

Electronic Health Record Incentive Program Update August 21, 2015



**Florida Health Information Exchange
Coordinating Committee**



Topics

- Payment Data
- Payments
- Proposed Rule for the 2015 program year
- Proposed Stage 3 Rule



Payments

Payment information as of 7/31/2015:

*EP attestation period for program Year 2014 ended June 30, 2015.
EH attestation period for program year 2014 ended January 31, 2015.

	Eligible Professionals	Eligible Hospitals
Total # of payments	10,797	496
Unique Providers	7097	177
# of payments for MU	3830/2574 unique	336/ 171 unique
# of payments for Stage 2*	21	24
Total payments	\$180,582,585	\$307,664,366.13



Hospital Participation

Program Year 2014 for Hospitals ended 9/30/14. The grace period for submitting attestations ended 1/31/15 with a few exceptions.

Payment Year	2011	2012	2013	2014	2015	Total
1 st payment	111	49	10	6	1	177
2 nd payment		95	58	14		167
3 rd payment			95	57		152
Totals	111	144	163	77	1	
*24 hospitals attested to Stage 2 MU for the 2014 program year						



Program Year 2014 Attestations

- Florida's attestation system upgrades were completed March 20, 2015.
- The grace period ended June 30, 2015.
- As of 7/31/2015 there were 1107 program year 2014 applications remaining to be processed.
- As of 7/31/2015, over 82% of the applications had been reviewed at least one time.



Proposed Rules

- March 30, 2015, the Centers for Medicare and Medicaid Services (CMS) published the Stage 3 proposed rule. Comments were due by May 29, 2015.
- The Office of the National Coordinator (ONC) published the Stage 3 certification rule March 30, 2015. Comments were due by May 29, 2015.
- April 15, 2015, CMS published a proposed rule for the program years 2015, 2016, and 2017. Comments were due by June 15, 2015.



Proposed Rule for 2015 Program Year

- Proposed changes:
 - Shortening the 2015 reporting period to 90 days
 - Realigning hospital reporting periods to the calendar year
 - Changing the measures for 2015 and 2016
 - Deleting measures that have become redundant, duplicative, or “topped out”
 - Moving all providers to Stage 2 measures with exceptions for providers scheduled to attest to Stage 1 measures for 2015 only.
 - All providers attest to one core set of measures.



Proposed Rule for 2015 Program Year

- AHCA will not be able to begin working on the updates for our attestation system until after the final rule is published.
- Providers scheduled for 90 day Meaningful Use attestation for 2015 can attest to current measures until the final rule is published.



Stage 3 Proposed Rule

- Stage 3 would begin for the 2018 program year and require certification to the 2015 edition.
- Providers who implement the 2015 edition certification for 2017 could attest to Stage 3 measures.
- Stage 3 proposed as one core set of objectives and measures for all providers.



Stage 3

- Senate Health, Education, Labor, and Pensions (HELP) committee is asking for a delay for Stage 3
- Many medical advocacy groups are also asking for a delay for Stage 3
- Major issues surround interoperability and provider/hospital readiness for Stage 3 measures



Certification Criteria Proposed Rule

- Moves away from certification of EHRs only for the Meaningful Use program
- ONC Health IT Certification Program will be accessible to health IT for a variety of care and practice settings, various Health and Human Services programs, and public and private interests.
- Moves some of the certification criteria for the Meaningful Use Program to CMS.

