

Medicaid EHR Incentive Program

Timelines for Program Year 2020 and Program Year 2021

October 2020

Today's presenters:
Margaret Lellman
Thomas Bennett

Disclaimer

This presentation was current at the time it was presented, published or uploaded onto the web. This presentation was prepared as a service to the public and is not intended to grant rights or impose obligations. This presentation may contain references or links to statutes, regulations, or other policy materials. The information provided is only intended to be a general summary. It is not intended to take the place of either the written law or regulations. We encourage attendees to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of their contents.

Announcement

MAPIR is **now open** for
Program Year 2020 applications

Goals of This Session

This session is designed to:

- help you understand the program timelines and requirements for Program Years 2020 and 2021
- communicate the reason behind the accelerated program timelines, adjusted attestation periods, and early deadlines
- convey a sense of urgency while minimizing stress and anxiety
- enable you to successfully participate in the final two years of the Medicaid EHR Incentive Program

Agenda

- Background
 - Program Timeline and Example Scenarios
 - Attestation Tail
 - Program Sunset
- Timelines: PY2020 and PY2021
- Quick Review: The Validation Process
- If You Have 1 Payment Year Left
- If You Have 2 Payment Years Left
- Things to Consider
 - Program Year 2020
 - Program Year 2021
- Questions

Background

- The Medicaid EHR Incentive Program began in 2011
- Meaningful Use is now known as Promoting Interoperability
 - the terms are interchangeable
 - CMS updated the name of the program to better reflect the goal
- EPs can potentially earn up to **\$63,750** over 6 years of program participation
 - participation years do not need to be consecutive and EPs can skip years without penalty
- The last year to initiate participation was 2016
- The program will sunset in 2021
 - by law, all EHR Incentives must be paid by **December 31, 2021**

Program Timeline and Example Scenarios

	First Payment in 2011	First Payment in 2012	First Payment in 2013	First Payment in 2014	First Payment in 2015	First Payment in 2016
Payment Amount in 2011	\$21,250					
Payment Amount in 2012	\$8,500	\$21,250				
Payment Amount in 2013	\$8,500	\$8,500	\$21,250			
Payment Amount in 2014	\$8,500	0	0	\$21,250		
Payment Amount in 2015	\$8,500	\$8,500	\$8,500	\$8,500	\$21,250	
Payment Amount in 2016	\$8,500	\$8,500	\$8,500	\$8,500	\$8,500	\$21,250
Payment Amount in 2017	0	\$8,500	\$8,500	\$8,500	\$8,500	\$8,500
Payment Amount in 2018	0	\$8,500	\$8,500	0	\$8,500	\$8,500
Payment Amount in 2019	0	0	0	0	\$8,500	\$8,500
Payment Amount in 2020	0	0	\$8,500	\$8,500	\$8,500	\$8,500
Payment Amount in 2021	0	0	0	\$8,500	0	\$8,500
TOTAL	\$63,750	\$63,750	\$63,750	\$63,750	\$63,750	\$63,750

Attestation Tail

In the past, each Program Year included an “attestation tail” that began on January 1st and extended until March 31st of the following year.

- Deadline extensions were granted for some Program Years, but regardless of any extensions, EPs have always had at least 3 months of the following year to attest.
- Program Years 2020 & 2021 will no longer include the traditional attestation tail which makes the information shared on the subsequent slides extremely important.



Program Sunset

Understanding the rationale for the PY2020 and PY2021 deadlines

The federal law that established the EHR Incentive Program requires that all incentives be paid by December 31, 2021.

To allow time to process applications and ensure that all incentives are **paid** by **December 31, 2021**, the PY2021 deadline needs to be well before the end of 2021.

To prepare for Program Sunset at the end of 2021:

- adjustments were made to the deadlines for both PY2020 and PY2021
- MAPIR was updated to allow more than one active application to be open simultaneously.*
 - In order to have two applications open simultaneously, an EP must have at least **two payment years** left.

* This applies to PY2020 and PY2021. Although the deadline for PY2019 was extended, EPs cannot have a PY2019 application and a PY2020 application open at the same time. An EP's PY2019 application must be completed (paid) before they can launch their PY2020 application.

Timelines: PY2020 and PY2021

The attestation periods and deadlines for PY2020 and PY2021 are very different from previous years.

The Program Year 2020 attestation period is scheduled for
October 1, 2020 – February 2, 2021

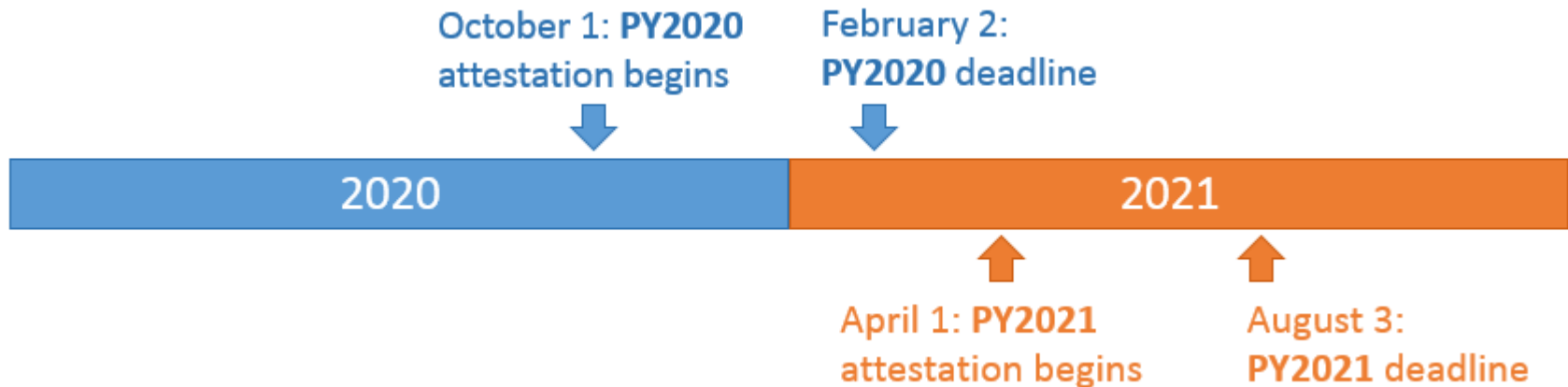
The deadline to submit PY2020 applications is **February 2, 2021**

The Program Year 2021 attestation period is scheduled for
April 1, 2021 – August 3, 2021

The deadline to submit PY2021 applications is **August 3, 2021**

There is no attestation tail for PY2021 that extends into early 2022.
All PY2021 applications must be submitted by August 3, 2021.

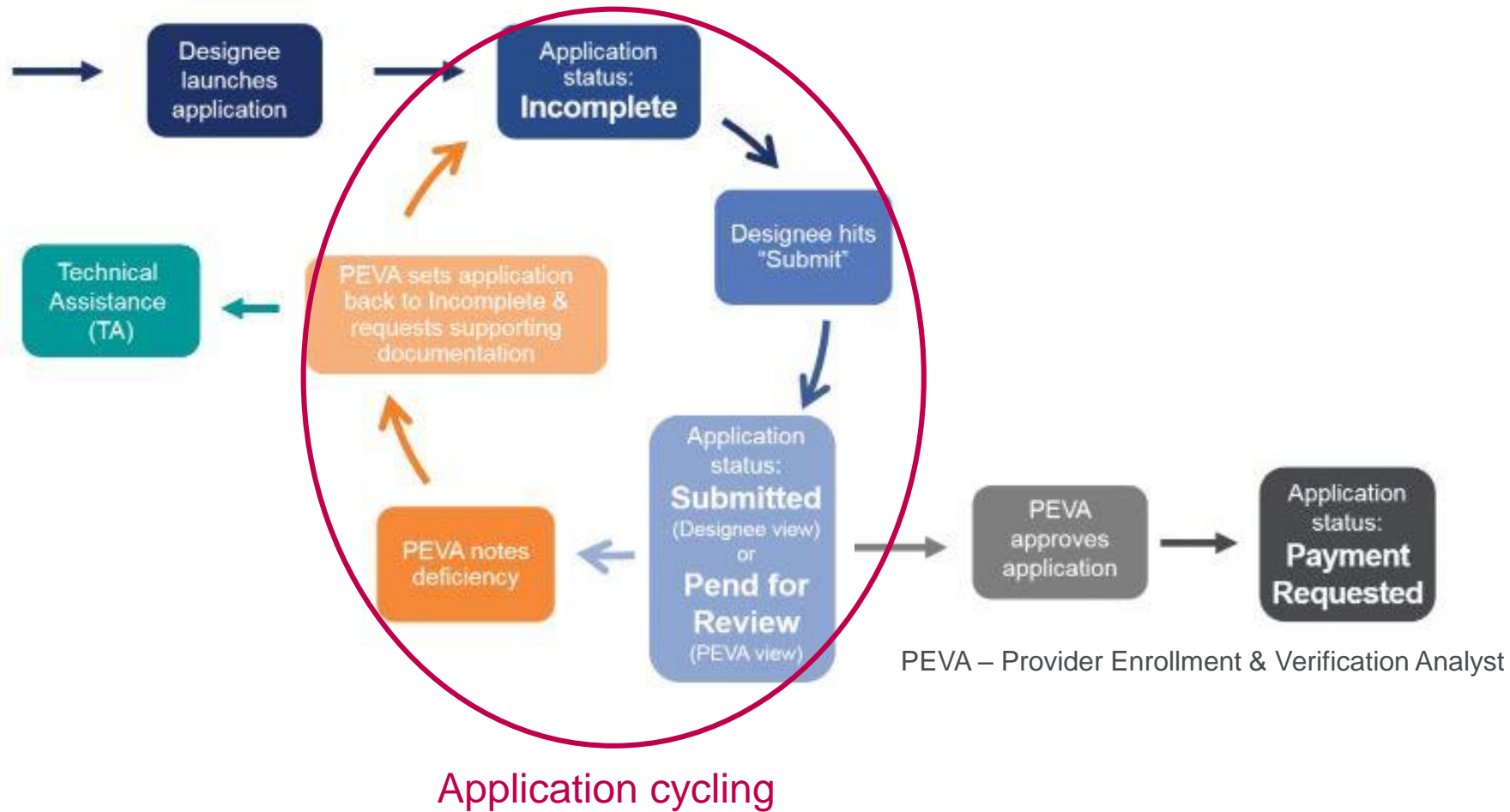
Timelines: PY2020 and PY2021



We understand these timelines will be challenging for EPs.

- these timelines are necessary to meet the statutory deadline for all incentives to be paid
- over the next several slides, we will offer recommended steps to complete your application(s) on time and receive your full incentive payment(s)
- we are here to answer questions and assist you in submitting your application(s) and supporting documentation in a timely fashion

A Quick Review of the Validation Process



PEVA – Provider Enrollment & Verification Analyst

If You Have 1 Payment Year Left

For EPs who only have 1 year left, we recommend that you:

- (1) Carefully select which year to attest to and focus entirely on that year, **or**
- (2) Focus on attesting to PY2020 (keep in mind: if needed, you do have the option to abort your PY2020 application and attest to PY2021 instead).

If You Have 1 Payment Year Left – Digging Deeper

Step 1: Select Which Program Year to Attest to

- There are pros and cons to both Program Years.
 - Attesting to PY2020 allows you to attest earlier and have more time to resolve potential issues.
 - Keep in mind that you cannot begin your PY2020 application until your PY2019 application is finalized and paid.
 - Planning to attest to PY2021 allows you more time to prepare for attestation and avoid potential issues altogether, but the timelines are even tighter than PY2020.
- More considerations for each Program Year will be covered later in this presentation.

If You Have 1 Payment Year Left – Digging Deeper

Step 2: Abort Your PY2020 Application (if needed)

- If you abort your PY2020 application so you can attest to PY2021 instead, you must abort your PY2020 application **and** submit your PY2021 application **before** the PY2021 deadline of **August 3, 2021**.
- Since you only have 1 payment year left, MAPIR will not give you the option to launch two applications simultaneously.

If You Have 2 Payment Years Left

For EPs who have 2 payment years left, we recommend that you:

- (1) Complete and submit your PY2020 application by the PY2020 deadline of **February 2, 2021**.
- (2) Launch and complete your PY2021 application between **April 2, 2021** and **August 3, 2021**.
- (3) Resolve any discrepancies with your PY2020 application as quickly as possible.
- (4) If needed, abort your PY2020 application as soon as possible, so we can move on to reviewing your PY2021 application.

If You Have 2 Payment Years Left – Digging Deeper

Step 1: Complete and Submit Your PY2020 Application

- Submit your application by the PY2020 deadline of **February 2, 2021**.
- Additional considerations for PY2020 applications will be covered later in the presentation.

If You Have 2 Payment Years Left – Digging Deeper

Step 2: Launch Your PY2021 Application

- To access a PY2021 application, an EP must have **submitted*** their PY2020 application by the PY2020 deadline of **February 2, 2021**.
- MAPIR allows EPs in this scenario to have two active applications open at the same time.
 - the EP's PY2020 application **does not** have to be approved/paid before launching their PY2021 application.

* “submitted” means the you have hit the Submit button at least once. If you submit your PY2020 application and then a PEVA sets it back to Incomplete, that still counts as “submitted.”

If You Have 2 Payment Years Left – Digging Deeper

Step 3: Resolve Issues With Your PY2020 Application

- The PEVA team will work on PY2020 applications first before moving on to PY2021.
- Our TA team is available to help you with your PY2020 application and reduce application cycling.
- If you submit your PY2021 application while your PY2020 application is still incomplete, the PY2021 application will remain in either Submitted/Incomplete status until your PY2020 application is either approved for payment or aborted.

If You Have 2 Payment Years Left – Digging Deeper

What if you attest to PY2020 but validation shows that you can't actually meet the Meaningful Use Requirements?

Step 4: Abort Your PY2020 Application As Soon As Possible

- You don't necessarily need to abort your PY2020 application before the PY2021 deadline (August 3, 2021) but keep in mind:
 - your PY2021 application cannot be approved until your PY2020 application is either approved or aborted.
 - we need to fully process your PY2021 application **and issue payment** before **December 31, 2021**.
- If you end up needing to abort your PY2020 application, the sooner you do so, the better, so we can start validating your PY2021 application.

Program Year 2020 – Things to Consider

2020

- All EPs will have a 90-day reporting period for CQMs
- All EPs must demonstrate that an SRA/SRR was completed **within the calendar year**
 - If you've already completed your SRA/SRR for PY2020, you can attest now
 - If you plan to attest before the end of this year, keep in mind that you need to complete your SRA/SRR **prior to attestation**
 - *For example, if you plan to attest on November 1, 2020, you would need to complete your SRA/SRR by October 31, 2020. You cannot submit your application on November 1, 2020 and then complete your SRA/SRR in December 2020.*

Program Year 2021 – Things to Consider

- All EPs will have a 90-day reporting period for CQMs.
- PVT reporting periods cannot overlap.
 - The **August 3, 2021** deadline means there are limited options for a 90-day PVT reporting period if the EP selects from the 12 months prior to attestation.
 - The best strategy to avoid potential overlap is to select a PVT reporting period from the previous calendar year for both PY2020 and PY2021.
- EPs will be allowed to complete an SRA/SRR after the date of attestation but must pledge to complete it by the end of calendar year 2021. Designees will be required to attest as such in MAPIR (see next slide).

2021

Program Year 2021 – Things to Consider

- The screenshot below highlights the pledge to complete an SRA/SRR by December 31, 2021.

2021

Objective 1 - Protect Patient Health Information

Click [HERE](#) to review CMS Guidelines for this measure.

Click the **Save & Continue** to proceed, Click **Return to Main** to access the main attestation topic list, Click **Clear All Entries** to remove entered data.

(*) Red asterisk indicates a required field.

Objective: Protect electronic protected health information (ePHI) created or maintained by the Certified EHR Technology (CEHRT) through the implementation of appropriate technical, administrative, and physical safeguards.

Measure: Conduct or review a security risk analysis in accordance with the requirements under 45 CFR 164.308(a)(1), including addressing the security (including encryption) of data created or maintained by Certified EHR Technology in accordance with requirements under 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), implement security updates as necessary, and correct identified security deficiencies as part of the provider's risk management process.

*Did you meet this measure prior to the date of attestation?
 Yes No

If 'Yes', please enter the following information:

Date (MM/DD/YYYY):

Name and Title (Person who conducted or reviewed the security risk analysis):

If 'No' is answered above: Do you attest you will complete your Security Risk Analysis (SRA) no later than the end of day, December 31, 2021 and understand your incentive payment will be subject to recoupment for failure to do so?
 Yes No

Timelines Guide

For more information, see the new
[Timelines for PY2020 and PY2021 Guide](#)

Questions

Questions?

Contact Us

MeHI

MASSACHUSETTS
eHEALTH INSTITUTE



at the MassTech
Collaborative



mehi.masstech.org



1.855.MassEHR



ehealth@masstech.org



Follow us @MassEHealth

Thomas Bennett

Client Services Relationship Manager

tbennett@masstech.org

(508) 870-0312 ext. 403

Margaret Lellman

Technical Assistance Specialist

lellman@masstech.org

(508) 870-0312 ext. 370