



pennsylvania

DEPARTMENT OF PUBLIC WELFARE

Office of Medical Assistance Programs

Electronic Health Record (EHR) Incentive Program

Auditing Webinar

August 26, 2013



Agenda

- **Program Update**
- **Medical Assistance Auditing Update/
Guidelines**
- **Questions**



Medical Assistance HIT Incentive Program

- **Matt McGeorge**, OMAP HIT Coordinator
- **Brian Lentes**, Bureau of Program Integrity HIT Liaison

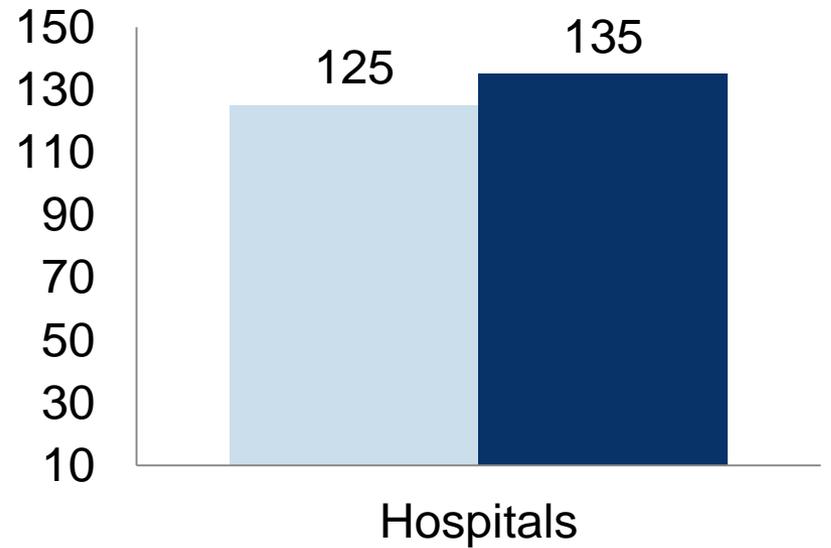
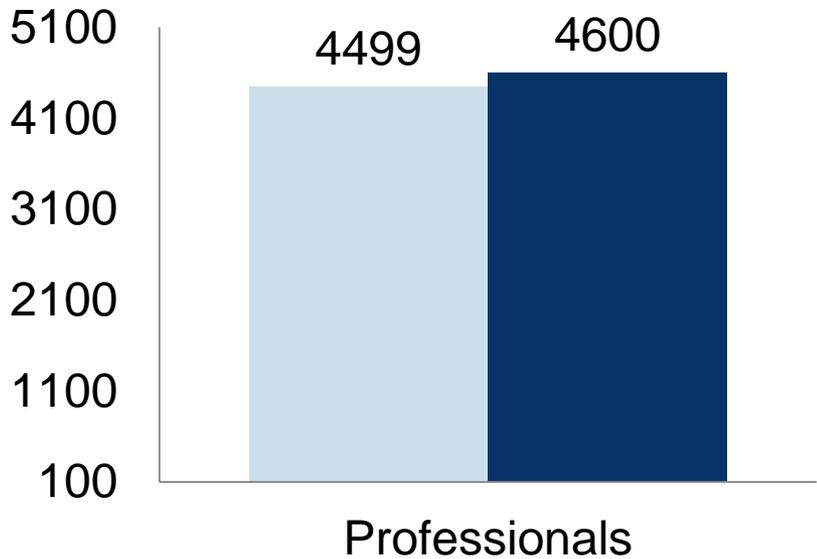
Program Update: National Payments



	State	Medicaid Payment Total		State	# of Paid Provider	% of Provider Return 2012
1	California	\$ 611,581,749	1	California	11,081	27%
2	Texas	\$ 519,356,432	2	Texas	7,867	39%
3	New York	\$ 389,144,764	3	New York	7,455	41%
4	Florida	\$ 338,166,045	4	Florida	6,193	35%
5	Ohio	\$ 220,460,178	5	Ohio	5,594	43%
6	Illinois	\$ 216,078,872	6	Pennsylvania	5,593	47%
7	Pennsylvania	\$ 212,089,897	7	Massachusetts	5,416	55%
8	Massachusetts	\$ 171,056,177	8	Washington	4,941	37%
9	Washington	\$ 169,708,873	9	Tennessee	3,444	34%
10	Louisiana	\$ 169,455,693	10	North Carolina	3,357	33%

Totals above are through June 2013 and source is CMS EHR incentive program

Program Update: Payments



■ Received 1st Payment ■ Estimate

■ Received 1st Payment ■ Estimate

Professional: 98%

Hospital: 93%

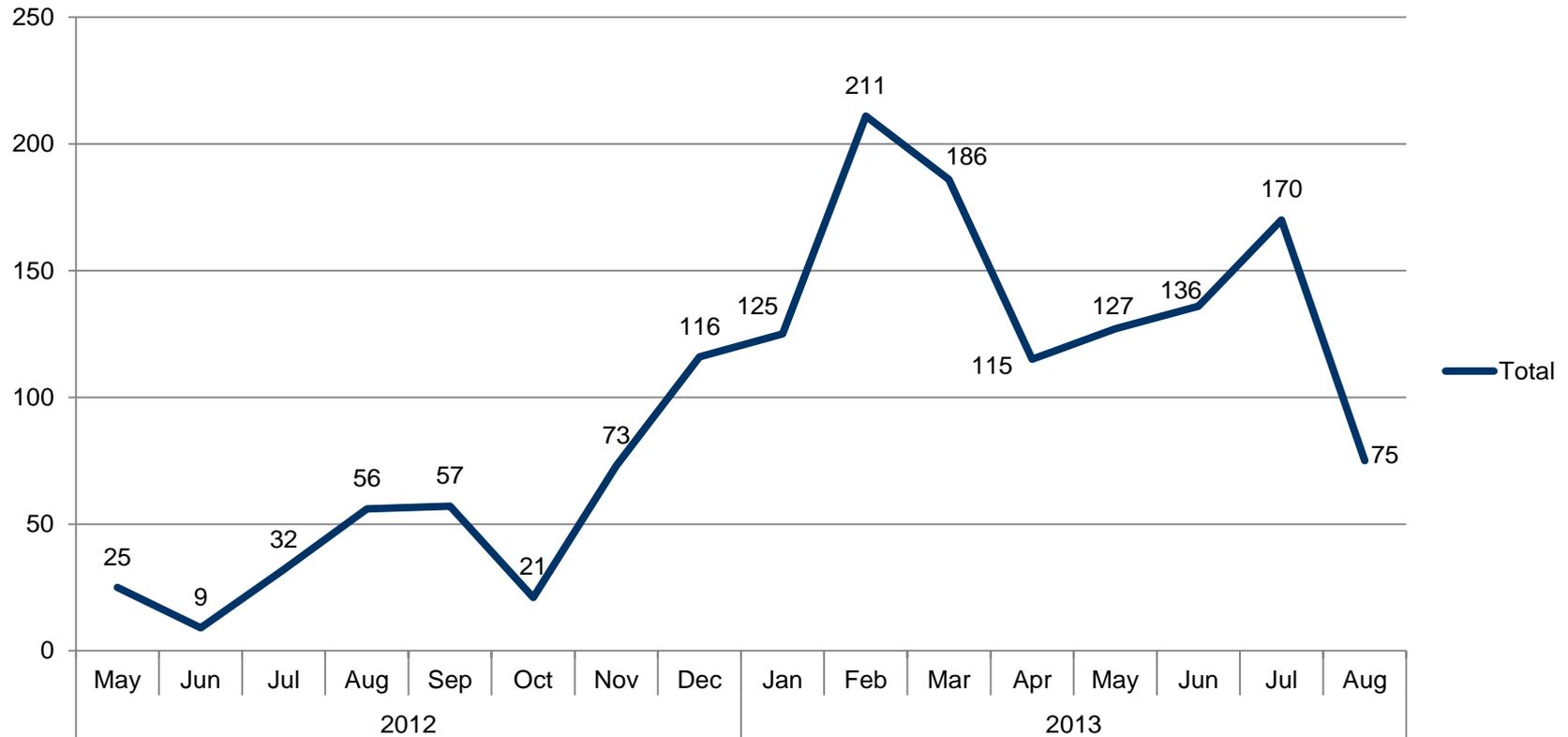
Total Professional Payments*:
\$ 105,897,375

Total Hospital Payments*:
\$118,432,853

Total Payments* - \$ 224,330,228

* Payments through August 19, 2013 for first (EP- 4499, EH-125) and second (EP - 1473, EH - 65) payments

Total EP MU Payments



Through August 19, 2013

IMPORTANT 2014 REQUIREMENTS

- All Eligible Hospitals (EHs) and Eligible Professionals (EPs) who are attesting to Meaningful Use (MU) to Medicaid in Program Year 2014 will attest to **90 days MU** regardless of what MU attestation was completed prior to 2014
- In order to participate in the EHR Incentive Program in 2014, it is required that a Certified 2014 system be utilized for all attestations in 2014

OFFICE OF THE NATIONAL COORDINATOR FOR HEALTH INFORMATION TECHNOLOGY CERTIFIED EHR SYSTEM

If you would like to see a list of the
2014 Certified EHR Systems, go to:

<http://oncchpl.force.com/ehrcert/ehrproductsearch>

AUDITING INTRODUCTION

- **Why do we do Audits?**
 - **To ensure a high-quality and efficient health information technology program**
 - **Required by the Final Rule**

AUDITING INTRODUCTION

- **When do we do Audits?**
 - **Audits began in the Fall of 2011**
 - **Audits are performed throughout the year**

AUDITING INTRODUCTION

- **Who conducts the Audits?**
 - The audits are completed by members of the PA Medicaid Health Information Technology Team
 - The Medicaid Audit is a different process and a different auditing team than the Medicare Audit

AUDITING INTRODUCTION

- **How are the Audits Conducted?**
 - **Auditing could involve desk review, field or other mechanism**
 - **The auditing team works with the providers to determine the best method for the audit process**
 - **Best Practice group provided input on auditing process**

AUDITING INTRODUCTION

- **Who is Audited?**
 - The auditing team has a process to determine who is audited
 - Providers are subject to audit for each year they participate
 - Medicare will audit Eligible Hospitals' Meaningful Use attestations

EHR INCENTIVE PROGRAM PROCESS

- 1. Register at the CMS R&A website**
- 2. Complete the PA MAPIR application**
- 3. Pre-payment Review Process**
 - The program works with the applicants to obtain validation documentation to complete the application process**
- 4. Application approved/denied**
- 5. Payment made if approved**
- 6. All approved applications are considered for an audit**

AUDIT PROCESS

1. The program identifies the providers who will be contacted to go through the audit process
2. The contact on the MAPIR application will receive an email from RA-MAPIRAudit@pa.gov

NOTE: The audit email may be sent securely, so you would have to complete a few steps in order to receive the email. Also, sometimes these emails go into Junk/SPAM folders so be sure to check those folders for any correspondence from us.

3. The provider will have 60 days to submit the information requested in the email

AUDIT PROCESS (cont.)

- 4. Once the information is received by the program, the auditing team will validate the information**
- 5. The auditing team will work with the providers to ensure appropriate documentation is provided**
- 6. The auditing team reviews documentation provided and determines if audit is passed or failed**
- 7. Provider will receive notification via email of results and instructions**

AUDIT DOCUMENTATION

Support/Validate the provider applications

Validation Request	Documentation Accepted
<p>MA Patient Volume</p>	<p>A patient encounter volume detail report is required. A sample report can be found at http://www.dpw.state.pa.us/ucmprd/groups/webcontent/documents/report/p_011933.pdf</p>
<p>Certified EHR System Validation</p>	<p>Proof of financially or legally securing access to certified EHR technology:</p> <ul style="list-style-type: none"> •Signed contract or user agreement between EP and vendor OR; •Signed lease between EP and vendor OR; •Receipt of purchase or paid invoice AND; <p>•A signed vendor letter with the CMS EHR system ID Certification number</p> <p>A sample vendor letter can be found at: http://www.dpw.state.pa.us/ucmprd/groups/webcontent/documents/document/p_022830.pdf</p>

AUDIT DOCUMENTATION

Support/Validate the provider applications

Validation Request	Documentation Accepted
Pediatrician Validation	A copy of the board-certification document, pediatric or combined medicine-pediatric residency training certificate, or a letter from the facility where the provider successfully received 12 months of training with children under the age of 21 years old
Group MA Patient Volume Validation	List of all providers who performed services on all patients during the 90 day period. If the EP is not in the group for the 90 day period, provide a signed attestation that the EP treats MA patients.
Hospital-Based Eligible Professional	MA patient encounter volume from the entire preceding year which is to verify that 90 percent or more of your covered MA professional services is not in a hospital setting during the year.

AUDIT DOCUMENTATION (cont.)

How are the results of the Audit process Used

1. Improve our processes
2. Enhance correspondence to providers
3. Share with other Departments within the Commonwealth
4. Share with CMS

AUDITING MEANINGFUL USE

In addition to the auditing of eligibility requirements that has already been discussed in this presentation, we will also audit the Meaningful Use measures for applications that have received Meaningful Use payments.

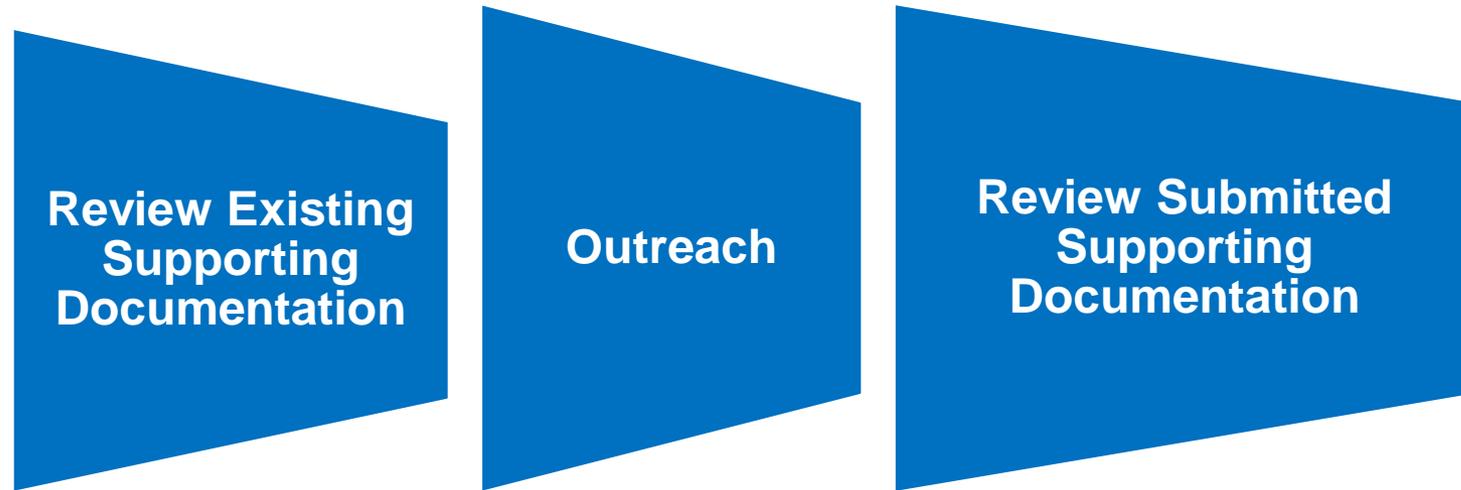
AUDITING MEANINGFUL USE

Why are we auditing Meaningful Use (MU) Measures?

Strategy: To combat fraud and abuse, encourage meaningful use of Certified EHR Systems, and assist with promoting HIT initiatives to increase affordable access to quality healthcare

1. Confirm that the EHR incentive payments were appropriately disbursed
2. Facilitate providers with MU of Certified EHR Systems
3. Determine the likelihood that systems can align with other HIT initiatives that support the exchange of information

AUDITING MEANINGFUL USE



Program Determines what is considered sufficient “supporting documentation” according to:

- CMS input
- PA Best Practices Group
- Program Integrity best practices

SUFFICIENT SUPPORTING DOCUMENTATION FOR MEANINGFUL USE MEASURES

The auditing of the Meaningful Use measures is part of our new strategy that we will be presenting to CMS.

Supporting documentation varies dependent on measure:

- Meaningful Use Reports documenting the attestations that were generated from the provider's EHR system
- Screenshots of the operation occurring that is related to the measure, AND process or methodology of the operation
- Specific Reports documenting the actions related to the measure during the encounter (i.e. drug interaction checks)
- Proof of exclusion
- MU Supplement Survey

SUFFICIENT SUPPORTING DOCUMENTATION EXAMPLES

CPOE for Medication Orders

Measure	Description	Exclusion	Supporting Doc.	Supporting Doc.
CPOE for Medication Orders	More than 30% of unique patients with at least one medication in their medication list seen by the EP or admitted to the eligible provider or CAH have at least one medication entered using CPOE.	Any EP who writes fewer than 100 prescriptions during the EHR reporting period.	Meaningful Use Reports documenting the attestations that were generated from the provider's CEHRT, OR	Proof of exclusion: Report demonstrating that Exclusion was met.

Drug Interaction Checks

Measure	Description	Exclusion	Supporting Doc.	Supporting Doc.
Drug Interaction Checks	Implement Drug-Drug and Drug-Allergy Interaction Checks	N/A	Report showing when the drug-drug and drug-allergy interaction checks occurred. A single report submitted for Group of applying providers can be used, however, report needs to be broken down by provider name and NPI, OR	Screenshots of the drug-drug and drug-allergy interaction checks in operation. A single report submitted for Group of applying providers can be used, however, report needs to be broken down by provider name and NPI, AND Process or methodology of how the drug-drug and drug-allergy interaction check operate.

SUFFICIENT SUPPORTING DOCUMENTATION EXAMPLES

MU Supplement Survey – Here is an excerpt from the survey

Meaningful Use (MU) Supplement Survey

Meaningful Use Auditing Information

This document is designed to assist us in understanding how you are meaningfully using (MU) your Certified Electronic Health Record Technology. Providing this information will help us understand the attestation process.

Your eligibility for incentive payment may not be impacted by the information provided in this document but we need this additional information to have a comprehensive understanding of your MU attestation.

Thank you for taking the time to complete this survey.

***1. Please enter all provider names and their NPIs that are associated with this MU supplement survey.**

***2. Are you using another electronic health record (EHR) system along with your attested to certified EHR?**

Yes

No

If selected Yes, please explain how the systems interface with one another.

***3. Does your EHR have issues with recording any of the following as structured data?**

Smoking status

Problem lists

Active medication lists

Active medication allergy lists

Demographics

Vital signs

No issues

SUPPORTING DOCUMENTATION

How to get supporting documentation to the Program

- DIRECT Messaging Account:
PADPW-OMAP-MAHEALTHIT@directaddress.net
- MAPIR Application Upload: You will have the opportunity to upload your supporting documentation directly into the MAPIR application
- Email: Audit Resource Account: RA-MAPIRaudit@pa.gov
- Program's DocuShare site (upon request)

APPEALS AND COLLECTION OF OVERPAYMENTS

- Providers will have the right to appeal certain Department decisions related to the MA EHR Incentive Program. Examples of appeal reasons include, but are not limited to the following:
 - Applicant is determined ineligible for the EHR Incentive Program due to sanctions;
 - Applicant volume of Medical Assistance encounters do not meet the minimum threshold for an incentive payment;
 - Appeal of incentive payment amount, (e.g., pediatrician payment).
- the Department initiates the payment recoupment process
- The Department requests that providers submit recoupment payments by check within 90 calendar days
- the Department generates an accounts receivable to offset payment of future claims if check is not received

HELPFUL HINTS

- It is easiest to generate and save MU Reports at the time of attestation.
- Submit your Eligibility and MU Reports to the program at the time of the application.
- By meeting the Meaningful Use requirements through the Medicaid EHR Incentive Program you will avoid the Medicare payment adjustments.
- Privacy and Security Assessment – make sure your risk assessment is kept up to date.
- Check with your vendor on the status of their 2014 certification.
- Provide the program with a list of all NPIs/EPs associated with certified EHR technology that you are attesting to.

Meaningful Use Resources



CMS MU resources

www.cms.gov/EHRIncentivePrograms

Measure specification sheets

MU Calculator

Frequently Asked Questions



[Website](#)
pamahealthit.org

[Listserv](#)
Weekly updates via email

[Webinars](#)
Upcoming Stage 2 Webinar TBD

[Support Center](#)
RA-mahealthit@pa.gov

