



Medicaid Electronic Health Records Meaningful Use Audits

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Agenda

- Electronic Health Records Incentive Program
- Eligible Providers
- Participation for HER
- Program Payments
- Audit Strategy
- Post-Payment Audits
- Audit Numbers

Electronic Health Records Incentive Program

- Electronic Health Records Incentive Program
 - Is part of the American Recovery and Reinvestment Act of 2009.
 - Establishing incentive payments to eligible professionals, eligible hospitals, and critical access hospitals.
 - These incentive payments are part of a broader effort under the HITECH Act to accelerate that adoption of HIT and utilization of qualified EHRs.

Who are Eligible Professionals?

- Eligible Professionals
 - Physicians (MDs, Dos)
 - Pediatricians
 - Nurse Practitioners
 - Dentists
 - Certified Nurse Mid-wives
 - Physician Assistants (Pas) when practicing at a Federally Qualified Health Center (FQHC) or a Rural Health Clinic (RCH) led by a physician assistant

Participation Requirements

■ To Participate

- The provider must be a South Dakota Medicaid Provider.
 - Provider would need to meet the requirements to enroll with Medicaid
- Be registered with the CMS EHR Incentive Program Website.
- Obtain the CMS EHR Certification Number.
- Eligible Professionals must meet a 30 percent patient volume, with the exception of Pediatricians who must meet a 20 percent patient volume.
- Have documentations to adopt, implement, upgrade to a certified Electronic Health Record, Verification documents include a signed contract, user agreement, purchase order, receipt, or license agreement
- Attest with the South Dakota Medicaid EHR Incentive Payment Program.

Attestations

- Adopt, Implement or Upgrade
 - EPs and EHs can attest to AIU in their first year of the program
- Meaningful Use
 - EPs and EHs can attest to MU in their first year
 - Provider will have core objectives and menu measures that will need to be met with there attestations.

Payments to Date

- Eligible Professionals Attesting to AIU
 - 365 Providers
 - \$7,614,590.00
- Eligible Professionals Attesting to MU
 - 353 Providers
 - \$3,016,086.00
- Eligible Hospitals Attesting to AIU
 - 32 Providers
 - \$14,509,318.47
- Eligible Hospitals Attesting to MU
 - 54 Providers
 - \$20,396,848.71
- Grand Total
 - 804 Providers
 - \$45,536,843.18

South Dakota Audit Strategy

- South Dakota's Audit Strategy
 - Recent Audit Strategy was Approved on August 17, 2015
- Meaningful Use Audits Contracted
 - Conducts Stage 1 and Stage 2 Meaningful Use audits on Medicaid Eligible Providers

Who is Subject to Audits

- Providers who receive an Electronic Health Record incentive payment for either the Medicare or Medicaid EHR Incentive Program potentially may be subject to an audit.
 - Audits to be Conducted
 - At minimum, DMS will conduct audits on at least 10% of all providers receiving incentive payments.
- Meaningful Audit Stages
 - Stage 1 MU attestations from the fall of 2012
 - Stage 2 MU from providers in 2014
 - Stage 3 MU will start in 2017

What is Meaningful Use?

- “Meaningful use” means providers need to show the EHR technology is being used in ways that can be measured significantly in quality and results.
- 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
- Provider will use certified EHR technology:
 - In a meaningful manner, such as e-prescribing

Post-Payment Audits

- Post-Payment Audits
 - Initially conducted as desk audits
- AIU Audits
 - Risk Assessment
 - Types of Documents to be looked at
 - Patient encounters
 - Discharges
 - Acute Medicaid days
 - Charity care charges
 - Standard EHR reports supporting meaningful use adherence (such as exclusion documentation, EHR reports, ect)
 - EHR certification documents
 - Other supporting documents could be requested

Post-Payment Audits

- Meaningful Use Audits
 - Dual Eligible Hospitals will be audited by CMS
 - Eligible Professionals- Audited by HealthTech
 - Risk Assessment
 - Risk score will factor into who may get audited
 - Meaningful Use Core and Menu measure audits primarily target measures with high control risk where verification data is available
 - Audit Initiation
 - EP chosen for and audit will be notified via letter.
 - Conduct of the Audit
 - The review process usually reveal the need for additional documents

Completed Meaningful Use Audits

- HealthTech is our MU Audit Contractor
 - 12 Audits were completed in the first year
 - 2 Audits have been completed this year
 - Currently have 12 MU Audits in progress

Questions?

- CMS Electronic Health Records:
 - <https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/index.html?redirect=/EHRIncentivePrograms/>
- South Dakota Electronic Health Records Incentive Program
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