January 4, 2017: This Update has been revised since its original publication. Information under the "Electronic Health Record Reporting Periods for Meaningful Use" heading has been revised in response to the CMS Hospital Outpatient Prospective Payment System final rule.



Update October 2016

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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 2016 of the Wisconsin Medicaid Electronic Health Record Incentive Program

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

Application Submission Date for Program Year 2016

Beginning October 10, 2016, Eligible Hospitals may apply for a Program Year 2016 incentive payment from the Wisconsin Medicaid EHR Incentive Program.

Per federal regulations, Program Year 2016 of the Wisconsin Medicaid Electronic Health Record (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 Hospitals to apply for an incentive payment. The grace period for Eligible Hospitals 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.

Program Participation

Per federal regulations, all Eligible Hospitals that wish to participate in the Wisconsin Medicaid EHR Incentive Program must submit their first application by March 31, 2017. In addition, beginning with Program Year 2016, Eligible Hospitals must participate in consecutive program years. If an Eligible Hospital does not participate in consecutive program years, its incentive payments will be discontinued.

Medicaid-Only Eligible Hospitals

The Wisconsin Medicaid EHR Incentive Program has determined that all Medicaid-only Eligible Hospitals currently participating in the Wisconsin Medicaid EHR Incentive Program have received their third and final incentive payment. Any Medicaid-only Eligible Hospital that wishes to begin participating in the Wisconsin Medicaid EHR Incentive Program in Program Year 2016 should contact the Wisconsin Medicaid EHR Incentive Program at *DHSEHRIncentiveProgram@dhs.wisconsin.gov* for information about applying.

Meaningful Use

Electronic Health Record Reporting Periods for Meaningful Use

For all Eligible Hospitals, 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.

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 report Meaningful Use measures to the 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. Centers for Medicare and Medicaid Services 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.

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 2016 until they receive this information.

Certified Electronic Health Record Technology

For Program Year 2016, Eligible Hospitals are able to use Certified Electronic Health Record Technology (CEHRT) that meets the criteria outlined in the Office of the National Coordinator for Health Information Technology 2015 Edition. Eligible Hospitals 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 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 ForwardHealth Online Handbook at *mmm.forwardhealth.wi.gov/*.

Documentation Submission Requirements

Certified Electronic Health Record Technology

In Program Year 2016, 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 2016, 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 about CEHRT 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 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 the CMS audits and appeals process for Meaningful Use attestations. For information about 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 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/*. P-1250