

Medicare & Medicaid EHR Incentive Program

Specifics of the Program for Eligible Professionals

August 10, 2010





Today's Session

This training will cover the following topics:

- EHR Incentive Programs a Background
- Who Is Eligible to Participate
- How Much Are the Incentives
- What Are the Requirements/Meaningful Use
- What You Need to Participate
- Timeline of the Programs
- Resources to Get Help and Learn More



What is the EHR Incentive Program?

EHR Incentive Programs were established by law

- American Recovery & Reinvestment Act of 2009
- Incentive programs for Medicare and Medicaid
- Programs for hospitals and eligible professionals
- Must use certified EHR technology AND demonstrate adoption, implementation, upgrading or meaningful use
- Programs differ between Medicare and Medicaid
- Medicare incentive program is federally run by CMS
- Medicaid incentive program is run by States and is voluntary



- Eligibility determined in law
- Hospital-based EPs are NOT eligible for incentives
 - DEFINITION: 90% or more of their covered professional services in either an inpatient (POS 21) or emergency room (POS 23) of a hospital
 - Definition of hospital-based determined in law
- Incentives are based on the individual, not the practice



- Medicare Eligible Professionals include:
 - Doctors of medicine or osteopathy
 - Doctors of dental surgery or dental medicine
 - Doctors of podiatric medicine
 - Doctors of optometry
 - Chiropractors
- Specialties are eligible if meet one of above criteria
- EPs may not be hospital-based



- Eligible Professionals in Medicare Advantage must:
 - Furnish, on average, at least 20 hours/week of patient-care services and be employed by the qualifying MA organization, OR
 - Furnish, on average, at least 20 hours/week of patient care services and be employed by, or be a partner of, an entity that through contract with the qualifying MA organization furnishes at least 80% of the entity's Medicare patient care services to enrollees of the qualifying MA organization AND
 - 80% of professional services are provided to enrollees of the MAO



- Medicaid Eligible Professionals include:
 - Physicians
 - Nurse practitioners
 - Certified nurse-midwives
 - Dentists
 - Physicians assistants working in a Federally Qualified Health Center (FQHC) or rural health clinic (RHC) that is so led by a physicians assistant
- EPs may not be hospital-based



- Medicaid Eligible Professionals must also meet one of the three patient volume thresholds:
 - Have a minimum of 30% Medicaid patient volume
 - Pediatricians ONLY: Have a minimum of 20% Medicaid patient volume
 - Working in FQHC or RHC ONLY: Have a minimum of 30% patient volume attributed to needy individuals
- CHIP, sliding scale, free care only count towards thresholds if working in RHC or FQHC



Who is Eligible to Participate?

 Participation in EHR incentive program and other Medicare incentive programs

Other Medicare Incentive Program	Eligible for HITECH EHR Incentive Program?
Medicare Physician Quality Reporting Initiative (PQRI)	Yes, if the EP is eligible.
Medicare Electronic Health Record Demonstration (EHR Demo)	Yes, if the EP is eligible.
Medicare Care Management Performance Demonstration (MCMP)	Yes, if the practice is eligible. The MCMP demo will end before EHR incentive payments are available.
Electronic Prescribing (eRx) Incentive Program	If the EP chooses to participate in the <u>Medicare</u> EHR Incentive Program, they cannot participate in the Medicare eRx Incentive Program simultaneously in the same program year. If the EP chooses to participate in the <u>Medicaid</u> EHR Incentive Program, they can participate in the Medicare eRx Incentive Program simultaneously.



- Medicare Incentive Payments Overview
 - Incentive amounts based on Fee-for-Service allowable charges
 - Maximum incentives are \$44,000 over 5 years
 - Incentives decrease if starting after 2012
 - Must begin by 2014 to receive incentive payments.
 Last payment year is 2016.
 - Extra bonus amount available for practicing predominantly in a Health Professional Shortage Area
 - Only 1 incentive payment per year



- Medicare Incentive Payments Detail
 - Columns = first calendar year EP receives a payment
 - Rows = Amount of payment each year if continue to meet requirements

	CY 2011	CY 2012	CY 2013	CY2014	CY 2015 and later
CY 2011	\$18,000				
CY 2012	\$12,000	\$18,000			
CY 2013	\$8,000	\$12,000	\$15,000		
CY 2014	\$4,000	\$8,000	\$12,000	\$12,000	
CY 2015	\$2,000	\$4,000	\$8,000	\$8,000	\$0
CY 2016		\$2,000	\$4,000	\$4,000	\$0
TOTAL	\$44,000	\$44,000	\$39,000	\$24,000	\$0



- Health Professional Shortage Area Bonuses for Medicare Incentive Program
 - Columns = first calendar year EP receives a payment
 - Rows = Amount of payment each year if continue to meet requirements

	CY 2011	CY 2012	CY 2013	CY2014	CY 2015 and later
CY 2011	\$1,800				
CY 2012	\$1,200	\$1,800			
CY 2013	\$800	\$1,200	\$1,500		
CY 2014	\$400	\$800	\$1,200	\$1,200	
CY 2015	\$200	\$400	\$800	\$800	\$0
CY 2016		\$200	\$400	\$400	\$0
TOTAL	\$4,400	\$4,400	\$3,900	\$2,400	\$0

- Medicaid Incentive Payments Overview
 - Maximum incentives are \$63,750 over 6 years
 - Incentives are same regardless of start year
 - The first year payment is \$21,250
 - Must begin by 2016 to receive incentive payments
 - No extra bonus for health professional shortage areas available
 - Incentives available through 2021
 - Only 1 incentive payment per year



- Medicaid Incentive Payments Detail
 - Columns = first calendar year EP receives a payment
 - Rows = Amount of payment each year if continue to meet requirements

	CY 2011	CY 2012	CY 2013	CY 2014	CY 2015	CY 2016
CY 2011	\$21,250					
CY 2012	\$8,500	\$21,250				
CY 2013	\$8,500	\$8,500	\$21,250			
CY 2014	\$8,500	\$8,500	\$8,500	\$21,250		
CY 2015	\$8,500	\$8,500	\$8,500	\$8,500	\$21,250	
CY 2016	\$8,500	\$8,500	\$8,500	\$8,500	\$8,500	\$21,250
CY 2017		\$8,500	\$8,500	\$8,500	\$8,500	\$8,500
CY 2018			\$8,500	\$8,500	\$8,500	\$8,500
CY 2019				\$8,500	\$8,500	\$8,500
CY 2020					\$8,500	\$8,500
CY 2021						\$8,500
TOTAL	\$63,750	\$63,750	\$63,750	\$63,750	\$63,750	\$63,750



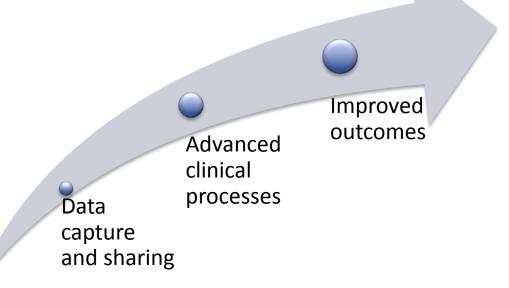
- Meaningful Use is using certified EHR technology to
 - Improve quality, safety, efficiency, and reduce health disparities
 - Engage patients and families in their health care
 - Improve care coordination
 - Improve population and public health
 - All the while maintaining privacy and security
- Meaningful Use mandated in law to receive incentives



- The Recovery Act specifies the following 3 components of Meaningful Use:
 - 1. Use of certified EHR in a <u>meaningful manner</u> (e.g., e-prescribing)
 - Use of certified EHR technology for <u>electronic</u> <u>exchange</u> of health information to improve quality of health care
 - 3. Use of certified EHR technology to submit <u>clinical</u> <u>quality measures</u> (CQM) and other such measures selected by the Secretary



- Rule making was open to public comment
- Listened to many comments received
- Established 3 stages of meaningful use: 2011, 2013 and 2015





What are the Requirements/ Adopt/Implement/Upgrade?

- MEDICAID only for first participation year
- Adopted Acquired and Installed
 - Eg: Evidence of installation prior to incentive
- Implemented Commenced Utilization of
 - Eg: Staff training, data entry of patient demographic information into EHR
- Upgraded Expanded
 - Upgraded to certified EHR technology or added new functionality to meet the definition of certified EHR technology
- Must be certified EHR technology capable of meeting meaningful use
- No EHR reporting period



- Basic Overview of Stage 1 Meaningful Use:
 - Stage 1
 - Reporting period is 90 days for first year and 1 year subsequently
 - Reporting through attestation
 - Objectives and Clinical Quality Measures
 - Reporting may be yes/no or numerator/denominator attestation
 - To meet certain objectives/measures, 80% of patients must have records in the certified EHR technology



- Stage 1 Objectives and Measures Reporting
- Must complete:
 - 15 core objectives
 - 5 objectives out of 10 from menu set
 - 6 total Clinical Quality Measures
 (3 core or alternate core, and 3 out of 38 from menu set)



- Some MU objectives not applicable to every provider's clinical practice, thus they would not have any eligible patients or actions for the measure denominator. Exclusions do not count against the 5 deferred measures
- In these cases, the eligible professional would be excluded from having to meet that measure
 - Eg: Dentists who do not perform immunizations; Chiropractors do not e-prescribe



- 2 types of percentage-based measures for denominator:
 - All patients seen during EHR reporting period
 - Patients or actions taken for patients who records are kept in the certified EHR technology



Eligible Professionals – 15 Core Objectives

- 1. Computerized physician order entry (CPOE)
- 2. E-Prescribing (eRx)
- Report ambulatory clinical quality measures to CMS/States
- 4. Implement one clinical decision support rule
- 5. Provide patients with an electronic copy of their health information, upon request
- Provide clinical summaries for patients for each office visit
- 7. Drug-drug and drug-allergy interaction checks
- 8. Record demographics



- Eligible Professionals 15 Core Objectives (continued)
 - Maintain an up-to-date problem list of current and active diagnoses
 - 10. Maintain active medication list
 - 11. Maintain active medication allergy list
 - 12. Record and chart changes in vital signs
 - 13. Record smoking status for patients 13 years or older
 - 14. Capability to exchange key clinical information among providers of care and patient-authorized entities electronically
 - 15. Protect electronic health information



- Menu objectives must complete 5 of 10
- Eligible Professionals 10 Menu Objectives
 - 1. Drug-formulary checks
 - 2. Incorporate clinical lab test results as structured data
 - 3. Generate lists of patients by specific conditions
 - 4. Send reminders to patients per patient preference for preventive/follow up care
 - Provide patients with timely electronic access to their health information



- Eligible Professionals 10 Menu Objectives (continued)
 - 6. Use certified EHR technology to identify patient-specific education resources and provide to patient, if appropriate
 - 7. Medication reconciliation
 - 8. Summary of care record for each transition of care/referrals
 - Capability to submit electronic data to immunization registries/systems*
 - 10. Capability to provide electronic syndromic surveillance data to public health agencies*



- An Eligible Professional who works at multiple locations, but does not have certified EHR technology available at all of them would:
 - Have to have 50% of their total patient encounters at locations where certified EHR technology is available
 - Would base all meaningful use measures only on encounters that occurred at locations where certified EHR technology is available



- States can seek CMS prior approval to require 4 MU objectives be core for their Medicaid providers:
 - Generate lists of patients by specific conditions for quality improvement, reduction of disparities, research, or outreach (can specify particular conditions)
 - Reporting to immunization registries, reportable lab results, and syndromic surveillance (can specify for their providers how to test the data submission and to which specific destination)



- A Medicare Eligible Professional who does NOT demonstrate meaningful use by 2015 will be subject to payment reductions in their Medicare reimbursement schedule
- Medicaid-only EPs are not subject to payment reductions
- Payment reductions may apply for any EP who accepts Medicare, even if you only participate in the Medicaid EHR incentive program



- Details of Clinical Quality Measures
 - 2011 Eligible Professionals seeking to demonstrate Meaningful Use are required to submit aggregate CQM numerator, denominator, and exclusion data to CMS or the States by ATTESTATION.
 - 2012 Eligible Professionals seeking to demonstrate Meaningful Use are required to electronically submit aggregate CQM numerator, denominator, and exclusion data to CMS or the States.



Clinical Quality Measures – Core Set

NQF Measure Number & PQRI Implementation Number	Clinical Quality Measure Title
NQF 0013	Hypertension: Blood Pressure Measurement
NQF 0028	Preventive Care and Screening Measure Pair: a) Tobacco Use Assessment, b) Tobacco Cessation Intervention
NQF 0421 PQRI 128	Adult Weight Screening and Follow-up



Clinical Quality Measures – Alternate Core Set

NQF Measure Number & PQRI Implementation Number	Clinical Quality Measure Title
NQF 0024	Weight Assessment and Counseling for Children and Adolescents
NQF 0041 PQRI 110	Preventive Care and Screening: Influenza Immunization for Patients 50 Years Old or Older
NQF 0038	Childhood Immunization Status



- Additional set CQM

 must complete 3 of 38
 - 1. Diabetes: Hemoglobin A1c Poor Control
 - 2. Diabetes: Low Density Lipoprotein (LDL) Management and Control
 - 3. Diabetes: Blood Pressure Management
 - Heart Failure (HF): Angiotensin-Converting Enzyme (ACE) Inhibitor or Angiotensin Receptor Blocker (ARB) Therapy for Left Ventricular Systolic Dysfunction (LVSD)
 - 5. Coronary Artery Disease (CAD): Beta-Blocker Therapy for CAD Patients with Prior Myocardial Infarction (MI)
 - 6. Pneumonia Vaccination Status for Older Adults
 - 7. Breast Cancer Screening



- Additional set CQM

 must complete 3 of 38
 - 8. Colorectal Cancer Screening
 - Coronary Artery Disease (CAD): Oral Antiplatelet Therapy Prescribed for Patients with CAD
 - 10. Heart Failure (HF): Beta-Blocker Therapy for Left Ventricular Systolic Dysfunction (LVSD)
 - 11. Anti-depressant medication management: (a) Effective Acute Phase Treatment, (b) Effective Continuation Phase Treatment
 - 12. Primary Open Angle Glaucoma (POAG): Optic Nerve Evaluation



- Additional set CQM

 must complete 3 of 38
 - 13. Diabetic Retinopathy: Documentation of Presence or Absence of Macular Edema and Level of Severity of Retinopathy
 - 14. Diabetic Retinopathy: Communication with the Physician Managing Ongoing Diabetes Care
 - 15. Asthma Pharmacologic Therapy
 - 16. Asthma Assessment
 - 17. Appropriate Testing for Children with Pharyngitis
 - 18. Oncology Breast Cancer: Hormonal Therapy for Stage IC-IIIC Estrogen Receptor/Progesterone Receptor (ER/PR) Positive Breast Cancer



- Additional set CQM

 must complete 3 of 38
 - Oncology Colon Cancer: Chemotherapy for Stage III Colon Cancer Patients
 - 20. Prostate Cancer: Avoidance of Overuse of Bone Scan for Staging Low Risk Prostate Cancer Patients
 - 21. Smoking and Tobacco Use Cessation, Medical Assistance: a) Advising Smokers and Tobacco Users to Quit, b) Discussing Smoking and Tobacco Use Cessation Medications, c) Discussing Smoking and Tobacco Use Cessation Strategies
 - 22. Diabetes: Eye Exam
 - 23. Diabetes: Urine Screening



What are the Requirements/ Clinical Quality Measures

- Additional set CQM

 must complete 3 of 38
 - 24. Diabetes: Foot Exam
 - 25. Coronary Artery Disease (CAD): Drug Therapy for Lowering LDL-Cholesterol
 - 26. Heart Failure (HF): Warfarin Therapy Patients with Atrial Fibrillation
 - 27. Ischemic Vascular Disease (IVD): Blood Pressure Management
 - 28. Ischemic Vascular Disease (IVD): Use of Aspirin or Another Antithrombotic



What are the Requirements/ Clinical Quality Measures

- Additional set CQM

 must complete 3 of 38
 - 29. Initiation and Engagement of Alcohol and Other Drug Dependence Treatment: a) Initiation, b) Engagement
 - 30. Prenatal Care: Screening for Human Immunodeficiency Virus (HIV)
 - 31. Prenatal Care: Anti-D Immune Globulin
 - 32. Controlling High Blood Pressure
 - 33. Cervical Cancer Screening
 - 34. Chlamydia Screening for Women



What are the Requirements/ Clinical Quality Measures

- Additional set CQM

 must complete 3 of 38
 - 35. Use of Appropriate Medications for Asthma
 - 36. Low Back Pain: Use of Imaging Studies
 - 37. Ischemic Vascular Disease (IVD): Complete Lipid Panel and LDL Control
 - 38. Diabetes: Hemoglobin A1c Control (<8.0%)
- Clinical Quality Measures align with Physicians Clinical Quality reporting (PQRI)
- Alignment between 4 HITECH CQM and the CHIPRA initial core set that providers report to States



- All providers must:
 - Register via the EHR Incentive Program website
 - Be enrolled in Medicare FFS, MA, or Medicaid (FFS or managed care)
 - Have a National Provider Identifier (NPI)
 - Use certified EHR technology
 - Medicaid providers may adopt, implement, or upgrade in their first year
- All Medicare providers and Medicaid eligible hospitals must be enrolled in PECOS
 - http://www.cms.gov/EHRIncentivePrograms



- Registration: Medicaid Specific Details
- States will interface with to the EHR Incentive Program registration website
- States will ask providers to provide and/or attest to additional information in order to make accurate and timely payments, such as:
 - Patient Volume
 - Licensure
 - A/I/U or Meaningful Use
 - Certified EHR Technology



- Registration requirements include:
 - Name of the eligible professional
 - National Provider Identifier (NPI)
 - Business address and business phone
 - Taxpayer Identification Number (TIN) to which the provider would like their incentive payment made
 - Medicare or Medicaid program selection (may only switch once after receiving an incentive payment before 2015) for EPs
 - State selection for Medicaid providers



- Certified EHR Technology:
 - Required in order to achieve meaningful use
 - Standards and certification criteria published in final rule on July 13, 2010.
 - ONC in process of authorizing "temporary certification bodies"
 - Certified products are expected to be available in the Fall
 - List of certified EHRs and EHR modules will be posted on ONC web site upon receipt from authorized certification bodies to support providers in identifying certified products



Notable Differences Between Medicare and Medicaid Incentive Programs

Medicare	Medicaid
Federal Government will implement starting in January 2011	Voluntary for States to implement- Most are expected to start by late summer 2011
Payment reductions begin in 2015 for providers that do not demonstrate Meaningful Use	No Medicaid payment reductions
Must demonstrate MU in Year 1	A/I/U option for 1st participation year
Maximum incentive is \$44,000 for EPs (bonus for EPs in HPSAs)	Maximum incentive is \$63,750 for EPs
MU definition is common for Medicare	States can adopt certain additional requirements for MU
Last year a provider may initiate program is 2014; Last year to register is 2016; Payment adjustments begin in 2015	Last year a provider may register for and initiate program is 2016; Last payment year is 2021
Only physicians, subsection (d) hospitals and CAHs	5 types of EPs, acute care hospitals (including CAHs) and children's hospitals



Timeline of the Program

- Fall 2011 Certified EHR technology will be available and listed on website
- January 2011 Registration for the EHR Incentive Programs begins
- January 2011 For Medicaid providers, States may launch their programs if they so choose
- April 2011 Attestation for the Medicare EHR Incentive Program begins
- May 2011 Medicare EHR incentive payments begin



Timeline of the Program

- February 29, 2012 Last day for EPs to register and attest to receive an incentive payment for CY 2011
- 2015 Medicare payment adjustments begin for EPs and eligible hospitals that are not meaningful users of EHR technology
- 2016 Last year to receive a Medicare EHR incentive payment; Last year to initiate participation in Medicaid EHR Incentive Program
- 2021 Last year to receive Medicaid EHR incentive payment



Resources to Get Help and Learn More

 Get information, tip sheets and more at CMS' official website for the EHR incentive programs:

http://www.cms.gov/EHRIncentivePrograms

 Learn about certification and certified EHRs, as well as other ONC programs designed to support providers as they make the transition:

http://healthit.hhs.gov



ONC Programs Designed to Support Achievement of Meaningful Use

Area of Support	ONC Program
Technical Assistance	Regional Extension Center Program: ONC has provided funding for 70 regional extension centers that will help providers with EHR vendor selection and support and workflow redesign. Go to



Resources to Get Help and Learn More - Acronyms

- ACA Patient Protection and Affordable Care Act
- A/I/U Adopt, implement, or upgrade
- CAH Critical Access Hospital
- CCN CMS Certification Number
- CHIPRA Children's Health Insurance Program Reauthorization Act of 2009
- CMS Centers for Medicare & Medicaid Services
- CNM Certified Nurse Midwife
- CPOE Computerized Physician Order Entry
- CQM Clinical Quality Measures
- CY Calendar Year
- EHR Electronic Health Record
- EP Eligible Professional
- eRx E-Prescribing
- FFS Fee-for-service
- FQHC Federally Qualified Health Center
- FFY Federal Fiscal Year
- HHS U.S. Department of Health and Human Services
- HIT Health Information Technology
- HITECH Act Health Information Technology for Economic and Clinical Health Act
- HITPC Health Information Technology Policy Committee
- HIPAA Health Insurance Portability and Accountability Act of 1996

- HPSA Health Professional Shortage Area
- MA Medicare Advantage
- MCMP Medicare Care Management Performance Demonstration
- MU Meaningful Use
- NCVHS National Committee on Vital and Health Statistics
- NP Nurse Practitioner
- NPI National Provider Identifier
- NPRM Notice of Proposed Rulemaking
- OMB Office of Management and Budget
- ONC Office of the National Coordinator of Health Information Technology
- PA Physician Assistant
- PECOS Provider Enrollment, Chain, and Ownership System
- PPS Prospective Payment System (Part A)
- PQRI Medicare Physician Quality Reporting Initiative
- Recovery Act American Reinvestment & Recovery Act of 2009
 - RHC Rural Health Clinic
- RHQDAPU Reporting Hospital Quality Data for Annual Payment Update
- TIN Taxpayer Identification Number