



PROVIDER ALERT

Medicaid HITECH Guidance Regarding PY 2015 MU Attestation and 2016/2017 Payment Adjustments

After deliberations between Medicare and Medicaid Program managers, we would like to offer the following consolidated and clarifying guidance to State Medicaid EHR Incentive Program administrators on PY 2015 MU attestation and 2016/2017 payment adjustments. Hopefully this comprehensive guidance will alleviate any concern for states and providers.

For Program Year 2015 (PY 2015), Medicaid Eligible Professionals (EPs) no longer have to attest to Meaningful Use (MU) on or before the end date for CMS Medicare PY 2015 attestation period, 3/11/16, in order to avoid 2016 or 2017 Medicare payment adjustments.

Medicaid EPs may wait until their respective Medicaid States can accept attestations, and then attest to Medicaid MU for PY 2015 through their Medicaid State EHR Incentive program. State Medicaid Administrators will generate their States' MU Data batch files, listing ALL Medicaid EPs achieving MU for PY 2015, and upload these files to the CMS-NLR by the CMS deadline (to be shared once available) or as soon as feasibly possible once the approved tail period ends and the state is ready to submit. The Medicaid HITECH Team will work closely with states who need extended time beyond the batch file deadline as we approach that date.

Please be assured that once these Medicaid MU records are in the NLR, the Medicaid EPs who have attested to MU for PY 2015 will either:

- Never get scheduled for Medicare payment adjustments in 2016 and 2017, OR
- Will have any 2016/2017 Medicare payment adjustments that are already scheduled/in-progress reversed

Note – Medicaid EPs who obtain an AIU incentive payment for PY 2015 have not achieved MU for PY 2015, and are thus subject to Medicare payment adjustments. There is NO new policy behind this – 1st-year participating Medicaid EPs in PY 2013 and PY 2014 who received the AIU payment did get

Several Medicaid EPs have already successfully completed the Alternate Medicare MU attestation for PY 2015. These EPs face no extra difficulties whatsoever. In fact, this group of providers have already avoided Medicare payment adjustments in 2016 and 2017. Further, these EPs can proceed with doing Medicaid MU attestation for PY 2015 with their respective Medicaid States in order to obtain the PY 2015 Medicaid Incentive payments.

There will be no extra challenges in processing the Medicaid Incentive payments for these EPs at CMS-NLR. The D-18 will be sent from the State to the NLR to record incentive payments and will be processed as usual from the States' SLR perspective. On the NLR end, automated processes make sure that for a Medicaid EP in a given Program Year, any prior attestation record from completion of the Alternate Medicare MU attestation is deleted as soon as a Medicaid Incentive payment (for MU or AIU) is reported by the D-18 from the State to the NLR for the Medicaid EP.

Note – If the Medicaid Incentive payment is for AIU in PY 2015, after the Medicare MU attestation record is deleted the Medicaid EP will become subject to Medicare payment adjustments in 2016/2017. Medicaid EPs who have received a Medicaid Incentive payment that has been reported by D-18 to the NLR will not even be able to access or attempt the Alternate Medicare MU attestation at the CMS Registration & Attestation UI (CMS RNA); the EP will be politely informed a Medicaid Incentive payment has been recorded for the same Program Year already.

The Alternate Medicare MU attestation, done by Medicaid EPs with Medicare program, remains available only during the Medicare attestation period.

For PY 2015, Medicare attestation period is scheduled to end 03/11/16. In case further guidance is required about the Alternate Medicare attestation process, see the Information Sheet titled 'Alternate Medicare attestation for Medicaid EPs updated v4_20160309' that is available on the Medicaid HITECH Technical Assistance (TA) Portal (<http://www.medicaidhitechta.org/> Home > Resource Library > [NLR Documentation](#))

We apologize for any confusion related to PY 2015 MU attestation and 2016/2017 payment adjustments to this point and hope that the above information provided more clarity.

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