

The American Re-Investment and Recovery Act (ARRA) of 2009 provided as much as 27 billion dollars to be distributed over 10 years to support the adoption of Electronic Health Records (EHR). Enacted as part of the ARRA, the Health Information Technology for Economic and Clinical Health Act (HITECH Act) created programs under the Centers for Medicare and Medicaid Services (CMS) to provide incentive payments for 'meaningful use' of certified EHR technology. The Commonwealth of Massachusetts Medicaid EHR Incentive Program is a multi-year, multi-stage program administered by the Executive Office of Health and Human Services (EOHHS).

When does the Commonwealth's Medicaid EHR Incentive Program begin?

The Commonwealth's Medicaid EHR Incentive Program is set to launch on October 3, 2011. For more information regarding this, please contact the MeHI, the Massachusetts eHealth Institute, at 1-855-MassEHR or visit our website at mehi.masstech.org.

What are the goals of the Medicaid EHR Incentive Program?

The goals of the EHR Incentive Program are to promote the adoption of certified electronic health records across the Commonwealth of Massachusetts in order to improve the quality, safety and efficiency of patient care.

Which Eligible Professionals (EPs) qualify to receive the incentive payment?

The following are considered Medicaid EPs:

- Non- Hospital Based Physicians *
- Dentists
- Certified Nurse-Midwives
- Nurse Practitioners
- Physician Assistants practicing in a Federally Qualified Health Center (FQHC) or Rural Health Center (RHC), so led by a Physician Assistant

* An EP is considered hospital-based if 90% or more of the EP's services are performed in a hospital inpatient or emergency room setting.

How do I register for the Medicaid EHR Incentive Program?

EPs will be required to register through the Center for Medicare & Medicaid Registration & Attestation System (CMS R & A) to participate in the Medicaid EHR Incentive Program. Once the provider registers with the CMS R & A and selects Medicaid and Massachusetts, the CMS R & A will send the registration information to MeHI, the Massachusetts eHealth Institute, which is working in collaboration with the Executive Office of Health and Human Services and MassHealth to process requests for the Medicaid EHR Incentive Program.

Can EPs allow another person to register or attest for them?

Yes. In 2011, CMS implemented functionality that allows EPs to designate a third party to register and attest on their behalf. To do so, the user working on behalf of the EP must have a CMS Identity and Access Management System (I & A) web user account and be associated with the EP's National Provider Identification (NPI) number.

Can multiple EPs practicing at the same location be registered at one time?

No. The Medicaid EHR Incentive Payment will be distributed per EP, not at the group or clinic level. Therefore, each EP must be registered separately.

Do EPs need to be in the CMS Provider Enrollment, Chain and Ownership System (PECOS) to register for the Medicaid EHR Incentive Program?

Medicaid EPs do not need to be registered in the PECOS system in order to receive incentive payments.

What will EPs be required to do in year one of the program?

In the first year, EPs must have Adopted, Implemented, or Upgraded (A/I/U) to Certified EHR Healthcare Technology in order to receive an incentive payment from the Commonwealth. A/I/U is defined as:

- Acquired, Purchased, or Secured access to certified EHR technology
- Installed or initiated the use of certified EHR technology
- Expanded functionality of certified EHR technology

How do I demonstrate A/I/U?

EPs can demonstrate A/I/U by providing their EHR certification number with either a Proof of Purchase, Data User Form, Vendor Agreement or a letter from their Chief Information Officer (CIO) stating they have a certified EHR system.

Other than demonstrating A/I/U within the first year of the program, are there any other requirements that must be met to receive the Medicaid Incentive Payment?

Yes. EPs must also meet one of the following patient threshold criteria in order to qualify for incentive payments:

- Have a minimum of 30% Medicaid Patient Volume
- Pediatricians must have a minimum of 20% Medicaid Patient Volume



How do I obtain a CMS EHR certification ID for my EHR system?

EHR certification IDs can be found by visiting the Office of the National Coordinator for Health Information Technology (ONC) website. Here, you can search by product name or Certified Health IT Product List (CHPL) number. Once the EHR product list is generated, click on the appropriate system to obtain the EHR certification ID.

How would I go about getting my EHR system certified?

If your system is not certified, it must be tested and certified by an ONC Authorized Testing and Certification Body (ATCB). More information can be found by visiting the ONC website at www.healthit.gov

To reach the patient threshold percentage can I use multiple practice locations?

Yes. If you're an EP, you can use one or more practice locations to calculate patient volume. However, one of the practice locations included in the calculated patient volume must have adopted, implemented, or upgraded their certified EHR system.

What is the definition of an encounter?

For the purpose of the Medicaid EHR Incentive Program, an encounter is defined as one Medicaid service, per day, per Medicaid patient where Medicaid (including 1115 Waiver Population) paid for part or all of the service including an individual's premiums, co-payments and cost-sharing.

* Children's Health Insurance Program (CHIP) patients do not count toward the Medicaid patient volume

Where can the Medicaid/1115 Waiver Population list be found?

For a comprehensive list of the Medicaid/1115 Waiver population, please visit mehi.masstech.org, select the Programs menu, select the Medicaid EHR Incentive Program menu, select Toolkit, and finally click on the link titled Medicaid 1115 Waiver Population Grid.



How is the patient volume calculated?

Patient volume can be calculated using individual, group/clinic or panel data.

Scenario A: Dr. Black has a total of 300 patient encounters within the selected 90 day reporting period (previous calendar year); 100 are Medicaid encounters. In order to calculate the percentage of Medicaid patient volume, Dr. Black divides the total number of his Medicaid patient encounters by the total number of his patient encounters.

Dr. Black's patient volume would be as follows:

$$100/300 = .33 \times 100 = 33\%$$

Dr. Black has met the patient volume threshold and is eligible to participate in the Medicaid EHR Incentive Program.

Scenario B: Dr. Green practices at multiple locations; Central West Medical Center and Central East Medical Center. At Central West, Dr. Green has 95 patient encounters for the 90 day selected reporting period; 35 of the encounters are Medicaid. At Central East, he has 95 patient encounters as well; 30 of the encounters are Medicaid. Dr. Green has chosen to use both practice locations to calculate the total percentage of his Medicaid patient volume.

Dr. Green's patient volume would be as follows:

Total Medicaid encounters: 65
Total patient encounters: 190
 $65/190 = .34 \times 100 = 34\%$

Dr. Green has met the patient volume threshold and is eligible to participate in the Medicaid EHR Incentive Program.

Scenario C: Dr. Red has a total of 100 patient encounters within the selected 90 day reporting period; 18 are Medicaid Encounters. In order to calculate the percentage of Medicaid patient volume, Dr. Red divides the total number of his Medicaid patient encounters by the total number of his patient encounters.

Dr. Red's patient volume would be as follows:

$18/100 = .18 \times 100 = 18\%$

Based upon the scenario, Dr. Red does not meet the patient threshold percentage and is not eligible to participate in the Medicaid EHR Incentive Program.

Scenario D: The following EPs practice at Central South Health Center:

EP 1(Physician): had 40% Medicaid encounters (80/200 encounters)

EP 2(Physician): had 50% Medicaid encounters (50/100 encounters)

EP 3(Nurse Practitioner): had 10% Medicaid encounters (30/300)

EP 4(Dentist): had 5% Medicaid encounters (5/100)

EP 5(Nurse- Midwife): had 10% Medicaid encounters (20/200)

Pharmacist: had 75% Medicaid encounters (150/200)

Dietician: had 80% Medicaid encounters (80/100)

In total, there are 1200 encounters within the 90 day selected reporting period; 415 are Medicaid encounters. Central South Health Center's Medicaid patient volume would be as follows:

$415/1200 = .35 \times 100 = 35\%$

Based upon the scenario, 5 of the 7 EPs would be eligible to participate in the Medicaid EHR Incentive Program. Both the Pharmacist and Dietician are not considered EPs, but their volume must be included.

Am I eligible to receive incentive payments from both Medicare and Medicaid?

EPs can only receive incentive payments from one program. Choosing a program will be up to your discretion. The total Medicaid Incentive Payment is \$63,750 for EPs, while the total Medicare Incentive Payment is \$44,000.

How much will EPs receive in Incentive Payments?

EPs can receive up to \$63,750 over the six years they have chosen to participate in the program. The first year's payment is \$21,250 with payments of \$8,500 over the remaining 5 years.

Year	Medicaid EP's Who demonstrated A/I/U and Meaningful Use in					
	2011	2012	2013	2014	2015	2016
2011	\$ 21,250					
2012	\$ 8,500	\$ 21,250				
2013	\$ 8,500	\$ 8,500	\$ 21,250			
2014	\$ 8,500	\$ 8,500	\$ 8,500	\$ 21,250		
2015	\$ 8,500	\$ 8,500	\$ 8,500	\$ 8,500	\$ 21,250	
2016	\$ 8,500	\$ 8,500	\$ 8,500	\$ 8,500	\$ 8,500	\$ 21,250
2017		\$ 8,500	\$ 8,500	\$ 8,500	\$ 8,500	\$ 8,500
2018			\$ 8,500	\$ 8,500	\$ 8,500	\$ 8,500
2019				\$ 8,500	\$ 8,500	\$ 8,500
2020					\$ 8,500	\$ 8,500
2021						\$ 8,500
Total:	\$ 63,750	\$ 63,750	\$ 63,750	\$ 63,750	\$ 63,750	\$ 63,750

www.cms.gov

Are there different payment amounts for Eligible Pediatricians?

Yes. Pediatricians that reach the 20% patient volume threshold, but fall short of the 30% patient volume requirements will receive \$14,167.00 in the first year and \$5,667 in subsequent years, totaling six years. If a Pediatrician reaches the 30% patient volume threshold, he/she will receive \$21,250.00 in the first year and \$8,500 in subsequent years, totaling six years.

How does the Commonwealth define a Pediatrician for the purpose of the Medicaid EHR Incentive Program?

A Pediatrician is defined as Board Eligible or Board Certified in Pediatric medicine.

How can Nurse Practitioners (NPs) that reach the Medicaid patient threshold, who bill under a provider participate when they are not contracted with Medicaid?

NPs that meet the 30% Medicaid patient threshold in the chosen 90 day reporting period should register with the CMS R&A system. If the NP is not recognized in the Medicaid Management Information System (MMIS), a special enrollment will need to be completed. Please contact one of our Enrollment Analysts with any questions at 1-855-MassEHR.

Is the incentive payment considered taxable income?

Yes, the incentive payment is considered taxable income. A 1099 will be issued to the payee. For example: Dr. Green works for Central West Medical Center, who purchased and installed an EHR system to support his practice. He decides to reassign his payment to Central West Medical Center. Therefore, the medical center will be issued a 1099, not Dr. Green.



If I meet the requirements, what year can I register to participate in the Medicaid EHR Incentive Program?

We recommend all Medicaid EPs register as soon as possible in order to take full advantage of the allowable incentives. The latest you can register is 2016.

How is the Commonwealth defining a payment year?

For the purpose of the Medicaid EHR Incentive Program, a payment year for EPs is any calendar year starting from 2011 to 2021. All EPs must be registered for the program by the end of 2016 to participate.

What if my facility does not have certified Electronic Health Records? Are there any resources available to help decide if a certified EHR would be beneficial for my practice?

The eHealth Services Center at MeHI has many resources available and will work directly with providers and hospitals to effectively implement qualified Electronic Health Records and achieve meaningful use. Please visit the Services Center web pages: <http://mehi.masstech.org/ehealth-services-center>.

When will the state be accepting Attestation for Meaningful Use (MU)?

Meaningful Use Attestation for the Commonwealth will begin in your second year of participation in the program.

Who should I contact if I have a question, need on-site training or if I am experiencing difficulty registering or attesting to participate for the Medicaid EHR Incentive Program?

Please contact the Massachusetts eHealth Institute, Medicaid EHR Incentive Program, a Division of the Massachusetts Technology Collaborative by using one of the following methods:

Inquiry Line: 1-855-Mass-EHR (1855-627-7347)

- Our Customer Service Line will be available to accept calls on October 3, 2011.

Email: massEHR@masstech.org

Fax: TBD

Website: mehi.masstech.org

- Request a training session
- Submit a question

What are some other helpful links to visit?

Useful Information about Health Information Technology and the Medicaid EHR Incentive Program can be found at the following websites:

MeHI, the Massachusetts eHealth Institute: mehi.masstech.org

Executive Office of Health and Human Services: www.mass.gov/eohhs/provider/insurance/masshealth/ehr

Centers for Medicare and Medicaid: www.cms.gov

Office of the National Coordinator for Health Information Technology: www.healthit.gov

Office of Civil Rights (**questions regarding EHR privacy/security**): www.hhs.gov/ocr/office