MARYLAND
Department of Health

eConnect
EHR Incentive Program Newsletter

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eMIPP

Maryland Medicaid has locked eMIPP as we update the system to align with federal requirements. Providers are welcome to initiate their registration for the Maryland Medicaid Electronic Health Record (EHR) Incentive Program on the [Centers for Medicare and Medicaid (CMS) Registration and Attestation site](). However, providers will not be able to access eMIPP to complete their attestation for Program Year 2018 until the system is unlocked.

Maryland Medicaid expects to send out an email notification when eMIPP opens.

eMIPP Password Reset Feature

The login credentials for eMIPP are the same as eMedicaid. If you have trouble logging in to eMIPP, please click on the "Forgot Your Password?" link on the [eMIPP]() homepage to reset your password. It will direct you to the eMedicaid password reset page.

If you are not able to reset your password using eMedicaid, please call Provider Relations at 410-767-5503 (option #4).

Modified Stage 2 vs. Stage 3 - Which one should you attest to for Program Year 2018?

Your Certified EHR Technology (CEHRT) edition will determine the stage to which you attest for Program Year 2018.

- All new and returning participants attesting to the Medicaid EHR Incentive Program have the option to attest to the Modified Stage 2 objectives and measures using 2014 Edition CEHRT, 2015 Edition CEHRT, or a combination of 2014 and 2015 Edition CEHRT, as long as their EHR technology supports the objectives and measures to which they plan to attest.

- All new and returning participants attesting to the Medicaid EHR Incentive Program have the option to attest to the Stage 3 objectives and measures with 2015 Edition CEHRT, or a combination of 2014 and 2015 Edition CEHRT as long as their EHR technology supports the functionalities, objectives and measures for Stage 3.

Modified Stage 2 and Stage 3 Specification Sheets:

- View the Modified Stage 2 Specification Sheet for EPs and Dual-Eligible Hospitals
- View the Stage 3 Specification Sheets for EPs and Dual-Eligible Hospitals.

Reminders for Providers

Meaningful Use (MU) Reporting Period

The EHR reporting period must occur between **January 1, 2018 and December 31, 2018**.

Please note that the MU reporting period for Program Year 2018 is any continuous 90-day period for **all** participants.

Supporting Documentation

Maryland Medicaid must review supporting documentation **before** approving EHR Incentive Program attestations. Before submitting your attestation, please upload the following documents in the "Upload Documents" tab in eMIPP:
- The report from your EHR showing the numerators and denominators for each reported MU measure and CQM for your selected reporting period.
- The Security Risk Assessment (SRA) your organization conducted for Program Year 2018. The following parameters must have been met to satisfy this requirement:

  - The SRA should have been **completed and dated within Program Year 2018.** For example, for Program Year 2018, the SRA must have been completed between January 1, 2018 and December 31, 2018.
  - The SRA should address threats/vulnerabilities to electronic Protected Health Information (e-PHI).
  - The SRA should assign **likelihood ratings, impact ratings and risk levels** for each threat.
  - For each threat identified as a medium or high risk, the SRA should include a **remediation strategy** to minimize those risks.
  - The SRA should address the **encryption** requirement for e-PHI.
  - The SRA should identify **administrative, physical, and technical safeguards**.
  - The SRA should be specific to **your** practice.
  - The SRA should include an **Asset Inventory**. For each asset (such as server, computer, etc.) the practice should have identified the type, location, responsible person, and whether it contains PHI
  - For more guidance, please visit HealthIT.gov.

  Please note, a Yes/No checklist or simply stating that your PHI is stored on a cloud-based system does not satisfy the SRA requirement.

- Screenshots that show five clinical decision support (CDS)
- Screenshots that show drug-drug and drug-allergy check functionality settings and example of alerts from your EHR system.

The Maryland EHR Incentive Program Team is offering to assist providers in advance of opening eMIPP by reviewing patient volume and Meaningful Use objectives. Please submit questions or requests for patient volume or Meaningful Use review to the EHR Incentive Program Team via email at mdh.marylandehr@maryland.gov IMPORTANT: Please use email encryption or password-protection when sending sensitive documents, especially those that include protected health information (PHI).

EHs and CAHs should email mdh.marylandehr@maryland.gov for information about the supporting documentation required for attestation approval.

Post-Payment Auditing: Myers and Stauffer, LC

The Maryland Department of Health (MDH) contracted with Myers and Stauffer, LC (MSLC) to conduct post-payment audits of providers participating in the Medicaid EHR Incentive Program through desk reviews or on-site examinations. MSLC has worked with several states performing post-payment audits and has been involved in the EHR program since it was launched nationally.

The Centers for Medicare & Medicaid Services (CMS) requires the State Medicaid Agency to conduct Adopt, Implement, or Upgrade (AIU) and Meaningful Use (MU) audits of certified Electronic Health Record (EHR) technology as stated in Section 13411 of the Health Information Technology for Economic and Clinical Health Act (HITECH Act), as included in Title XIII, Division A, Health Information Technology and in Title IV of Division B, Medicare and Medicaid Health Information Technology of the American Recovery and Reinvestment Act of 2009. The HITECH Act provides Medicaid the right to audit and inspect any records of any person or organization receiving an incentive payment.

By participating in the Maryland Medicaid EHR Incentive Program, EPs, EHs and CAHs agree to adhere to any post-payment audit for up to **six years** post-attestation. For this reason it is imperative that providers retain documentation that supports attestation data for patient volume, MU objectives and CQM's for six years. In order to easily facilitate a post-payment audit, MDH recommends that providers upload all of their supporting documentation to eMIPP, as well as maintain hard or electronic copies for themselves.

NOTE: A provider who switches EHR vendors or who discontinues practicing is still required to provide supporting documentation for the year to which they attested. Failure to do so will only result in a negative outcome.

For an Attestation Checklist.
For the eMIPP User Guide.

If you have questions or concerns, please contact our Meaningful Use Support team at CRISP at support@crisphealth.org or call 877-952-7477.

To view more information about the requirements for Program Year 2018, please visit the CMS Meaningful Use website