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→ **Note:** This newsletter has several links within it. You may need to hold down "Ctrl" when placing your cursor over the link and click.

## ATTENTION ELIGIBLE PROFESSIONALS

**The deadline for 2014 EHR Incentive Program Attestations is MARCH 31, 2015 at 11:59 PM. This means you must submit your attestation by this time and date for Program Year 2014 or we will reject your submission as untimely. Keep in mind, your patient encounter volume comes from a consecutive 90-day period in 2013, and your MU data comes from a consecutive 90-day period in 2014. These are two totally different time periods.**

▶▶ **Attesting for 2015:** CMS has previously announced that they will promulgate a rule that will change the MU attestation period from 365 days to 90 days for 2015. However, we don't expect the rule to be final and effective until sometime this summer. *TennCare will **NOT** accept 2015 attestations for a 90-day MU attestation period until the CMS rule is in effect.* This will give you additional time to get your 2014 Edition CEHRT up and running. As soon as the rule is finalized, both CMS and TennCare will inform you. If we hear any additional information, we'll pass it along as it becomes available.

## IMPORTANT CHANGE – REQUIRED FORMS

Previously we had said that you could use the same W9 and ACH Form throughout the EHR Incentive Program, unless something changed in that information. Well, something has changed. Both the IRS and the State Department of Finance & Administration have notified us that a change needs to be made.

We reported once before that the IRS no longer is accepting the Substitute W9. They want what we call the "real" W9. The link under Required Forms for the W9 will take you to the IRS web site so that you can always get the most up-to-date form. This must be submitted annually.

The Department of Finance & Administration has informed us that both the W9 and the ACH must be signed and dated **no more than 3 months prior to your attestation being submitted.** We are having to return attestations

because these forms are out-of-date according to F&A guidelines. **ALL** Required Forms must be submitted annually with current dates, including the Signature Page. Some providers have used an old Signature Page and changed the dates. There is a new Signature Page available through the Required Forms link.

## EP & EH HARDSHIP EXCEPTIONS

Eligible Professionals and Eligible Hospitals may be exempt from the Medi**CARE** payment adjustments if they can show that demonstrating meaningful use (MU) would result in a significant hardship. To be considered for an exception, an EP or EH must complete a Hardship Exception application along with proof of the hardship. The application can be found on the CMS EHR [web site](#).

### EP Hardship Exception Application

- 2015 EP Hardship application deadline was July 1, 2014
- **2016** EP Hardship application will be available soon (per CMS web site)

### EH Hardship Exception Application

- 2015 EH Hardship application deadline was April 1, 2014
- **2016** EH Hardship application will be available soon (per CMS web site)

**Important**, the Hardship Exception application process relates to Medi**CARE** and is handled by CMS. The TennCare Medicaid EHR Incentive Program is NOT involved in this process. You should always go to the CMS EHR web site for the latest information.

## *Another Reason Why Electronic Health Records Are Important*

Let's face it – both EPs and EHs have wondered from time-to-time, whether the switch to EHR is worth the effort or not. Sure there are the EHR Incentive Payments for doing so, and the Medicare payment reductions for Medicare EPs/EHs who don't, but are we reaching the goals set out at the beginning of the program? These were/are

- ❖ Improve Quality, Safety, Efficiency, and Reduce Health Disparities
- ❖ Engage Patients and Families in their Healthcare
- ❖ Improve Care Coordination
- ❖ Improve Population and Public Health
- ❖ Maintain Privacy and Security

The truth of the matter is “YES” we are making improvements in all of these areas. Perhaps not as fast as any of us would like, but we are seeing changes in the health care landscape of Tennessee and the U.S. But, did you know that there is another reason for using EHR?

A recent article by Jennifer Bresnick, “Warehouse Fire Highlights Importance of Electronic Health Records<sup>1</sup>,” emphasizes the security and importance of backup documentation by using your EHR. Ms. Bresnick’s article relates that “Several New York hospitals dodged a major blow when a Brooklyn warehouse went up in smoke this weekend thanks to keeping duplicate copies of their documents in the electronic health records (EHR) systems.” In addition to patient records, these hospitals also stored legal and financial documents in the warehouse. By having patient data stored in the hospitals’ EHR systems they avoided a total loss of this information as a result of the fire. While security breaches are more common, catastrophic events such as fires, tornadoes, and floods reinforce the need for backup data on your patients, and EHR systems are a good way of accomplishing that. You can view Ms. Bresnick’s article by clicking [here](#).

## Security Risk Analysis

The HITECH Act puts an emphasis on providers (EPs & EHRs) doing an annual security risk analysis (SRA) of their CEHRT and office in general. This is also an important part of HIPPA. The fact that you have an up-to-date CEHRT does not mean that your system is secure from hacker attacks. These previous TennCare EHR Newsletters, [September 10, 2014](#) & [January 21, 2015](#), provided you with important information about the need for correctly executed SRAs.

The recent hacking of the Anthem system (of which the TennCare MCO Amerigroup is a part) demonstrates even more your need to assure the protection of your patients’ information. ABC News recently posted an article – “Is your Doctor’s Office the Most Dangerous Place for Data?” You can read this article by clicking [here](#).



### Attention Eligible Hospitals



*This announcement was made by CMS on February 11, 2015. For more information go to the CMS web site.*

## Hospitals Must Start Medicare EHR Participation in 2015 to Earn Incentives

Not participating in the **Medicare** EHR Incentive Program yet? 2015 is the **last year** for eligible hospitals to begin and still earn incentive payments.

To earn a 2015 incentive payment and avoid a 2016 payment adjustment, first-time participants should:

<sup>1</sup> EHR Intelligence; February 3, 2015

- Begin their 90-day reporting period no later than **April 1, 2015**
- Attest by **July 1, 2015**

Eligible hospitals that miss this deadline can still earn a 2015 incentive payment—and avoid the 2017 payment adjustment—if they begin their reporting period by July 1 and attest by November 30. However, they will be **subject to the 2016 payment adjustment** unless they apply and qualify for a [hardship exception](#).

Hospitals that successfully attest in 2015 will also be eligible to earn a 2016 incentive if they continue to participate.

Eligible hospitals that begin participating after 2015 will **not** be able to earn incentive payments. They will also be subject to payment adjustments in 2016 and 2017.



## You **MUST** Report Changes

As you know, the TennCare EHR Provider Incentive Program is an electronic, online program. You register with CMS and TennCare online, you attest online, we communicate through email messages, and your EHR Incentive Payment is made electronically to your bank. The **EXCEPTION** is the 1099s we are required to mail you each year. These we must send via the U.S. Post Office.

At the end of January, we mailed the required 1099s for EHR Incentive payments made in 2014. A number of those 1099s were returned to us as undeliverable. For the ones we could locate, we obtained a new address, and passed it on to the Department of Finance & Administration, in order that the 1099s could be re-mailed. **HOWEVER**, we are unable to update these new addresses in the PIPP portal. Providers **must** update an address change by returning to the CMS Registration & Attestation System web site and modifying the registration information.

You must follow these instructions.

- Go to the CMS Registration & Attestation System [web site](#)  
(or enter into your browser <https://ehrincentives.cms.gov/hitech/login.action>)
- Enter the CMS Registration Number you were originally given
- Click on “Modify”
- **On EACH page, click “Save & Continue”**
- **On the appropriate page(s), make the needed change(s), click “Save & Continue”**
- On the last page, click “Submit”

This will save your information and cause CMS to re-send your information back to us for processing within 24 – 48 hours. If you fail to click ‘Save & Continue’ on EACH page, and then ‘Submit’, we will not receive your information and an error will be generated. Even if all you do is open your registration, but make no changes, you must still follow the instructions above.

It is vitally important that anytime any of your information changes – whether address, phone number, or email address – that you go to the CMS Registration & Attestation System web site and update your information on file.

You must also go to the TennCare Provider Registration [web site](#) and make the appropriate updates to your provider profile. Provider Registration and the EHR Incentive Program are separate and changes to one doesn't crossover to the other (see <http://www.tn.gov/tenncare/pro-forms.shtml>). If you need assistance, contact Provider Registration by emailing [Provider.Registration@tn.gov](mailto:Provider.Registration@tn.gov).

Remember, it is your responsibility to report changes to the Bureau of TennCare. Reported changes to the MCCs do not always reach the EHR Incentive Program.



## Contact Information

As always, anytime you have a question or need assistance, please feel free to contact us. We will get back to you as quickly as possible.

**↳ Please be sure to include the provider's name and NPI when contacting us. ↩**

- ◆ For questions relating to **Meaningful Use (MU)**, send an email to [EHRMeaningfuluse.TennCare@tn.gov](mailto:EHRMeaningfuluse.TennCare@tn.gov)
- ◆ For **all other questions**, send an email to [TennCare.EHRIncentive@tn.gov](mailto:TennCare.EHRIncentive@tn.gov)
- ◆ The **CMS Help Desk** can be reached at 1-888-734-6433.
- ◆ **TennCare Medicaid EHR Incentive Program web site:** [http://www.tn.gov/tenncare/ehr\\_intro.shtml](http://www.tn.gov/tenncare/ehr_intro.shtml)
- ◆ **PowerPoint Presentations** on different subject areas are available here:  
[http://www.tn.gov/tenncare/ehr\\_page6.shtml](http://www.tn.gov/tenncare/ehr_page6.shtml)

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