

ForwardHealth **UPDATE**

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2025 HEALTH INFORMATION EXCHANGE PAY-FOR-PERFORMANCE PROGRAM UPDATE

Providers are encouraged to sign up for the 2024 Health Information Exchange Pay-for-Performance (HIE P4P) program before December 31, 2024, as this is the last year to earn an incentive payment with no withholding before the policy changes for the 2025 HIE P4P program.

Effective for dates of service on and after January 1, 2025, the HIE P4P program will implement a 1.5 percent withhold on all inpatient and outpatient fee-for-service claims for non-psychiatric hospitals. Psychiatric hospitals will be subject to a 1 percent withhold.

ForwardHealth will use this new withhold to fund the HIE P4P program and create additional incentive for hospitals to participate in the program in the long term.

Overview

Since 2021, the HIE P4P program has encouraged health care facilities to participate in patient information data sharing among hospitals. The goal

AFFECTED PROGRAMS

BadgerCare Plus, Medicaid

TO

Hospital Providers

QUICK LINKS

- [Resources for Hospital Providers](#)
- [Wisconsin Medicaid Hospital Pay-for-Performance \(P4P\) Guide Measurement Year 2024 \(PDF\)](#)

The information provided in this ForwardHealth Update is published in accordance with 2019 Wisconsin Act 185.

of this program is to provide better patient care, improve access to patient information, and reduce costs.

New Withhold-Based Program

Starting in 2025, every inpatient and outpatient fee-for-service claim will have a 1.5 percent withhold for non-psychiatric hospitals and a 1 percent withhold for psychiatric hospitals.

Health Information Exchange Pay-for-Performance Program Requirements

Hospital performance in the HIE P4P program is based on a hospital's participation in the Wisconsin Statewide Health Information Network (WISHIN).

There are three WISHIN interface categories used to assess hospital performance:

- Admission, Discharge, and Transfer
- Consolidated Clinical Document Architecture
- Lab, Pathology, and Radiology (not required for psychiatric hospitals)

Non-psychiatric hospitals must be live in all three interface categories to earn an incentive payment under the 2025 HIE P4P program.

Earning 2024 Incentive Payment

2024 is the last year for hospitals to sign up with WISHIN and earn an incentive payment with no withholding.

To qualify for the 2024 HIE P4P incentive payment, hospitals must have a “live” status within the three WISHIN interface categories used to assess hospital performance by December 31, 2024.

2025 Program Timeline

The HIE P4P withhold will apply beginning on January 1, 2025. Hospitals will have the opportunity to have their withheld funds returned if they obtain and maintain a “live” status between January 1, 2025, and December 31, 2025.

Hew hospitals are encouraged to contact WISHIN by July 1, 2025, in order to meet the new HIE P4P program requirements by December 31, 2025.

Hospitals that meet all requirements and align with WISHIN regulations will receive their withheld funds, plus an incentive payment in March 2026.



2024 is the last year for hospitals to sign up with WISHIN and earn an incentive payment with no withholding.

RESOURCES

- [WISHIN Services Information](#)
- wishin@wishin.org

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Earning Back Withhold Funds and Incentive Pool

Any hospital that obtains and maintains a “live” status in any interface category by the end of December 31, 2025 will earn back their withheld funds.

- Non-psychiatric hospitals will earn back one-third of withheld funds per each eligible interface.
- Psychiatric hospitals will earn back one-half of withheld funds per each eligible interface.

An incentive pool will be divided among all hospitals that earn a “live” status in all interface categories, in addition to earning back all of their withheld funds. The incentive pool will be portioned out by share of Medicaid inpatient and outpatient hospital claims payments in each respective measurement year.

All hospitals that have not obtained and maintained a “live” status in a particular interface category for the year will have that portion of withheld funds submitted into the incentive pool.

Documentation Retention

Providers are reminded that they must follow the documentation retention requirements per Wis. Admin. Code § [DHS 106.02\(9\)](#). Providers are required to produce or submit documentation, or both, to the Wisconsin Department of Health Services (DHS) upon request. Per Wis. Stat. § [49.45\(3\)\(f\)](#), providers of services shall maintain records as required by DHS for verification of provider claims for reimbursement. DHS may audit such records to verify the actual provision of services and the appropriateness and accuracy of claims. DHS may deny or recoup payment for services that fail to meet these requirements. Refusal to produce documentation may result in denial of submitted claims, recoupment of paid claims, application of intermediate sanctions, or termination from the Medicaid program.

REMINDER

Hospitals are encouraged to contact WISHIN by July 1, 2025, in order to meet the new HIE P4P program requirements by December 31, 2025.

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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 within 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 within DHS.

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