Electronic Health Record Incentive Program Update
November 21, 2014

Florida Health Information Exchange Coordinating Committee

Payments

Payment information as of 11/7/14:

	Eligible Professionals	Eligible Hospitals
total # of payments	9169	435
unique providers	6398	173
# of payments for MU	2862	275
total $ payments	$158,669,549	$291,841,829.58

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Hospital Participation

	2011	2012	2013	2014	2015
New	111	49	10	2	1
2nd PMT		104	56	1	
3rd PMT			97	15	

Eligible Professional Participation

	2011	2012	2013	2014 paid	2014 in review
New	2685	2056	1641	39	43
2nd PMT		941	1243	14	22
3rd PMT			583	11	27
4th PMT					
In review			13		92

4

Participation Years and Payments

- Eligible Professionals (EPs) can receive up to 6 Medicaid payments, Eligible Hospitals for 3 Medicaid payments

- EPs can attest with Medicare or Medicaid and then switch programs once by 12/31/14.

- Medicare EHR Incentive Program ends 2016.

- Medicaid EHR Incentive Program ends 2021. The last year providers can begin is 2016.

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Final Rule on CEHRT flexibility

- Released August 29, 2014
- Effective October 1, 2014
- Rule provisions:
  - Allows some providers to meet meaningful use with EHRs certified to the 2011 or the 2014 Edition criteria, or a combination of both Editions for an EHR Reporting Period in 2014
  - Requires providers to report using 2014 Edition certified EHR technology (CEHRT) for EHR Reporting Period in 2015
  - Extends Stage 2 through 2016

2014 CEHRT flexibility

- Flexibility only available to providers who are **unable to fully implement** 2014 Edition CEHRT for an EHR reporting period in 2014 due to delays in 2014 Edition CEHRT availability

- First-year Medicaid participants must use 2014 Edition CEHRT in order to receive a payment for adopt, implement, or upgrade for 2014 participation

Unable to Fully Implement due to delays in 2014 CEHRT availability

- The delay must be attributable to the issues related to software development, certification, implementation, testing, or release of the product by the EHR vendor which affected 2014 CEHRT availability
  - Examples that do **not** count as delays in availability:
    - Financial Issues
    - Difficulty Meeting Measures
    - Staffing Issues
    - Provider Delays

Attestations

- Florida's attestation system upgrades are expected to be completed in the Spring of 2015.

- Providers who can attest to the 2014 measure for which they were scheduled are encouraged to attest as soon as their reporting period ends.

- Providers who wish to attest to a flexibility option will need to wait until our upgrade is completed.

- The grace period will be extended to June 30, 2015.

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2015 Program Year

- All providers will have to have 2014 CEHRT.
- Providers attesting to their first year of Meaningful Use (MU) will have a continuous 90 day reporting period.
- Providers attesting to their second year of MU must report for the full year.
- Hospital Program Year 2015 began 10/1/14.
- Eligible Professional Program Year 2015 begins 1/1/15.
- Our attestation system is ready for Program Year 2015 attestations.

2015 Program Year

- Providers who are attesting for the 2014 program year during the grace period will not be able to attest for the 2015 program year until the 2014 application is paid.

- We don't know how may providers may wait to attest for the 2014 program year until June 2015.

Medicare Payment Adjustment

- EPs and hospitals avoid the <u>2016</u> payment adjustment by
  - Successfully attesting to MU with Medicaid or Medicare for 2014 program year;
  - Attest to MU for first time for 2015 program year by 7/1/15 for hospitals and 10/1/15 for EP; or
  - Apply for and be granted an exception by CMS.