

## The Path to Payment for the Medicare and Medicaid EHR Incentive Programs

In 2009, programs were authorized under Medicare and Medicaid to provide incentive payments to health care providers who meet eligibility requirements and demonstrate meaningful use of certified electronic health record (EHR) technology.<sup>i</sup> The Centers for Medicare & Medicaid Services (CMS) wants to help providers along the “path to payment” as they adopt and use certified EHR technology. By learning the right information and necessary steps, providers can meet the program requirements and receive incentive payments.<sup>ii</sup>

As an eligible professional (EP) you may be eligible for either the Medicare or Medicaid EHR Incentive Programs, but you must choose which program you will participate in when you register. Before 2015, an EP may switch programs only once after the first incentive payment is initiated. Eligible hospitals may participate in both programs but must choose “Both Medicare and Medicaid” when they register to maintain this option. Each program has different steps that EPs and hospitals must take to qualify for incentive payments.

You can use CMS’ interactive [Eligibility Wizard](#) as an easy way to learn for which program you can register. The wizard will walk you through a few “yes” or “no” questions to assist you in determining your eligibility.

### Medicare EHR Incentive Program Checklist

As an EP or an eligible hospital, you have to successfully demonstrate meaningful use of certified EHR technology to qualify for incentive payments from Medicare.

- 1. Check your eligibility and register.** To qualify, you need to make sure you are [eligible](#) for the Medicare EHR Incentive Program and [register](#) for the program through CMS’ web-based system. CMS encourages you to register as soon as possible, even if you don’t have certified EHR technology installed yet.
- 2. Check whether your existing EHR technology is certified, or select certified EHR technology to purchase.** To receive incentive payments, you also need to make sure the EHR technology you are using or are considering buying has been [certified](#) by one of the Office of the National Coordinator for Health Information Technology’s (ONC) Authorized Testing and Certification Bodies. Certified EHR technologies are listed at <http://onc-chpl.force.com/ehrcert>.
- 3. Demonstrate meaningful use through attestation.** You must successfully demonstrate meaningful use for a consecutive 90-day reporting period in your first year of participation (and for a full year in each subsequent year) to receive EHR incentive payments. Visit CMS’ [meaningful use page](#) to learn about meaningful use objectives and measures. To get EHR incentive payments, you must [attest](#) (legally state) through Medicare’s secure website that you have demonstrated meaningful use of certified EHR technology.

#### Attestation Resources

- The Attestation User Guides (for [EPs](#) and [eligible hospitals and CAHs](#)) provide step-by-step guidance once you begin the attestation process.
- If you need to check on your likelihood of meeting the meaningful use guidelines *before* starting attestation, you can use the [Meaningful Use Attestation Calculator](#) to do just that. It also prints a copy of your measure summary.

**Note:** In the first year of participation, it is important to remember that the 90-day reporting period for Medicare participants is used to show that you have been successfully meeting meaningful use requirements for that 90-day consecutive period. The actual incentive payment amount is calculated for EPs based on estimated allowed charges for covered professional services furnished by the EP during the entire calendar year. For eligible hospitals, the incentive payment amount is based on a number of factors beginning with a \$2 million base payment (multiplied by a Medicare share).

### **Medicaid EHR Incentive Program Checklist**

If you are an EP or an eligible hospital participating in the Medicaid EHR Incentive Program, you may adopt, implement, or upgrade certified EHR technology, or become a meaningful user of certified EHR technology, to qualify for Medicaid incentive payments in the first participation year.

- 1. Check your eligibility and register.** Just like Medicare EHR Incentive Program participants, to participate in the Medicaid EHR Incentive Program you first need to make sure you are eligible. However, a preliminary step is to visit the [Medicaid State Information web page](#) to see if your state has begun participation in the Medicaid EHR Incentive Program. The Medicaid State Information web page also contains links to the web pages of all states' EHR Incentive Programs where you can find more information about your state's incentive program.
  - If your state is already participating in the Medicaid EHR Incentive Program, you can register. If you are an EP and your state's EHR Incentive Program has not yet launched, you will not be able to complete registration or receive an EHR incentive payment until your state's program launches. If you represent an eligible hospital, and your state's EHR Incentive Program has not yet launched at the time of your registration, your Medicaid registration will be placed into a "Pending State Validation" status until your state's program is launched. You will not be able to complete registration or receive an EHR incentive payment until your state's program is launched.
- 2. Check whether your existing EHR technology is certified, or select certified EHR technology to purchase.** To get your EHR incentive payment, make sure the EHR technology you are using or are considering buying has been [certified](#) by one of ONC's Authorized Testing and Certification Bodies. Certified EHR technologies are listed at <http://onc-chpl.force.com/ehrcert>.
- 3. Adopt, implement, upgrade, or demonstrate meaningful use of certified EHR technology.** To receive EHR incentive payments in the first year under the Medicaid EHR Incentive Program, you must do at least one of the following:
  - Adopt certified EHR technology;
  - Implement certified EHR technology you have already acquired;
  - Upgrade your current EHR technology to the newly certified version;
  - Demonstrate "meaningful use" of certified EHR technology for a consecutive 90-day reporting period. Participants should visit their state's Medicaid agency website or CMS' [meaningful use page](#) to learn about meaningful use objectives and measures.

### **Need more information?**

Take advantage of the resources CMS has created to help you achieve meaningful use of certified EHR technology by visiting the CMS EHR website at <https://www.cms.gov/ehrincentiveprograms/>. In

addition, other programs related to the CMS EHR Incentive Programs – such as the Regional Extension Centers (REC) – have been created to provide technical assistance in EHR adoption and demonstration of meaningful use. To learn more about how RECs can help EPs and hospitals, please visit the website of the Office of the National Coordinator for Health Information Technology at <http://healthit.gov>.

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<sup>i</sup> The Medicare and Medicaid Electronic Health Record (EHR) Incentive Programs were authorized under the Health Information Technology for Economic and Clinical Health (HITECH) Act, part of the American Recovery and Reinvestment Act of 2009. The programs provide incentive payments to eligible professionals, eligible hospitals and critical access hospitals (CAHs) as they adopt, implement, upgrade, or demonstrate “meaningful use” of certified EHR technology in ways that improve quality, safety, and effectiveness of patient-centered care. Under the Medicare EHR Incentive Program, eligible professionals can receive as much as \$44,000 over a consecutive five-year period. Under the Medicaid EHR Incentive Program, eligible professionals can receive as much as \$63,750 over six years. Under both the Medicare and Medicaid EHR Incentive Programs, millions of dollars are available for eligible hospitals and CAHs that satisfy program requirements.

<sup>ii</sup> This article provides guidance to professionals and hospitals that may be eligible for EHR incentive payments. However, we urge readers to refer to the regulations for definitive rules on eligibility, payment, and other requirements. To the extent anything in this guidance conflicts with such rules and regulations, our rules and regulations would take precedence. Regulations are available at: [http://www.cms.gov/EHRIncentivePrograms/60\\_RegulationsNotices.asp#TopOfPage](http://www.cms.gov/EHRIncentivePrograms/60_RegulationsNotices.asp#TopOfPage)

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