

NOVEMBER
2020



Incentive News

TENNCARE EHR PROVIDER INCENTIVE PAYMENT PROGRAM
A CMS "Promoting Interoperability" Program

Reminders:

Information which will assist you —and the latest updates — is available on the [TennCare EHR Incentive website](#).

Are You Still Eligible to Attest?

A provider must have successfully attested for and received one EHR incentive payment by Program Year 2016 in order to remain eligible for the PIPP program. There is also a cap of six payments for available to eligible professionals.

Providers uncertain about their eligibility should send an inquiry to TennCare.EHRIncentive@tn.gov.

Please include your name and NPI.

Are You Ready? PIPP Opens Nov. 1 for Program Year 2020 Attestations

Attesting for Program Year (PY) 2020 of the TennCare EHR Provider Incentive Payment Program (PIPP) is almost here!

Providers **may** submit PY 2020 attestations when PIPP software opens November 1 **IF they are ready**. "Ready" is defined as having completed the 2020 Security Risk Assessment (SRA) and the 90-day Meaningful Use (MU) period **prior** to submitting an attestation.



We have several helps available to you for PY 2020. In this issue, look for assistance in preparing a Risk Assessment on page 4 and a guide to PY 2020 MU objectives and measures on page 3. From the [TennCare EHR Incentive website](#) you can download the [2020 Pre-Attestation Checklist](#) to give you a jumpstart or make sure you are ready to go. If you need to refresh your memory on how to attest, or if you are new to an eligible provider's office and have been tasked with attesting for them, you'll find our [PowerPoint Presentations](#) helpful. And be sure to look for the "Help/User Manual" link found on the left side of each PIPP portal page.

PY 2020

PIPP opens Nov. 1, 2020.

Submission **deadline: March 31, 2021, 11:59 p.m. CT.**

MU and eCQM reporting period in 2020 for EPs in the Medicaid Promoting Interoperability Program is a minimum of any continuous 90-day period within CY 2020.

PY 2021

PIPP opens **July 1, 2021.**

The MU reporting period must end by **July 31, 2021.**

Submission **deadline: Sept. 30, 2021, 11:59 p.m. CT.**

*MU and eCQM reporting period is a minimum of any continuous 90-day period within CY 2021, **provided that the end date for this period falls before July 31, 2021.***

Preparing and Submitting Your Program Year 2020 TennCare EHR Incentive Attestation

TennCare is able to open its PIPP software November 1 this year as CMS has changed the length of the time period for MU data collection. While CMS still prefers 365 days' worth of data, for PY 2020 providers have the option of submitting data from a consecutive 90-day period when attesting.

Choose your period now, and it's possible you could attest before year's end.

For instance, you might decide to start your 2020 MU period on August 10. A 90-day period would then end on November 8, and you'd be able to attest in that same month.

The deadline for submitting PY 2020 attestations will be March 31, 2021, but why wait? The sooner you complete your 2020 attestation, the sooner you'll be able to begin your PY 2021 attestation. That's important because you will be required to submit 2021 attestations by September 30, 2021, as the TennCare EHR Provider Incentive Payment Program ends that year.

All EPs attesting for PY 2020 will be required to attest to MU Stage 3 and demonstrate use of a 2015 edition of certified EHR technology (CEHRT). EPs may use any continuous 90-day period from calendar year 2020 for which MU can be successfully demonstrated.

In addition you can access details regarding PY 2020 objectives and measures via the table on page 3 of

this issue, and PY 2020 eCQMs are available for review on the [eCQI website](#).

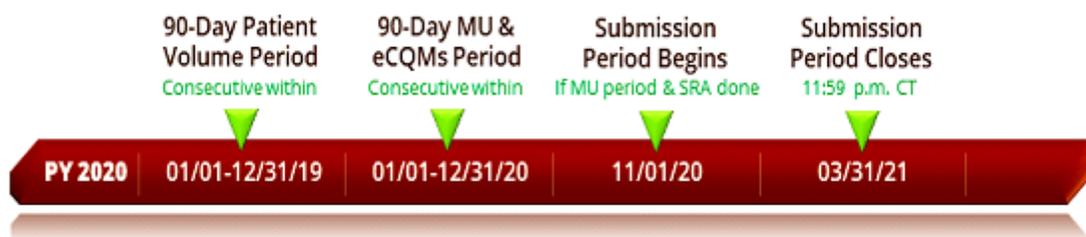
What you need to know:

- Patient Volume will come from a 90-day period in **2019**.
- MU and eCQM data will come from a 90-day period in **2020**. CMS encourages eCQM data for the full year but will accept 90-days for PY 2020.
- Before you submit your 2020 attestation, you **must have completed** your 2020 Security Risk Assessment (SRA) **prior** to submission. See page 4 of this issue for links to help you prepare your 2020 SRA.

NOTE: The resubmission period for returned 2020 attestations will be tighter than in years past. This is because the attestation period for PY 2021 will begin July 1, 2021. You will not be able to attest for PY 2021 until your PY 2020 attestation has been approved or denied, therefore all PY 2020 attestations that are submitted timely by March 31, 2021 must have any requested corrections resolved by June 30, 2021.

If you have any questions, please do not hesitate to immediately send them to TennCare.EHRIncentive@tn.gov. And remember, **ALWAYS include the provider name and NPI** in the body of the message when sending email.

Program Year 2020 Timeline



Guide to PY 2020 Objectives and Measures

Click an objective title to open a page of information and details on the CMS website.

Objective	Description
<u>Protect Patient Health Information</u>	Protect electronic protected health information (ePHI) created or maintained by the certified electronic health record technology (CEHRT) through the implementation of appropriate technical, administrative, and physical safeguards.
<u>Electronic Prescribing</u>	Generate and transmit permissible prescriptions electronically.
<u>Clinical Decision Support</u>	Implement clinical decision support (CDS) interventions focused on improving performance on high-priority health conditions.
<u>Computerized Provider Order Entry</u>	Use computerized provider order entry (CPOE) for medication, laboratory, and diagnostic imaging orders directly entered by any licensed healthcare professional, credentialed medical assistant, or a medical staff member credentialed to and performing the equivalent duties of a credentialed medical assistant, who can enter orders into the medical record per state, local, and professional guidelines.
<u>Patient Electronic Access to Health Information</u>	The eligible professional (EP) provides patients (or patient-authorized representative) with timely electronic access to their health information and patient-specific education.
<u>Coordination of Care Through Patient Engagement</u>	Use CEHRT to engage with patients or their authorized representatives about the patient's care.
<u>Health Information Exchange</u>	The EP provides a summary of care record when transitioning or referring their patient to another setting of care, receives or retrieves a summary of care record upon the receipt of a transition or referral or upon the first patient encounter with a new patient, and incorporates summary of care information from other providers into their EHR using the functions of CEHRT.
<u>Public Health and Clinical Data Registry Reporting</u>	The EP is in active engagement with a public health agency (PHA) or clinical data registry (CDR) to submit electronic public health data in a meaningful way using CEHRT, except where prohibited, and in accordance with applicable law and practice.



Do You Have Questions About

The EHR Incentive Program?

Meaningful Use Measures?

Electronic Clinical Quality Measures?

Your attestation?

Email [TennCare.
EHRIncentive
@tn.gov](mailto:TennCare.EHRIncentive@tn.gov)

**Always include
the Provider's
Name and NPI
when
communicating
with TennCare.**

Completing Your 2020 Security Risk Assessment Soon May Lead to an Earlier Incentive Payment

Providers wanting to submit their 2020 EHR Incentive attestation as soon as November may receive their next EHR Incentive payment earlier than usual — provided their 2020 Security Risk Assessment (SRA) is complete.

TennCare providers who remain eligible to participate in the Provider Incentive Payment Program (PIPP) have the unusual opportunity this Fall to attest during the same calendar year as the attestation period. This is due to a CMS change for Program Year (PY) 2020 allowing providers to attest with as few as 90 days of Meaningful Use and Clinical Quality Measure data, and to the opening of our PIPP attestation software in November.

But before you submit, CMS is requiring that your SRA be completed. You cannot submit your PY 2020 attestation until you have completed the SRA. If you have not or cannot complete your SRA until the end of Calendar Year 2020, *then you must wait to submit your attestation* until after January 1 (but no later than March 31, 2021).



In order to qualify for an EHR incentive payment, a provider must meet the SRA requirements outlined in the Security Standards of **45 CFR 164.306 – 316**. The following guidance will assist you in performing your annual risk assessment:

[Security Rule Guidance Material](#)

Source: Office for Civil Rights

[Security Risk Assessment Tool and Video](#)

Source: Office of the National Coordinator for Health IT

[Security Standards for the Protection of Electronic Protected Health Information](#)

Source: Code of Federal Regulations

Title 45: Public Welfare

Part 164 – Security and Privacy

Subpart C – 164.302 – 164.318 & Appendix

Looking Ahead: Here's What You Need to Know about Attesting for Program Year 2021

As 2021, the final Program Year (PY) of the TennCare EHR Incentive Program, is on the horizon, here's what you need to know to plan for a foundation toward successful attestation.

The final year will be for providers who still have yet to receive six EHR Incentive Payments and are still eligible to attest. To be eligible a provider must have received at least one EHR Incentive Payment for any year through Program Year (PY) 2016.

The submission period for PY 2021 begins July 1, 2021. CMS will allow you to attest prior to completing your annual SRA, but you must attest that you will complete and submit your SRA by Dec. 31, 2021.

The deadline for submissions is Sept. 30, 2021, 11:59 P.M., Central Time.

If you attested for PY 2020, that attestation must be adjudicated before you can complete your PY 2021 attestation. That means we must review and either pass or deny your PY 2020 attestation prior to you completing your PY 2021 attestation. In fact, you will not be able to access your PY 2021 attestation until either payment is made or the attestation is denied.

Patient Volume will come from a consecutive 90-day period in CY 2020.

Meaningful Use (MU) data, including eCQMs, will

come from a **consecutive 90-day period in CY 2021.** You may choose **any 90 days starting with Jan. 1, 2021 through July 31, 2021.**

If you have not completed your annual SRA by the time you attest, you **must complete** your SRA by Dec. 31, 2021. You **are required** to attest that you will complete the SRA by this date. States have the flexibility to require documentation that the SRA has been completed if conducted after the submission of the 2021 attestation.

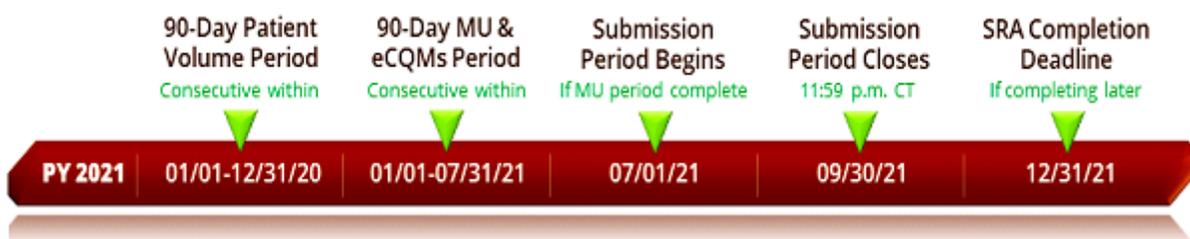
We cannot emphasize enough that you understand the dates for attesting for PY 2021. You **must attest** in CY 2021. You **cannot attest** until your PY 2020 has been adjudicated, assuming you attested for PY 2020. The MU data collection period **begins Jan. 1, 2021 and ends July 31, 2021.** If you choose to use May-June-July as your MU data collection period, you **MUST** still submit your attestation by Sept. 30, 2021. If your **SRA** is not conducted pre-attestation, you **must attest** that one will be completed by Dec. 31, 2021, and then you must do so. Failure to conduct the SRA will result in a finding if you are audited.

Should you have any questions:

Visit our web site at <https://www.tn.gov/tenncare/tenncare-medicaid-electronic-health-record-ehr-provider-incentive-payment-program.html>.

Email us at TennCare.EHRIncentive@tn.gov.

Program Year 2021 Timeline





Division of
TennCare

EHR Incentive News **NOVEMBER 2020**

Medicaid EPs and EHRs should submit questions about the Medicaid Promoting Interoperability (PI) Program (in Tennessee also known as the TennCare EHR Provider Incentive Payment Program) to TennCare.EHRIncentive@tn.gov; including questions about

- Eligibility (first 4 attestation pages)
- Meaningful Use
- Clinical Quality Measures
- Program Participation

ALWAYS include the provider's name and NPI when contacting us. We will respond to your inquiry as quickly as possible.

Should you have issues with a CMS website, contact the QualityNet help desk for assistance at qnetsupport@hcqis.org or 1-866-288-8912.

View TennCare Medicaid EHR Incentive Program online assistance at

- [Program website](#)
- How-to [PowerPoint Presentations](#)
- [FAQs](#)
- [Acronyms & Glossary](#)
- [Previous issues](#) of EHR Incentive News

TennCare E-Newsletters: If you choose to unsubscribe from this list at any time, you may do so by sending a message to: listserv@listserv.tn.gov, (no subject) and unsubscribe MedicaidHIT. You will receive an email confirming your removal.

Changed Your Practice Location(s) Recently?

Maybe your office changed this summer, or maybe you found yourself in a strange new place because of changes related to the COVID-19 pandemic. But whatever the reason for the change, make sure TennCare has information on each location where you practice.

Before the 2020 attestation period begins, take advantage of this time to update your practice location(s) in the following systems:

1. CMS EHR Registration and Attestation website
2. CAQH ProView
3. TennCare Provider Registration Portal
4. NPPES NPI Registry

We stress having the correct, up-to-date, and **EXACT** address for all locations because we now check the practice addresses listed on your

attestation against the addresses in these system profiles. If there is not an **EXACT** match, we return your attestation.

Not sure of your correct address(es)? Check with your local post office or mail carrier, as they can provide your correct address. If your address is a post office box, ask for the physical address.

Unsure what practice locations are on file for you now in CAQH and the TennCare Provider Registration System? You may contact provider.registration@tn.gov for that information.

Don't know how to update your profiles? Obtain our free PDF resource, [How to Update Your Practice Address](#). This simple, easy-to-follow guide will instruct you on making changes in each system.