

## IDAHO MEDICAID ELECTRONIC HEALTH RECORDS (EHR): TIMELINES FREQUENTLY ASKED QUESTIONS

| Question  | Answer   |
|---|--|
| <p><b>1. What is the difference between a program year and a payment year for eligible professionals (EPs)?</b></p> | <ul style="list-style-type: none"> <li>• Program year refers to the calendar year (January–December) of EHR program operation. Idaho’s program began July 2012; therefore, the first program year ends December 31, 2012. Idaho’s second program year will span calendar year (January-December) 2013. Patient volume is based on a 90-day period in the calendar year <b>prior</b> to the program year. Applications for payment must be made within the program calendar year. Consecutive program participation is not a requirement of the Idaho Medicaid EHR Incentive Program.</li> <li>• Payment year refers to the year of program participation for which an EP receives payment. For the first payment year, EPs have to demonstrate that they have adopted, implemented, or upgraded (AIU) to a certified EHR system. The second payment year will require 90 days of meaningful use. Subsequent payment years will require 365 days of meaningful use in a calendar year for EPs and 365 in a federal fiscal year (FFY) for eligible hospitals (EHs).</li> </ul> |
| <p><b>2. What is the difference in all the timeframes referenced in the program requirements?</b></p>               | <p>There are two distinct timeframe requirements within the Idaho Medicaid EHR Incentive Program:</p> <ul style="list-style-type: none"> <li>• Volume Reporting Timeframe: For EPs, this is the consecutive, 90-day period in the calendar year prior to the application year during which time they meet the Medicaid patient volume requirement. For EHs, it is a 90-day period in the prior fiscal year. Children’s hospitals do not have to meet the patient volume requirement.</li> <li>• Meaningful Use Attestation Timeframe: EPs attest to AIU in the first payment year. In the second payment year, the first year an EP attests to meaningful use, they must document a 90-day period of actually using the system in the payment year. All EHs follow a similar pattern unless they have already attested to meaningful use for the Medicare program in which case, they are deemed a meaningful user for Medicaid and the incentive for the first payment year from Medicaid is for meaningful use.</li> </ul>   |

| Question   | Answer  |
|--|---|
| <p><b>3. If a hospital receives their first AIU payment in 2012, when can they apply for a meaningful use payment?</b></p> | <p>This assumes the hospital has not received a Medicare EHR incentive payment and is pursuing a first year AIU Medicaid EHR incentive payment. If a hospital receives a 2012 payment for AIU based on 2011 information, the first meaningful use payment would have to be based on a 90-day meaningful use period from FFY 2012 and application could be as early as October 2012 (in FFY 2013). The second meaningful use reporting period of 365 days would be from FFY 2013 and application could be made beginning October 2013 (in FFY 2014).</p>   |
| <p><b>4. What is the window of time a provider is allowed to attest for 2012?</b></p>                                      | <p>You have until 60 days into the new year to attest and be validated as eligible by Idaho for the previous year. This is commonly referred to as the 'tail period' and can be considered simply an extension of the attestation year to allow providers the opportunity to compile their documentation for attestation.</p> <p><b>Note:</b> the new year is defined as a calendar year (CY) for EPs and a FFY for EHs. For example, a physician may attest for AIU on January 15, 2013 and Idaho validates their eligibility before March 2, 2013 (for 2012); the payment disbursed will be for the attested year of 2012. In addition, the physician also has the opportunity to attest in 2013 for meaningful use after meeting the 90-day meaningful use requirements in 2013.</p>   |
| <p><b>5. When do I have to have my application completed in order to qualify for a 2012 EHR incentive payment?</b></p>     | <p>This will depend on if you are applying as a professional or a hospital. Here are important program dates for a 2012 program year EHR incentive payment:</p> <ul style="list-style-type: none"> <li>• November 29, 2012 – Last day for EHs and critical access hospitals to register and attest to receive an incentive payment for FFY 2012. This date accounts for a 60-day 'tail' period at the end of the FFY. Eligible hospital patient encounter data is always drawn from the previous completed FFY when applying/attesting.</li> <li>• February 28, 2013 – Last day for EPs to register and attest to receive an incentive payment for CY 2012. This date accounts for a 60-day 'tail period' at the end of the CY. Eligible professional patient encounter data is always drawn from the previous completed CY when applying/attesting.</li> </ul> |

| Question  | Answer  |
|---|---|
| <p><b>6. What are important dates to remember?</b></p>  | <p>These are important program dates for the Idaho Medicaid EHR Incentive Program:</p> <ul style="list-style-type: none"> <li>• Summer of 2012–2021 is the Idaho Medicaid EHR Incentive Program period.</li> <li>• Late Spring/Early Summer 2012 – the recipient of the EHR incentive payment should start signing up as a vendor for the state of Idaho.</li> <li>• July 2, 2012 – Application/attestation began in the Idaho Incentive Management System (IIMS).</li> <li>• Late Summer 2012 – Incentive payments began 45 days after provider eligibility has been determined.</li> <li>• December 31, 2016 – Last date to begin participation.</li> </ul> |
| <p><b>7. Which cost report years do I use to gather data for my application?</b></p>  | <p>If your reporting year end is after September 30, 2012, use cost report years 2008-2011. If your reporting year ends on or before September 30, 2012, use cost report years 2007-2010.</p>   |
| <p><b>8. What is a payment year for hospitals?</b></p>  | <p>Hospital payment years are based on the FFY, running from October 1 – September 30. As of Idaho's EHR implementation date of July 2, 2012, we were in FFY 2012, which would be considered your first payment year. The second payment year would be FFY 2013, beginning in October 2012. The patient volume qualifying period for an EH must be a 90-day period in the previous FFY.</p>   |
| <p><b>9. Can physicians in the same group enter the incentive program at different times?</b></p>   | <p>Yes.</p>   |
| <p><b>10. Can their year one of the program begin at a later time than the actual start of the first year of the incentive program?</b></p> | <p>Yes.</p>   |

| Question   | Answer  |
|--|---|
| <b>11. Do I have to apply for the Idaho Medicaid incentive payment in 2012?</b>    | No, you may apply when you are ready to register and attest. The last year to apply for the incentive payment is 2016.  |
| <b>12. Can an EP skip one or more years and, if so, must they be consecutive?</b>  | Yes, an EP may skip more than one year and they do not need to be consecutive years. However, they must start participation no later than 2016 and no payments will be made after 2021.   |
| <b>13. Why would a provider opt to skip a year?</b>                                | A provider may decide to attest to AIU in the first year and then may not be quite ready in the second year to attest to 90 days of meaningful use. A provider may also change their place of employment and may go to an office that is not quite ready to participate in the program and decide to wait until that office is ready to participate.  |
| <b>14. When, and how often, are EP payments made?</b>                              | EPs may receive the first year payment in Idaho as early as July 2012; but no later than 2016. Payments after the first payment year may continue for a maximum of five years for a total of six yearly payments. EPs may receive payments on non-consecutive years and there is no penalty for not completing the full six years of the program. No payments will be made after CY 2021. Medicaid EPs can receive an incentive payment from only one state in a payment year.  |
| <b>15. When, and how often, are EH payments made?</b>                              | <p>Payments in Idaho began July 2012. An incentive payment to an EH is subject to the following conditions:</p> <ul style="list-style-type: none"> <li>• The EH incentive payment in Idaho will be provided over a three year period.</li> <li>• No EH may begin receiving incentive payments for any year after FFY 2016 and an EH may not receive an incentive payment after this date unless it received an incentive payment in the prior fiscal year.</li> <li>• Prior to FFY 2016, payments can be made to an EH on a non-consecutive, annual basis for a fiscal year. Medicaid EHs must receive an incentive payment in FFY 2016 in order to receive an incentive payment in FY 2017 and later years.</li> </ul> |
| <b>16. Can an EH receive both the Medicare and Medicaid EHR incentive payment?</b> | Yes. An EH that meets the requirements for both the Medicare and Medicaid EHR incentive payments may simultaneously participate in and receive payments from both programs.   |

| Question   | Answer   |
|--|--|
| <b>17. Can an EP receive both the Medicaid and Medicare EHR incentive payment?</b>   | No. EPs may receive an incentive payment from either Medicaid or Medicare, but not both during the same CY. EPs can switch between the Medicare and Medicaid incentive programs once during the incentive program. Changes between the programs are counted only after a program payment has been made. The last year for making an incentive program switch is CY 2014. |
| <b>18. If a provider qualifies for the Idaho Medicaid EHR Incentive Program the first year but not the second, can the provider switch to the Medicare Incentive Program in year two and beyond?</b> | Yes. A provider can switch to Medicaid or Medicare once during the life of the program. Changes between the programs are counted only after a program payment has been made. However, after you have switched, you will not be able to change programs again.  |
| <b>19. When does the Idaho Medicaid EHR Incentive Program begin?</b>   | The Idaho Medicaid EHR Incentive Program was launched on July 2, 2012.   |
| <b>20. When will Idaho begin accepting applications for program year two?</b>  | It is anticipated that Idaho will be ready to accept year two applications in summer of 2013.  |
| <b>21. How long must source documents for the data reported for determining incentive program eligibility be retained?</b>   | Documentation that verifies attestation should be kept for six years after an incentive payment related to the attestation has been received.  |
| <b>22. Can an Idaho Medicaid EHR Incentive Program determination be appealed?</b>  | Yes. If an EP or EH receives a preliminary determination that may be adverse to their application, or they do not agree with the incentive payment amount, they may request an informal review by initiating an appeal.  |

| Question  | Answer   |
|---|--|
| <b>23. Will a provider who doesn't enroll in either the Medicaid or Medicare incentive program or who doesn't meet meaningful use requirements be penalized?</b>                      | Medicaid reimbursements will not be affected. Only providers receiving incentives through Medicare will be penalized for not meeting meaningful use requirements. Providers can choose to opt out of both incentive programs, but will receive a reduction in Medicare reimbursement if they do not meet meaningful use standards by 2015. |
| <b>24. Since my EHR system is federally certified, can I receive an incentive payment for AIU and an incentive payment for meeting meaningful use in the same participation year?</b> | No. EPs and EHRs may only receive one payment per participation year.  |