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
    - 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 their 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
“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, etc)
    - 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:

- South Dakota Electronic Health Records Incentive Program
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