Pre-screening and applications selected for post-payment audit
Track #4	Milestone #3	Attestation Requirement		
VHIE Connection with a non-CEHRT Electronic Program-Eligible System	Use the VITL SRA documentation template and conduct or review a security risk analysis in accordance with the requirements under 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI data created or maintained by certified electronic health record technology (CEHRT) or other eligible program-defined technology, in accordance with requirements in 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), implement security updates as necessary and correct identified security deficiencies as	<u>YES / NO</u> Providers must attest YES to using the VITL security risk assessment (SRA) documentation template and conducting or reviewing a security risk analysis and implementing security updates as needed and correcting identified security deficiencies to meet this measure within 12 months prior to the date of attestation for this milestone.		

	part of the MDAAP eligible provider's risk management process.			
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
A security risk analysis (SRA) was reviewed or completed in accordance with the requirements within 12 months prior to the date of attestation for this milestone, using the VITL SRA template.	<ul style="list-style-type: none"> Completed VITL SRA template Review of documentation – a copy of the security analysis conducted (including findings and recommendations) 	<p>Inquire and obtain evidence of the criteria used for the security risk assessment (SRA) by obtaining documentation of procedures and steps performed during the analysis. Providers are required to complete the VITL SRA template. The two chief elements that should be reviewed are the asset inventory and a final report. The asset inventory will demonstrate that the practice identified the type, location, the responsible person, and whether or not the asset contained PHI. The asset inventory is a critical step as it defines the scope of the SRA. The final report identifies the risks; it should be dated and identify the organization/practice for which the SRA was done. A letter from a vendor stating the assessment was done is not sufficient. A redacted assessment is not acceptable.</p> <p>The security risk analysis must be conducted within 12 months prior to the date of attestation for the MDAAP SRA milestone.</p> <p>Obtain evidence the security risk analysis addressing encryption/security of data was performed at least once.</p> <p>Obtain evidence that the deficiencies noted during the assessment have been documented.</p>	<p>Date of attestation for SRA milestone:</p> <p>Date SRA/review:</p>	Pre-screening and applications selected for post-payment audit
Required security updates and deficiencies have been addressed	<ul style="list-style-type: none"> Corrective action plan 	<p>Inquire and obtain the remediation plan based on the risks identified by the assessment. Ensure plan includes responsible parties and time frames.</p> <p>Determine what components of the Corrective Action Plan (CAP) have been implemented and the planned implementation of the remaining CAP. It is not necessary that all deficiencies</p>		Pre-screening and applications selected for post-payment audit

		be mitigated at the time of attestation, but there should be a plan in place.		
Track #4	Milestone #4	Attestation Requirement		
VHIE Connection with a non-CEHRT Electronic Program-Eligible System	Provider has completed VITL Access credentialing, training, and usage for at least one client, on or after October 1, 2022.	<p style="text-align: center;"><u>YES / NO</u></p> <p>VITL Access is a secure internet portal which provides authorized users, with proper patient consent, a patient-centered view of the personal health information available through the Vermont Health Information Exchange (VHIE). Providers must attest YES to VITL Access credentialing, training, and usage for at least one client, on or after October 1, 2022.</p> <p style="text-align: center;">One New VITL Access User / Two to Nine New VITL Access Users / Ten Plus New VITL Access Users</p> <p>Providers must attest to the number/range of new, credentialed, and trained users for VITL Access. Incentive payment amounts for this milestone will be adjusted based on the number of new VITL Access users.</p>		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
For providers attesting as group practice/facility, evidence VITL Access has been used by at least one authorized person at the practice on or after October 1, 2022, and for individual providers attesting as a solo provider, evidence VITL Access has been used by the attesting provider on or after October 1, 2022.	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming VITL Access usage on or after October 1, 2022 	Obtain evidence showing the provider has used VITL Access for at least one client, on or after October 1, 2022, such as an email, letter, or other communication from VITL confirming VITL Access users for the organization.		Pre-screening and applications selected for post-payment audit
Evidence of the number of new VITL Access users at the	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming VITL Access usage 	Obtain and review documentation that shows the number of new VITL Access users at the organization, such as an email, letter, or other communication from VITL confirming VITL Access users for the organization. Compare the number of VITL Access users listed on the		Pre-screening and applications selected for post-payment audit

practice/organization.	on or after October 1, 2022	VITL documentation to the attested number of new VITL Access users.		
Track #4	Milestone #5	Attestation Requirement		
VHIE Connection with a non-CEHRT Electronic Program-Eligible System	The provider has a vendor contract to connect their non-CEHRT system to the VHIE	<p style="text-align: center;"><u>YES / NO</u></p> <p style="text-align: center;">Providers must attest YES to having a vendor contract for connecting their non-CEHRT system to the Vermont Health Information Exchange (VHIE) on or after October 1, 2022</p>		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of vendor contract for connecting non-CEHRT to the VHIE	<ul style="list-style-type: none"> Executed EHR SOW Executed Vermont Health Information Exchange (VHIE) Services Agreement with VITL 	<p>Obtain and review documentation that shows the provider/practice has a vendor contract for connecting their non-CEHRT to the VHIE on or after October 1, 2022, such as a copy of the executed EHR vendor statement of work (SOW) spelling out the specific interfaces in scope, and a copy of the executed VHIE services agreement with VITL.</p> <p>Look for correct practice name, signatures, and date.</p>		Pre-screening and applications selected for post-payment audit
Track #4	Milestone #6	Attestation Requirement		
VHIE Connection with a non-CEHRT Electronic Program-Eligible System	The provider has achieved Go-Live on or after October 1, 2022, and is sending production data to VITL, the operator of Vermont's Health Information Exchange (VHIE), using non-CEHRT, except where prohibited and in accordance with applicable law and practice.	<p style="text-align: center;"><u>YES / NO</u></p> <p style="text-align: center;">Providers must attest YES to Go-live and electronically submitting production data to Vermont Health Information Exchange (VHIE) on or after October 1, 2022, using non-Certified Electronic Health Record Technology (non-CEHRT).</p>		

Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Proof of provider Go-live and sending electronic production level data to VITL on or after October 1, 2022.	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming Go-Live and production data being sent VITL connectivity dashboard report provided to the state as deliverable VITL attestation of provider/practice Go-Live/production data being sent to the VHIE 	Obtain evidence showing Go-Live and ongoing submission of data from the Provider's practice to the VHIE, on or after October 1, 2022, such as email from VITL containing Go-Live date or stating production data is being sent, VITL attestation, VITL connectivity dashboard, or written verification by VITL project lead that interface has been successfully moved from the Test Environment to the Production Environment and are sending production messages.		Pre-screening and applications selected for post-payment audit
Track #5	Milestone #1	Attestation Requirement		
VITL Access Only	Signed Participation Agreement to receive training and connect to VITL Access	<u>YES / NO</u> Providers must attest YES to signing a participation agreement to receive technical assistance and program support to receive training and connect to VITL Access, and begin engagement with the MDAAP technical assistance/program support team within 30 days of the participation agreement being signed by all parties.		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
Evidence of signed participation agreement	<ul style="list-style-type: none"> Copy of signed participation agreement to receive training and connect to VITL Access 	Obtain and review a copy of the signed participation agreement to implement CEHRT. Look for correct practice name, address, signatures, and date.		Pre-screening and applications selected for post-payment audit
Track #5	Milestone #2	Attestation Requirement		
VITL Access Only	Provider has completed VITL Access credentialing, training, and usage for at least	<u>YES / NO</u>		

	one client, on or after October 1, 2022.	<p>VITL Access is a secure internet portal which provides authorized users, with proper patient consent, a patient-centered view of the personal health information available through the Vermont Health Information Exchange (VHIE). Providers must attest YES to VITL Access credentialing, training, and usage for at least one client, on or after October 1, 2022.</p> <p style="text-align: center;">One New VITL Access User / Two to Nine New VITL Access Users / Ten Plus New VITL Access Users</p> <p style="text-align: center;">Providers must attest to the number/range of new, credentialed, and trained users for VITL Access. Incentive payment amounts for this milestone will be adjusted based on the number of new VITL Access users.</p>		
Milestone Documentation Requirement	Possible Data Sources	Procedures	Result/Calculations	W/P Reference
For providers attesting as group practice/facility, evidence VITL Access has been used by at least one authorized person at the practice on or after October 1, 2022, and for individual providers attesting as a solo provider, evidence VITL Access has been used by the attesting provider on or after October 1, 2022	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming VITL Access usage on or after October 1, 2022 	Obtain evidence showing the provider has used VITL Access for at least one client, on or after October 1, 2022, such as an email, letter, or other communication from VITL confirming VITL Access users for the organization.		Pre-screening and applications selected for post-payment audit
Evidence of the number of new VITL Access users at the practice/organization.	<ul style="list-style-type: none"> Email, letter or other communication from VITL confirming VITL Access usage on or after October 1, 2022 	Obtain and review documentation that shows the number of new VITL Access users at the organization, such as an email, letter, or other communication from VITL confirming VITL Access users for the organization. Compare the number of VITL Access users listed on the VITL documentation to the attested number of new VITL Access users.		Pre-screening and applications selected for post-payment audit