

QPP: 2018 KY Medicaid EHR Incentive Program vs. MIPS Promoting Interoperability Performance Category

The KY Medicaid EHR Incentive Program (IP) is a voluntary program with no penalties assessed if providers do not participate. Under the Merit-Based Incentive Payment System (MIPS), providers submit data in the Promoting Interoperability (PI) category in order to improve their overall MIPS score.

	KY Medicaid EHR Incentive Program	Promoting Interoperability Performance for MIPS
Scoring:	Pass or Fail	Scored based on performance
Incentive:	Six years of incentives are paid out in the KY Medicaid EHR IP. 2016 was the final year of entry, with 2021 being the final year of incentives.	Participation increases ECs overall MIPS Final Score which impacts their adjustment factor. This category makes up 25% of the final MIPS score.
Reporting Timeframe:	Each require a minimum of any continuous 90 days of reporting during the program year	
Attestation Level:	Reporting is done at the individual level only	Reporting can be done at the group or individual level
Objectives:	Modified Stage 2 which align with MIPS PI Transitional Measures	Transitional Measures align with the KY Medicaid EHR Incentive Program
Measures:	Requires all Modified Stage 2 measures be reported on	Requires reporting on HIE, Access, eRx and SRA. Additional measures can be reported for additional points
Eligibility:	Eligible Provider under KY Medicaid EHR IP: 30% Medicaid patient volume; 20% Medicaid patient volume for pediatricians	Eligible Clinician under MIPS: \geq \$90,000 in Medicare Part B charges and \geq 200 Medicare patients
Reporting Timeline:	Each require data to be submitted by March 31, 2019	

Dual-Eligible Clinicians

If clinicians who are eligible for the KY Medicaid EHR Incentive Program are also Medicare Part B clinicians, they may participate in both the KY Medicaid EHR Incentive Program and MIPS.

Submission Methods

KY Medicaid EHR Incentive Program is submitted through Attestation
MIPS is submitted through Qualified Registry, EHR, QCDR, CMS Web Interface or Attestation

History

The U.S. government introduced the Meaningful Use program as part of the 2009 Health Information Technology for Economic and Clinical Health (HITECH) Act, to encourage health care providers to show “meaningful use” of a certified Electronic Health Record (EHR). In 2015, the Medicare Access and CHIP Reauthorization Act (MACRA) was introduced, which combined existing quality programs into one new system, the Merit-Based Incentive Payment System (MIPS). The Medicare Meaningful Use program sunset into the Promoting Interoperability Performance Category within MIPS.

The Medicaid Meaningful Use program remains in effect until the year 2021, when incentive payments will no longer be available for providers. The program was renamed to the KY Medicaid EHR Incentive Program (Promoting Interoperability) in May 2018.

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