ForwardHealth UPDATE
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INFORMATION FOR ELIGIBLE PROFESSIONALS REGARDING PROGRAM YEAR 2021 OF THE WISCONSIN MEDICAID PROMOTING INTEROPERABILITY PROGRAM

Program Year 2021 Reporting and Attestation Timeframe

Program Year 2021 of the Wisconsin Medicaid Promoting Interoperability (PI) Program is the final year for the program. Per federal regulations, all incentive payments for the PI Program must be issued prior to January 1, 2022. After this date, the PI Program will be complete, and no more payments will be issued.

For this reason, the reporting and attestation timeframes for Program Year 2021 will be accelerated. For Program Year 2021, the reporting begins January 1, 2021, and runs through July 31, 2021. Eligible Professionals are required to choose a 90-day electronic health record (EHR) reporting period and Electronic Clinical Quality Measure (eCQM) reporting period from within these dates.

AFFECTED PROGRAMS
BadgerCare Plus, Medicaid

TO
Advanced Practice Nurse Prescribers With Psychiatric Specialty, Community Health Centers, Dentists, Nurse Midwives, Nurse Practitioners, Physician Assistants, Physician Clinics, Physicians, Rural Health Clinics, Tribal Federally Qualified Health Centers

WISCONSIN DEPARTMENT
of **HEALTH SERVICES**

Eligible Professionals may report their EHR information and attest to their eCQMs through the Wisconsin Medicaid PI Program attestation system from April 1, 2021, through August 1, 2021.

Program Year 2021 Standard Deduction for Patient Volume

The standard deduction rate for 2021 has not yet been determined. The rate will be communicated in a future ForwardHealth Update.

Meaningful Use Requirements for Program Year 2021

In 2021, Eligible Professionals must attest to Stage 3 Meaningful Use. To meet Stage 3 Requirements, Eligible Professionals must use technology certified to the 2015 Edition.

Stage 3 Requirements

Stage 3 requirements include eight objectives with one or more measures to which Eligible Professionals are required to attest. Eligible Professionals will attest to all eight objectives by either meeting the measure or satisfying an exclusion, if applicable. Eligible Professionals may choose to satisfy an exclusion, rather than meet the measure, when the measure is not applicable to them and they meet the exclusion criteria.

For additional details about objectives and measures, Eligible Professionals should refer to the Stage 3 Meaningful Use Specification Sheets prior to completing a Wisconsin Medicaid PI Program application.

Stage 3 requirement changes – Objective 1, Protect Electronic Health Information

Previously, the Security Risk Analysis (SRA) must have been completed prior to the date of attestation; in Program Year 2021, Eligible Professionals do not need to complete the SRA prior to the date of attestation, but it must be completed by the end of day on December 31, 2021. Eligible Professionals who do not have the SRA completed by the date of attestation must attest to their intent to complete it by December 31, 2021.

Stage 3 Public Health and Clinical Data Registry Reporting Objective

The public health and clinical data registry reporting objective requires Eligible Professionals to demonstrate active engagement with a public health agency or clinical data registry to submit electronic public health data from certified electronic health record technology (CEHRT). The public health and clinical

data registry reporting objective contains five measure options. In Program Year 2021, all Eligible Professionals must do one of the following:

- Meet two or more of the five measure options
- Meet fewer than two measures and satisfy the exclusion criteria for all other measure options
- Satisfy the exclusion criteria for all measure options

Note: If an Eligible Professional is in active engagement with two public health or clinical data registries, they may choose to report on these measures twice to meet the required number of measures for the public health and clinical data registry reporting objective.

Electronic Clinical Quality Measure Reporting in Program Year 2021

Per CMS, Eligible Professionals must report on a total of six eCQMs. Eligible Professionals must report eCQMs manually through the Wisconsin Medicaid PI Program attestation system. Of the six eCQMs reported, one must be an "outcome" measure. If no outcome measures are relevant to the provider's scope of practice, then the provider must report on one "high-priority" eCQM. If no outcome or high-priority eCQMs are relevant to the Eligible Professional's scope of practice, the Eligible Professional must report on any six eCQMs.

Outcome measures are those that speak to an actual clinical patient outcome rather than measuring whether a process was completed. eCQMs may be designated as high-priority by both CMS and the State. Eligible Professionals should refer to the DHS eHealth Program Quality Series, titled "Wisconsin High-Priority Electronic Clinical Quality Measures," for more information on this requirement and the list of outcome and high-priority eCQMs designated by CMS, Wisconsin, or both.

Documentation Submission Requirements

Eligible Professionals are required to submit the following documentation to support attestation:

- CEHRT documentation
- Meaningful Use report(s) supporting all Meaningful Use percentage-based measures (with numerators and denominators) and/or any other source material used by the Eligible Professional to enter the Meaningful Use measure numerators and denominators
- Patient volume documentation

RESOURCES

- Stage 3 Meaningful Use Specification Sheets
- Wisconsin High-Priority Electronic Clinical Quality Measures
- Eligible Professionals— Required Documentation

- SRA documentation
  - If the SRA has been completed by the date of attestation, the Eligible Professional is required to submit the SRA documentation with the application.
  - If the SRA has not been completed by the date of attestation, the Eligible Professional is required to complete it by the end of day December 31, 2021. Upon completion of the SRA, the Eligible Professional must submit the supporting documentation to DHS via secure email to dhspromotinginteroperabilityprogram@dhs.wisconsin.gov by the end of day, January 31, 2022. The Eligible Professional must identify the organization to which the SRA applies, so it may be properly applied to all applicable Eligible Professionals. Eligible Professionals who do not complete their SRAs by December 31, 2021, and submit their SRA documentation by the January 31, 2022 deadline are subject to audit and may have their incentive recouped.

Note: At this time, Eligible Professionals are not required to submit documentation supporting their eCQMs.

For more information on specific documentation and submission requirements, refer to the Eligible Professionals — Required Documentation page at *www.dhs.wisconsin.gov/ehrincentive/professionals/reqdoc.htm*.

"Eligible Professionals must complete their Security Risk Analysis (SRA) by December 31, 2021, and must submit their SRA documentation by January 31, 2022 .

Audits and Appeals

As a reminder, Eligible Professionals who receive incentive payments from the Wisconsin Medicaid PI Program may be subject to an audit at any time. A failed audit may result in a recoupment of incentive payments. Eligible Professionals are required to retain all relevant supporting documentation used when completing a Wisconsin Medicaid PI Program application for six years post-attestation and submit it to DHS upon request. The Meaningful Use of Certified EHR Technology chapter of the Promoting Interoperability 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 Promoting Interoperability Program section of the Online Handbook.

The information provided in this ForwardHealth Update is published in accordance with 42 C.F.R. §§ 495.24, 495.332, 495.40, 495.370.