October 2, 2017: This *Update* has been revised since its original publication. Information under the "Clinical Quality Measure Reporting Period" heading has been revised in response to the CMS Hospital Inpatient Prospective Payment System final rule.



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Affected Programs: BadgerCare Plus, Medicaid

To: Hospital Providers, HMOs and Other Managed Care Programs

Information for Eligible Hospitals Regarding Program Year 2017 of the Wisconsin Medicaid Electronic Health Record Incentive Program

This *ForwardHealth Update* provides information for Eligible Hospitals regarding Program Year 2017 of the Wisconsin Medicaid Electronic Health Record Incentive Program.

Application Submission Date for Program Year 2017

Beginning July 17, 2017, Eligible Hospitals may apply for a Program Year 2017 incentive payment from the Wisconsin Medicaid Electronic Health Record (EHR) Incentive Program.

Per federal regulations, Program Year 2017 of the Wisconsin Medicaid EHR Incentive Program is January 1, 2017, through December 31, 2017; however, the Wisconsin Medicaid EHR Incentive Program allows a grace period at the end of the Program Year for Eligible Hospitals to apply for an incentive payment. The grace period for Eligible Hospitals to apply for a Program Year 2017 incentive payment is January 1, 2018, through March 31, 2018. Applications submitted after March 31, 2018, will not be accepted.

Since Program Year 2016, Eligible Hospitals are required to participate in consecutive years. If an Eligible Hospital does not participate in consecutive years, its incentive payments will be discontinued. Eligible Hospitals that did not receive

an EHR incentive payment in Program Year 2016 are not eligible for a payment in Program Year 2017.

Meaningful Use

EHR Reporting Periods for Meaningful Use

On November 14, 2016, the Centers for Medicare and Medicaid Services (CMS) released the Hospital Outpatient Prospective Payment System (OPPS) final rule, which allows a 90-day EHR reporting period in Program Year 2017 for all Eligible Hospitals, regardless of prior participation.

For Eligible Hospitals that are either attesting to Meaningful Use criteria for the first time or have successfully demonstrated any stage of Meaningful Use in a prior year, the EHR reporting period is any continuous 90-day period between January 1, 2017, and December 31, 2017.

Clinical Quality Measure Reporting Periods

The CQM reporting period for Meaningful Use for Program Year 2017 for all Eligible Hospitals is any continuous 90-day period between January 1, 2017, and December 31, 2017.

Dual Eligible Hospitals

Dual Eligible Hospitals, which are hospitals participating in both the Medicare EHR Incentive Program and the Wisconsin Medicaid EHR Incentive Program, are required to

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report Meaningful Use measures to CMS. When applying for a Wisconsin Medicaid EHR Incentive Program incentive payment, Dual Eligible Hospitals are required to attest to eligibility criteria but are not required to report Meaningful Use measures since they already reported the measures to CMS. CMS will communicate the following to the Wisconsin Medicaid EHR Incentive Program:

- The Meaningful Use measures that the Dual Eligible Hospital reported to CMS.
- Whether or not the Dual Eligible Hospital meets Meaningful Use requirements.

The Wisconsin Medicaid EHR Incentive Program will only approve a Dual Eligible Hospital's application for a Wisconsin Medicaid EHR Incentive Program incentive payment if CMS approves the reported Meaningful Use measures and if the Dual Eligible Hospital meets eligibility requirements.

Medicaid-Only Eligible Hospitals

The Wisconsin Medicaid EHR Incentive Program has determined that all Medicaid-only Eligible Hospitals participating in the Wisconsin Medicaid EHR Incentive Program have received their third and final incentive payment. Per federal regulations, Program Year 2016 was the last time an Eligible Hospital could initiate participation in the Medicaid EHR Incentive Program.

Notifying Eligible Hospitals of Patient Volume and Medicaid Inpatient Bed Day Totals Used for Determining Eligibility for Incentive Payments

The Wisconsin Medicaid EHR Incentive Program will send an email to an Eligible Hospital's contact person detailing information regarding the Eligible Hospital's patient volume and, if applicable, Medicaid Inpatient Bed Day total that will be used in determining eligibility for incentive payments. Eligible Hospitals will not be able to apply for Program Year 2017 until this information is received.

Certified Electronic Health Record Technology

For Program Year 2017, Eligible Hospitals are required to use Certified Electronic Health Record Technology (CEHRT) that meets the criteria for the Office of the National Coordinator for Health Information Technology 2015 Edition, the 2014 Edition, or a combination of the two editions, regardless of their attestation phase (Modified Stage 2 or Stage 3 of Meaningful Use). For further information, Eligible Hospitals should refer to the Certified Electronic Health Record Technology topic (topic #16861) in the An Overview chapter of the EHR Incentive Program section of the Hospital, Inpatient service area of the ForwardHealth Online Handbook at www.forwardhealth.wi.gov/.

Documentation Submission Requirements

CEHRT

In Program Year 2017, Eligible Hospitals are required to submit documentation to support the acquisition of CEHRT. This documentation must be submitted with their Wisconsin Medicaid EHR Incentive Program application, unless otherwise noted. For additional information on CEHRT documentation requirements, Eligible Hospitals may refer to the Certified Electronic Health Record Technology topic (topic # 16861).

Medicare Cost Report Data

In Program Year 2017, Eligible Hospitals are required to submit all relevant Medicare cost report sections with their Wisconsin Medicaid EHR Incentive Program application. These cost report sections will be used to determine the incentive payment amount.

For additional information on Medicare cost report documentation requirements, Eligible Hospitals may refer to the Information Needed to Determine the Incentive Payment Amount topic (topic # 12164) in the Financial Information chapter of the EHR Incentive Program section of the Hospital, Inpatient service area of the Online Handbook.

Audits and Appeals

As a reminder, Eligible Hospitals, including Eligible Hospitals applying for a Medicaid-only EHR incentive payment, may be subject to CMS audits and appeals process for Meaningful Use attestations.

For information on the appeals process, Eligible Hospitals should refer to the Centers for Medicare and Medicaid Services Audits and Appeals Process topic (topic #15237) in the Meaningful Use of Certified EHR Technology chapter of the EHR Incentive Program section of the Hospital, Inpatient service area of the Online Handbook.

The *ForwardHealth Update* is the first source of program policy and billing information for providers.

Wisconsin Medicaid, BadgerCare Plus, SeniorCare, and Wisconsin Chronic Disease Program are administered by the Division of Medicaid Services, the Wisconsin Department of Health Services (DHS). The Wisconsin AIDS Drug Assistance Program and the Wisconsin Well Woman Program are administered by the Division of Public Health, DHS.

For questions, call Provider Services at 800-947-9627 or visit our website at www.forwardhealth.wi.gov/.

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