



**Affected Programs:** BadgerCare Plus, Medicaid

**To:** Advanced Practice Nurse Prescribers with Psychiatric Specialty, Dentists, Federally Qualified Health Centers, Nurse Midwives, Nurse Practitioners, Physician Assistants, Physician Clinics, Physicians, Rural Health Clinics, HMOs and Other Managed Care Programs

## **Information for Eligible Professionals Regarding Program Year 2016 of the Wisconsin Medicaid Electronic Health Record Incentive Program**

This *ForwardHealth Update* provides information for Eligible Professionals regarding Program Year 2016 of the Wisconsin Medicaid Electronic Health Record Incentive Program.

### **Application Submission Dates for Program Year 2016**

Beginning October 10, 2016, Eligible Professionals may apply for a Program Year 2016 incentive payment from the Wisconsin Medicaid Electronic Health Record (EHR) Incentive Program.

Per federal regulations, Program Year 2016 of the Wisconsin Medicaid EHR Incentive Program is January 1, 2016, through December 31, 2016; however, the Wisconsin Medicaid EHR Incentive Program allows a grace period at the end of the Program Year for Eligible Professionals to apply for an incentive payment. The grace period for Eligible Professionals to apply for a Program Year 2016 incentive payment is January 1, 2017, through March 31, 2017. Applications submitted after March 31, 2017, will not be accepted.

*Note:* Per federal regulations, Eligible Professionals who wish to participate in the Wisconsin Medicaid EHR Incentive

Program must submit their first application by March 31, 2017.

### **Attestation Phases**

Eligible Professionals are not required to attest in consecutive years. For example, an Eligible Professional may register and complete all requirements for the first year in 2015 and receive a payment but then wait until 2017 to demonstrate Meaningful Use during a 90-day, continuous period for the second payment year.

### ***Adopt, Implement, and Upgrade***

Eligible Professionals may only attest to the Adopt, Implement, Upgrade phase in their first year of participation in the Wisconsin Medicaid EHR Incentive Program. Eligible Professionals attesting that they have adopted, implemented, or upgraded to certified EHR technology (CEHRT) during calendar year 2016 do not also have to attest to Meaningful Use.

### ***Meaningful Use***

#### *Electronic Health Record Reporting Periods*

For all Eligible Professionals, the EHR reporting period for Meaningful Use for Program Year 2016 is any continuous 90-day period between January 1, 2016, and December 31, 2016.

## *Meaningful Use Requirements and Alternate Exclusions*

For Program Year 2016, Eligible Professionals are required to attest to a single set of objectives and measures: Modified Stage 2 of Meaningful Use. The requirements for Modified Stage 2 contain 10 objectives with one or more measures to which Eligible Professionals are required to attest. Some of these objectives include exclusions that allow Eligible Professionals to report that specific Meaningful Use measures are not applicable to them.

In addition to these exclusions, some objectives include alternate exclusions, which are intended to help Eligible Professionals who were scheduled to participate in Stages 1 or 2 of Meaningful Use but are not able to meet the criteria in Program Year 2016 because one of the following is true:

- The Modified Stage 2 criteria require the implementation of CEHRT beyond the functions that were previously required for Stage 1.
- The Eligible Professional did not intend to attest to a particular menu set measure for Stages 1 or 2 of Meaningful Use, however, the measure is required for Modified Stage 2.

Two of the Meaningful Use objectives have alternate exclusions available for Program Year 2016. The alternate exclusions for Program Year 2016 are based on the stage of Meaningful Use that an Eligible Professional is scheduled to be in:

- Eligible Professionals scheduled to be in Stage 1 of Meaningful Use in Program Year 2016 may claim an exclusion for the Computerized Provider Order Entry (CPOE) objective measures 2 (laboratory orders) and 3 (radiology orders).
- Eligible Professionals scheduled to be in any stage of Meaningful Use in Program Year 2016 may claim an exclusion to the public health reporting objective measures 2 (syndromic surveillance reporting) and 3 (specialized registry reporting).

Eligible Professionals who meet the criteria for alternate exclusions can attest to the exclusions for each applicable measure within their application. The alternate exclusions

will only be displayed if the Eligible Professional is qualified based on the stage of Meaningful Use to which the Eligible Professional was previously scheduled to attest.

For additional details, Eligible Professionals should refer to the Modified Stage 2 Meaningful Use Specification Sheets at [www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/2016ProgramRequirements.html](http://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/2016ProgramRequirements.html) prior to completing a Wisconsin Medicaid EHR Incentive Program application.

## **Public Health Reporting Objective**

The public health reporting objective requires Eligible Professionals to demonstrate active engagement with a public health agency to submit electronic public health data from CEHRT. The public health reporting objective contains three measure options. In Program Year 2016, all Eligible Professionals must do one of the following:

- Meet two of three measures
- Meet less than two measures and satisfy the exclusion or alternate exclusion criteria for all other measures
- Satisfy the exclusion or alternate exclusion criteria for all three measures

*Note:* Alternate exclusions are available for measures 2 and 3 only. If an Eligible Professional is in active engagement with two specialized registries, he or she may count the specialized registry reporting measure twice to meet the required number of measures for the public health reporting objective.

## **Certified Electronic Health Record Technology**

For Program Year 2016, Eligible Professionals are able to use CEHRT that meets the criteria outlined in the Office of the National Coordinator for Health Information Technology 2015 Edition. Eligible Professionals are required to use CEHRT that meets the criteria for the 2015 Edition, the 2014 Edition, or a combination of the two editions, regardless of their attestation phase (adopt, implement, upgrade, or Modified Stage 2 of Meaningful Use). For further information, Eligible Professionals should refer to the Certified Electronic Health Record Technology topic

(topic #16897) in the An Overview chapter of the EHR Incentive Program section of the ForwardHealth Online Handbook at [www.forwardhealth.wi.gov/](http://www.forwardhealth.wi.gov/).

## **Documentation Submission Requirements**

In Program Year 2016, Eligible Professionals are required to submit documentation to support patient volume and the acquisition of 2014 Edition 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 Professionals may refer to the Certified Electronic Health Record Technology topic (topic #16897). For additional information on patient volume documentation requirements, Eligible Professionals may refer to the Calculating Eligible Member Patient Volume topic (topic #12098) in the Patient Volume chapter of the EHR Incentive Program section of the Online Handbook.

## **Certified Electronic Health Record Technology-Generated Meaningful Use Reports**

Although Eligible Professionals are not required to upload CEHRT-generated Meaningful Use reports to support attestation in Program Year 2016, they are highly encouraged to do so in order to expedite the processing of applications. Documentation examples include:

- Report(s) generated by CEHRT supporting all Meaningful Use measure numerators and denominators
- Security Risk Analysis Report
- Additional documentation supporting attestations and claimed exclusions

## **Upcoming Program Year 2017 Requirements**

Beginning in Program Year 2017, all Eligible Professionals will be required to submit CEHRT-generated Meaningful Use reports to support attestations. A future *ForwardHealth Update* will contain additional information about the documentation requirements.

## **Audits and Appeals**

As a reminder, Eligible Professionals who receive incentive payments from the Wisconsin Medicaid EHR Incentive Program may be subject to an audit at any time. Eligible Professionals are required to retain all relevant supporting documentation used when completing a Wisconsin Medicaid EHR Incentive Program application for six years post-attestation and submit it to ForwardHealth upon request. The Meaningful Use of Certified EHR Technology chapter of the EHR Incentive Program section of the Online Handbook contains examples of relevant supporting documentation an Eligible Professional may retain for audit purposes.

For information on the appeals process, Eligible Professionals should refer to the Appeals Process topic (topic #12137) in the Appeals chapter of the EHR Incentive Program section 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 Health Care Access and Accountability, 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, Wisconsin DHS.

For questions, call Provider Services at 800-947-9627 or visit our website at [www.forwardhealth.wi.gov/](http://www.forwardhealth.wi.gov/).

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