

Washington State EHR Incentive Program
WHITE PAPER #3: Payment Reassignment

Updated May 2018

OVERVIEW

The EHR Incentive Program provides incentive payments to eligible professionals (EPs) and eligible hospitals for adopting and meaningfully using certified EHR technology

Understanding that EHR technology is often adopted and maintained at the group practice or clinic level, CMS is allowing EPs to voluntarily “reassign” their year’s incentive payments to other entities they have a business relationship with.

CMS allows EPs participating in the Medicaid EHR Incentive Program to reassign incentive payments:

To entities with which they have a contractual arrangement allowing the entity to bill and receive payment for the EP’s covered professional services. The EP must have a business relationship in ProviderOne that was in place at the time of attestation.

**Please see the paper on: [Business relationship required for payment reassignment](#)

VOLUNTARY REASSIGNMENT

CMS is clear: “*Any reassignment of payment must be voluntary.*” For a payment reassignment to be voluntary, an EP must be informed of and consent to the reassignment. A reassignment cannot be considered voluntary if the EP did not know about it, and/or did not agree to it. Keep any verification of consent on file in case of audit or challenge.

*We have made a temporary policy, for program year 2017, to allow Groups to attest for Providers for the 2017 payment year if they are no longer employed by the group as of 10/3/17, and if MU information was collected on this EP during a reporting period in 2017. The group must communicate with the new employer and EP and have a signed agreement for the your group to receive the EPs payment. You must keep the signed EP agreement on-file and upload it into the eMIPP attestation.

This is allowed for 2017 attestations only, due to the late deployment of eMIPP for the 2017 payment year.

Please use the **2017 Temporary Re-assignment Agreement** posted in the Tools and tip sheets section.



COMPLIANCE

Pertaining to payment reassignment, Washington State considers the principle of voluntary reassignment to be primary and critical. Payments that are found to have been reassigned without consent of the EP will be recouped.

During the Washington State EHR application process, EPs (or their designee) must attest to the voluntariness of both participation and any reassignment of payment. Group practices and clinics, to which EPs reassign payments, are strongly advised to solicit and retain written and signed consent from their participating EPs. Such records will be valuable in the event of an audit and/or any possible future disputes over these issues.

TAX ISSUES

The State makes no pronouncements regarding the tax implications of EHR incentive payments. EPs and group practices are advised to consult with a tax professional. Tax liability will follow the tax ID listed in ProviderOne listed for the Payee NPI.

FURTHER INFORMATION

If there are any further questions regarding incentive payment reassignment or other issues concerning the EHR Incentive Program in Washington State, please contact HealthIT@hca.wa.gov.