

KY REC Tip for the Kentucky Medicaid EHR Incentive Program (Promoting Interoperability)

Overview of Program Year 2021



Program Year 2021 is the ***last*** participation year of the Medicaid Promoting Interoperability Program for EPs

Requirements for Eligible Professionals in 2021

- All providers will be required to use an EHR and CQM reporting period of 90 continuous days
- All providers must use 2015 certified EHR technology (CEHRT) during the entire reporting period
- CQMs may be reported using QRDA-III file in XML format, or manual entry



Deadline

• **Attestation Deadline - August 31, 2021**

Protect Patient Health Information in 2021

As a previously established requirement of the program, EPs must conduct or review a security risk analysis (SRA) in the same calendar year as the EHR reporting period. Historically, the SRA had to be completed prior to attestation. However, regulation requires all incentive payments for Program Year 2021 must be issued by December 31, 2021. To help facilitate this, the attestation deadline is set for August 31, 2021.

Recognizing that some EPs may not have conducted their SRA before the attestation deadline, CMS has made the following allowances:

- EPs may conduct an SRA at any time during calendar year 2021, even if it is conducted after the EP attests to meaningful use of CEHRT.
- If the EP has not conducted an SRA at the time of attestation, the EP will be required to attest that he or she will complete the required SRA by December 31, 2021.
- If an EP fails to conduct an SRA during calendar year 2021, the EP may have their incentive payment recouped.

Overview of 2021 Objectives and Measures

- There are no changes to objectives or thresholds reported for 2021

Objective	Measure
Protect Patient Health Information	Security Risk Analysis
Electronic Prescribing	>60% ePrescribing
Clinical Decision Support	5 CDS Rules related to 4 CQMs Drug-Drug and Drug-Allergy Interaction Checks
Computerized Provider Order Entry (CPOE)	>60% Medication Orders >60% Lab Orders >60% Diagnostic Imaging Orders
Patient Electronic Access	>80% Patient Access >35% Patient-Specific Education
Coordination of Care Through Patient Engagement <i>(Attest to all 3 measures / Meet threshold for 2)</i>	>5% View, Download and Transmit (VDT) >5% Secure Messaging >5% Patient-Generated Health Data (PGHD)
Health Information Exchange <i>(Attest to all 3 measures / Meet threshold for 2)</i>	>50% Exchange Information with Other Physicians >40% Exchanged Information Incorporated >80% Clinical Information Reconciliation
Public Health and Clinical Data Registry Reporting <i>(Attest to 2 measures)</i>	Immunization Registry Reporting Syndromic Surveillance Reporting Electronic Case Reporting Public Health Registry Reporting Clinical Data Registry Reporting

Important Reminders:

- Start working towards capturing a valid 90 day reporting period as soon as possible beginning January 2021.
- Inform staff of the August 31, 2021, deadline and the importance of meeting objectives earlier in the year.
- Plan on ending your 90 day reporting period prior to August 1, 2021 to leave ample time for attestation and issue resolution.
- Work with your vendor to ensure you will have reports available for Program Year 2021 as soon as possible, but no later than April 1, 2021.
- Plan your Security Risk Analysis for 2021. If it is not performed prior to attestation, ensure it is completed before the end of the calendar year.
- Generate your 90-day Patient Volume Report as soon as possible.
- Retain all suggested documentation for audit purposes. Although the program is ending, you may still be subject to an audit for up to six years after the program year you attested.