

**MOA MEMBERS
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MEDICARE/MEDICAID EHR INCENTIVE PAYMENT UPDATE

Some important HIT updates yesterday from ONC Office of National Coordinator for Health Information Technology follows. The first part is on the “exemptions” from the meaningful use requirements. The second part is on the status of state Medicaid incentive programs. The third part is on certification.

A discussion of some of these issues is available here:

<http://www.tvworldwide.com/events/hhs/101214/>

CMS has posted updated answers to FAQs here:

http://www.cms.gov/EHRIncentivePrograms/95_FAQ.asp#TopOfPage

This website has been revised and is more informative now. I think this is where we should direct a lot of our member inquiries.

<http://www.cms.gov/EHRIncentivePrograms/>

Registration for the Medicare and Medicaid incentives will begin January 3. Registration will not be available for Medicaid incentives until your state launches its program.

1) Exemptions.

As we know, all physicians are supposed to meet 20 out of 25 requirements of meaningful use. There are 15 core requirements for everyone. From the menu of the remaining 10 requirements, doctors can defer 5. CMS will allow doctors to defer requirements that are not relevant to the practitioner – the often cited example is a dentist not having to meet the requirement on immunizations so that the number of actual deferrals may be higher than 5. CMS has specified that the exemptions depend on whether the doctor has any patients in the “denominator” of the measure. The exclusions are spelled out requirement by requirement here:

<http://www.cms.gov/EHRIncentivePrograms/Downloads/EP-MU-TOC-Core-and-MenuSet-Objectives.pdf>

2) State Medicaid plans

CMS administers Medicare incentives, states voluntarily administer Medicaid incentives. CMS will begin reporting which states have Medicaid incentive programs. As of today, this is the status:

- 11 states expected to launch programs in January: AK, IA, KY, LA, MI, MS, NC, OK, SC, TN, TX
- 4 of those states expected to begin making payments as soon as the end of January: IA, KY, LA, OK
- 9 states have approved (and 9 more pending) State Medicaid HIT plans: AL, IA, LA, OK, PA, SC, TN, TX, WI
- 9 states have approved (and 8 more pending) implementation funding documents: AL, LA, OK, SC, TN, YX, WI, “MAPIR”

It remains AOA's understanding that plans can update their State Medicaid HIT Plans at any time to add optometry. In the first year in Medicaid, the requirement is merely to adopt/implement/upgrade to a certified EHR. As far as we know, the South Carolina plan is the first and only one to include ODs.

3) HIT certification.

CMS continues to require physicians to have EHRs that can accomplish all 25 requirements regardless of whether the doctor is going to defer performance on one or more of the measures. In other words, a modular EHR product for optometrists that is not certified to be able to do the immunization requirement would mean the doctor would need some other product certified for the immunization component.