

FAQ's for Achieving Meaningful Use for Stage 1 of the ARRA EHR Incentive Program for 2011 and 2012

What is the definition of an Eligible Provider/Professional as defined by CMS, for Participating Providers to qualify for the EHR incentive payments?

An Eligible Provider/Professional(EP) is non-hospital based, has at least 50% of all patient encounters in a location using a certified EHR, and is a doctor of medicine or osteopathy, a doctor of dental surgery or dental medicine, a doctor of podiatric medicine, a doctor of optometry, or a chiropractor, who is legally authorized to practice under state law.

What is the earliest date an EP can qualify to receive ARRA incentive payments?

Eligible Providers who have been consistently using an EMR since January 1, 2011 can attest in April 2011 for Medicare. Medicaid providers were eligible to begin receiving payments in 2010 for adopting, implementing and upgrading.

What is the maximum amount of total incentive payments that an EP can receive under the ARRA EHR incentive program?

\$44,000.00 for Medicare
\$63,750 for Medicaid

What is the last year an EP can begin receiving EHR incentive payments for achieving Meaningful Use?

2014 for Medicare
2021 for Medicaid

If an EP predominantly furnishes services in a geographic Health Provider Shortage Area, are additional incentives available from Medicare?

Yes. An additional 10% is available, to a maximum of an additional \$4,400.00 for Medicare, \$6,375 for Medicaid.

What is the last year to receive incentive payments from ARRA?

2016 for Medicare, regardless of the year in which the EP became a Meaningful User
2021 for Medicaid.

What is the last year to receive incentive payments from ARRA?

2016 for Medicare, regardless of the year in which the EP became a Meaningful User
2021 for Medicaid.

What is the last year to begin participation in the ARRA EHR Incentive Program?

2014 for Medicare
2016 for Medicaid

If an EP predominantly furnishes all of their services in an inpatient or emergency department setting (90% or more), are they eligible for incentive payments?

No

Is an EP, who is collecting ARRA EHR Incentives, allowed to simultaneously participate in and collect payments from the e-Prescribing (eRx) Incentives Program?

No. Once an EP attests to MU, he is then ineligible for the eRx incentive for that year.

Can an EP participate in the ARRA EHR Incentive program while participating in the Physician Quality Reporting Initiative (PQRI) Incentive Program?

Yes

Is a CCHIT Certified EHR required to demonstrate meaningful use and participate in the ARRA EHR Incentive Program?

Yes

When will EP's face Medicare penalties for failing to achieve meaningful use?

2015

How will the penalties be applied to an EP?

In the form of reductions to the Medicare reimbursement, as follows:

2015: 99% of fee schedule; or 98% of fee schedule if EP failed to comply with eRx mandate by this date

2016: 98% of fee schedule

2017: 97% of fee schedule

There is no fee reduction for Medicaid.

How does ARRA determine the maximum payment amount to an EP?

Medicare: 75% of Part B claims (Requires \$24K annual Part B charges to get \$18K maximum 1st year incentive)

Medicaid: AIU (Adopt, Implement, Upgrade) year one incentive payment is based on 15% of cost to implement EHR. EP other than Pediatricians must have a patient volume of 30% Medicaid to qualify; Pediatricians are eligible with 20% of their patient volume but will receive 2/3 of the incentive until a threshold of 30% patient volume is met. Incentive payment is based on encounters.

Are the rules, definitions, criteria and payments different between Medicare and Medicaid for an EP?

Yes. States can adopt additional requirements for Meaningful Use. Michigan has yet to publish additional requirements.

Sources:

<http://www.hhs.gov/news/press/2009pres/12/20091230a.html>

<http://federalregister.gov/inspection.aspx>

Federal Register Public Inspection Desk, "Medicare and Medicaid Programs; Electronic Health Record Incentive Program," pages 272-282, available at, <http://www.ofr.gov/OFRUpload/OFRData?2010-17207>

(The information contained in this FAQ document was obtained from the sources above as of 8/13/10)