

Getting a CMS Electronic Health Record Certification Identification Number

Idaho Medicaid Electronic Health Record (EHR) Incentive Program Created March 2012

Note to Providers: There is a good possibility that business processes will change after the program is launched. Potential efficiencies as well as potential problems are likely to become evident. This paper describes the business as of spring 2012. Please be sure to return to the information on the website and in the provider handbook often for updates. Creation dates will be noted on each paper.

Introduction

The Medicare and Medicaid EHR Incentive Programs require the use of certified EHR technology. Standards, implementation specifications, and certification criteria for EHR technology have been adopted by the Secretary of the Department of Health and Human Services. The EHR technology in use by the provider must be tested and certified by an Office of the National Coordinator (ONC) Authorized Testing and Certification Body (ATCB) in order for that provider to qualify for EHR incentive payments. Once certified, the product will be listed on the ONC website, often referred to as the CHPL, where you may obtain its unique CMS EHR certification ID. This certification ID must be provided as part of the application/attestation process for either the Medicare or Medicaid incentive program.

Getting a Centers for Medicare and Medicaid Services (CMS) EHR Certification ID

Eligible professionals, eligible hospitals and critical access hospitals can obtain a CMS EHR Certification ID by following these steps:

1. Go to the ONC CHPL website: <http://healthit.hhs.gov/chpl>.
2. Select your practice type by selecting the Ambulatory or Inpatient buttons.
3. Search for EHR Products by browsing all products, searching by product name or searching by criteria met.
4. Add product(s) to your cart to determine if your product(s) meet 100% of the CMS required criteria.
5. Request a CMS EHR Certification ID for CMS attestation.
NOTE: The "Get CMS EHR Certification ID" button will not be activated until the products in your cart meet 100% of the CMS required criteria. If the EHR products do not meet 100% of the CMS required criteria to demonstrate meaningful use, a CMS EHR Certification ID will not be issued.
6. The CMS EHR Certification ID contains 15 alphanumeric characters.

Important Clarifications

- The Product Number issued to your vendor for each certified technology is different than the CMS EHR Certification ID. Only a CMS EHR Certification ID obtained through the CHPL will be accepted at application/attestation to Idaho Medicaid.
- Certification by the Commission for Health Information Technology Certification, more commonly known as CCHIT certification, is not sufficient to qualify you for an EHR incentive payment. The product must be certified by an ONC-Authorized Testing and Certification Body specifically for the Medicare and Medicaid EHR Incentive Programs and listed on the ONC website.
- You do not need to have your certified EHR technology in place to register for the EHR incentive programs. However, you must adopt, implement, upgrade to a certified EHR system under the Medicaid EHR Incentive Program or successfully demonstrate meaningful use of certified EHR technology under the Medicare EHR Incentive Program before you can receive an EHR incentive payment.
- On the ONC website on certified products you can access the Final Rules related to certification standards, find fact sheets, frequently asked questions, a list of ONC-Authorized Testing and Certification Bodies, as well as a wealth of information about certified products and obtaining certification.

Related Frequently Asked Questions from CMS's Website

1. *How do I know if my EHR system is certified? How can I get my EHR system certified?*

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The Medicare and Medicaid EHR Incentive Programs require the use of certified EHR technology, as established by a new set of standards and certification criteria. Existing EHR technology needs to be certified by an ONC-Authorized Testing and Certification Body (ONC-ATCB) to meet these new criteria in order to qualify for the incentive payments. The Certified Health IT Product List (CHPL) is available at <http://www.healthit.hhs.gov/CHPL>. This is a list of complete EHRs and EHR modules that have been certified for the purposes of this program.

Through the temporary certification program, new certification bodies have been established to test and certify EHR technology. Vendors can submit their EHR products to the certifying bodies to be tested and certified. Hospitals and practices who have developed their own EHR systems or products can also seek to have their existing systems or products tested and certified. Complete EHRs may be certified as well as EHR modules that meet at least one of the certification criteria. Once a product is certified, the name of the product will be published on the ONC web site: <http://www.healthit.hhs.gov/CHPL>. For more information, please visit the Office of the National Coordinator's website at <http://healthit.hhs.gov/certification>.

2. *Must providers have their EHR technology certified prior to beginning the EHR reporting period in order to demonstrate Meaningful Use under the Medicare and Medicaid EHR Incentive Programs?*

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No. An EP or hospital may begin the EHR reporting period for demonstrating Meaningful Use before their EHR technology is certified. Certification need only be obtained prior to the end of the EHR reporting period. However, Meaningful Use must be completed using the capabilities and standards outlined in the ONC Standards and Certification Regulation for certified EHR technology. Any changes to the EHR technology after the beginning of the EHR reporting period that are made in order to get the EHR technology certified would be evidence that the provider was not using the capabilities and standards necessary to accomplish Meaningful Use because those capabilities and standards would not have been available, and thus, any such change (no matter how minimal) would disqualify the provider from being a meaningful EHR user. If providers begin the EHR reporting period prior to certification of their EHR technology, they are taking the risk that their EHR technology will not require any changes for certification. Any changes made to gain certification must be done prior to the beginning of the EHR reporting period during which Meaningful Use will be demonstrated. This does not apply to changes made to EHR technology that were not necessary for certification.

- 3. My EHR system is CCHIT certified, does that mean it is certified for the EHR Incentive Programs?*

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No. All EHR systems and technology must be certified specifically for this program. The Certified Health IT Product List is available at <http://www.healthit.hhs.gov/CHPL>. This is a list of all complete EHRs and EHR modules that have been certified for the purposes of this program.

The Medicare and Medicaid EHR Incentive Programs require the use of certified EHR technology, as established by a new set of standards and certification criteria. Existing EHR technology needs to be certified by an ONC-Authorized Testing and Certification Body (ONC-ATCB) to meet these new criteria in order to qualify for the incentive payments. Through the temporary certification program, new certification bodies have been established to test and certify EHR technology. Vendors can submit their EHR products to the certifying bodies to be tested and certified. Hospitals and practices who have developed their own EHR systems or products can also seek to have their existing systems or products tested and certified. Complete EHRs may be certified as well as EHR modules that meet at least one of the certification criteria. Once a product is certified, the name of the product will be published on the ONC web site – <http://www.healthit.hhs.gov/CHPL>.

- 4. If a provider purchases a certified Complete EHR or has a combination of certified EHR Modules that collectively satisfy the definition of certified EHR technology, but opts to use a different, uncertified EHR technology to meet certain meaningful use core or menu set objectives and measures, will that provider be able to successfully demonstrate meaningful use under the Medicare and Medicaid EHR Incentive Programs?*

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No, the provider would not be able to successfully demonstrate meaningful use. To successfully demonstrate meaningful use, a provider must do three things:

1. Have certified EHR technology capable of demonstrating meaningful use, either through a complete certified EHR or a combination of certified EHR modules;
2. Meet the measures or exclusions for 20 Meaningful Use objectives (19 objectives for eligible hospitals and Critical Access Hospitals (CAHs)); and
3. Meet those measures using the capabilities and standards that were certified to accomplish each objective.

A provider using uncertified EHR technology to meet one or more of the core or menu set measures would not be using the capabilities and standards that were certified to accomplish each objective. Please note that this does not apply to the use of uncertified EHR technology and/or paper-based records for purposes of reporting on certain meaningful use measures (i.e., measures other than clinical quality measures), which is addressed in FAQ #10589.

Additional Information

For questions about this or other issues concerning the Idaho EHR Incentive Program, please go to www.MedicaidEHR.dhw.idaho.gov. There you will find an “Ask the Program” feature that will allow you to send questions to program staff. You can also call the Idaho Medicaid EHR Program Helpdesk at (208) 332-7989.