



## Department of Health

NY Medicaid EHR Incentive Program, A CMS Promoting Interoperability Program

# Pre-Attestation Checklist – Payment Year 2020

This guide is intended to provide eligible professionals (EPs) with a brief overview of the requirements for the NY Medicaid EHR Incentive Program. Please review the checklists and click the blue hyperlinks to navigate to valuable resources that will assist you in preparing to attest to meaningful use of certified EHR technology (CEHRT).



## Prerequisites

EPs must meet the following criteria to successfully attest for Payment Year (PY) 2020 in [MEIPASS](#).

|   |  |
|---|--|
| <input type="checkbox"/> <b>Prior Program Participation</b>         | <p>EPs must receive an incentive payment for at least one participation year in Payment Year 2016 or earlier to continue participation for PY2017 and beyond. If you have not, you may not be eligible to attest for PY2020. For additional details, please see <a href="#">FAQ EP90</a></p>   |
| <input type="checkbox"/> <b>Non-Hospital Based</b>                  | <p>If an EP renders 90% or more of their services in an inpatient acute care or emergency department (place of service code 21 or 23), they <u>will not qualify</u> to attest under program guidelines. EPs are encouraged to <u>determine</u> whether or not they would be considered a Hospital-Based Provider prior to attesting.</p> |
| <input type="checkbox"/> <b>EHR Certification ID</b>                | <p>Visit the <a href="#">Certified Health IT Products List (CHPL)</a> to obtain the certification ID for your EHR system. Please note that EPs must have used 2015 Edition certified EHR technology (CEHRT) in order meet the Stage 3 requirements for PY2020.</p>   |
| <input type="checkbox"/> <b>Fee-for-Service Medicaid Enrollment</b> | <p>All EPs and Payees must be enrolled as NY Medicaid fee-for-service providers for the duration of the attestation and payment process. If you or your Payee need to revalidate your Medicaid Enrollment, please review the <a href="#">revalidation information</a> available from eMedNY.</p>   |
| <input type="checkbox"/> <b>Medical License</b>                     | <p>All EPs must have an up-to-date and active Medical License for the duration of the attestation and payment process. To update or check the status of your Medical License, please contact the <a href="#">Office of the Professions</a>.</p>  |





## Payment and Contact Information

EPs should review the following systems and information to ensure that they can be contacted to resolve any issues, and that payment can be assigned as they wish.

|  |  |
|--|--|
| <input type="checkbox"/> <b>ETIN</b>             | <p><a href="#">Electronic Transmitter Identification Numbers (ETINs)</a> link an EP to an ePACES account and allow them to bill electronically. ETIN certification must be completed on an annual basis and must be signed by a notary to be considered valid.</p>   |
| <input type="checkbox"/> <b>ePACES</b>           | <p>The <a href="#">ePACES</a> user name and password are used to submit your attestation online through <a href="#">MEIPASS</a>. All EPs must be linked to a valid ePACES account to avoid any issues or errors when submitting their attestations.</p>  |
| <input type="checkbox"/> <b>CMS Registration</b> | <p>Access and review your <a href="#">CMS Registration</a> to ensure that your contact information, payee, and personal information are all up to date.</p> <p><b>Note:</b> Your CMS Registration ID is also required to submit your attestation in MEIPASS. If you do not know your CMS Registration ID, please email our support team at <a href="mailto:hit@health.ny.gov">hit@health.ny.gov</a>.</p>   |
| <input type="checkbox"/> <b>Affiliations</b>     | <p>If you wish to re-assign your incentive payment to another entity, please ensure that your affiliation with that entity is current.</p> <p><b>For Group Practices:</b><br/>Please complete the appropriate sections of the <a href="#">New York State Medicaid Program Group Affiliation/Disaffiliation Request Form</a>.</p> <p><b>For Facilities/Hospitals:</b><br/>The administrator responsible for this information can add additional EP's to the facility using the <a href="#">Facilities Practitioner's NPI Reporting Portal</a>*.</p> <p>*For additional information on how to complete this process, please see pages 9-10 in the <a href="#">Facilities Practitioner's NPI Reporting Guide</a>.</p> |

## ETIN, ePACES, and MEIPASS Credential Support

If you or your organization are experiencing issues related to your ETIN or ePACES account, please contact **877-646-5410 Option 1**.

## Medicaid Patient Volume (MPV)

For each participation year, EPs must demonstrate at least 30% [Medicaid Patient Volume](#) for a continuous 90-day reporting period.

|  |   |
|--|---|
| <input type="checkbox"/> <b>Reporting Period</b>     | MPV reporting period must be a <a href="#">continuous 90-day period</a> from either the previous calendar year or 12 months preceding the attestation date.<br><br><i>Note: EPs <b>cannot</b> utilize the same MPV reporting period or overlapping MPV reporting periods for multiple Payment Years. (<a href="#">FAQ EP92</a>)</i> |
| <input type="checkbox"/> <b>Standard Calculation</b> | Using this method, an EP counts the number of Medicaid patient encounters during the 90–day reporting period and divides that number by the total number of patient encounters over the same period.  |
| <input type="checkbox"/> <b>Group Aggregate</b>      | EPs in a group practice or clinic may use <a href="#">aggregate patient volume</a> as a proxy for individual data.  |
| <input type="checkbox"/> <b>Needy Patients</b>       | EPs who practice predominantly at a Federally Qualified Health Center (FQHC) or Rural Health Clinic (RHC) may include <a href="#">additional encounter types</a> .  |
| <input type="checkbox"/> <b>Pediatricians</b>        | Pediatricians may demonstrate 20-30% patient volume but will only <a href="#">receive two-thirds of the incentive payment</a> when under 30%.   |



### Pre-validation Services

If an EP or group have already selected their reporting period and calculated their patient volume prior to the MEIPASS attestation system being opened for the payment year, they are able to complete a pre-validation ([FAQ EP57](#)). This allows practices to submit their patient volume data for review and approval ahead of attestation and can help the EP advance through the review process more quickly once MEIPASS begins accepting attestations.

**For Individual EPs:** Please complete the Provider Details section of the [Individual EP Pre-Validation Form](#)

**For Group EPs:** Please complete the Organization Detail section of the [Group EP Pre-Validation Form](#)

When submitting a pre-validation file, please keep the following in mind:

- ✓ It is recommended that EPs select data from the previous calendar year, as this helps protect against the possibility of selected dates timing out.
- ✓ You may be required to submit additional information to support your pre-validation data.

**Note:** EPs may begin submitting pre-validations for PY2020 on September 14, 2020. The deadline to submit pre-validations for PY2020 is December 14, 2020. When MEIPASS opens for the Soft Opening and the official opening, there is no need to pre-validate; instead, EPs are advised to submit their attestations in MEIPASS if they are ready to.



## Meaningful Use (MU)

EPs must begin attesting to Meaningful Use in their second participation year (after completing AIU).

|  |   |
|--|---|
| <input type="checkbox"/> <b>EHR Reporting Period</b> | EPs must select a minimum continuous 90-day period within the calendar year being measured.   |
| <input type="checkbox"/> <b>Meaningful Use Stage</b> | EPs must attest to <a href="#">Stage 3</a> reporting for PY2020.<br><i>Note: Any EP who did not have a 2015 Edition CEHRT installed and in use during calendar year 2020 would not be eligible to attest to Stage 3 Meaningful Use.</i> |
| <input type="checkbox"/> <b>CQM Reporting Period</b> | The CQM reporting period for PY2020 is a minimum continuous 90-day period within the calendar year being measured.  |
| <input type="checkbox"/> <b>CQMs</b>                 | EPs must report on at least 6 Clinical Quality Measures ( <a href="#">CQMs</a> ) relevant to their scope of practice, including at least one outcome or high-priority measure.  |
| <input type="checkbox"/> <b>Multiple Locations</b>   | <a href="#">EPs who practice in multiple locations</a> must collect MU data from all locations with certified EHR technology.   |



## Public Health Reporting

EPs should register their intent in the Meaningful Use Registration for Public Health (MURPH) system to submit data to a New York Sponsored Public Health Registry within 60 days of the start of their EHR reporting period.

|  |  |
|--|--|
| <input type="checkbox"/> <b>MURPH Registration</b>       | EPs should register their intent to submit data to a New York State Public Health Agency (PHA) in the <a href="#">MURPH</a> system, even if they are already engaged with a PHA. The latest this should occur is <a href="#">within 60 days</a> of the EHR reporting period start date.                      |
| <input type="checkbox"/> <b>Active Engagement Status</b> | EPs can be in Active Engagement Option 1, 2, or 3 to meet the criteria for a measure. To determine what status you were in during your reporting period, you may access your Audit Report Card or contact the registry directly. For more information, please see <a href="#">Public Health FAQ 1.1</a>      |
| <input type="checkbox"/> <b>Audit Report Card</b>        | If you are already registered in the MURPH system, your registration contact can view your active engagement status for your chosen reporting period using the <a href="#">Audit Report Card</a> function of MURPH.  |
| <input type="checkbox"/> <b>Clinical Data Registries</b> | If an EP chooses to submit data to a registry that is not supported by a New York State PHA, they <a href="#">will not have onboarding or post-payment audit support provided by NYS</a> . Because of this, EPs are encouraged to maintain diligent records of their status with any Clinical Data Registry. |



## PY2020 Soft Opening

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For the final years of the program, there will be something called a “Soft Opening” available to providers who are ready to attest prior to the official payment year open date. If a provider wishes to take advantage of this option, they must meet the following criteria in addition to regular program thresholds:

- Be paid for any prior payment years before attesting in the soft opening.
- Have EHR, CQM and Medicaid Patient Volume (MPV) reporting periods ending prior to the date of attestation.
- Have completed a Security Risk Analysis prior to attesting.

This Soft Opening will allow providers to submit their attestations in much the same way they would during the Official Opening, but will occur within the reporting year. This will give providers more opportunities to attest as the timeframes between payment years become shorter. If you have any questions regarding the Soft Openings or other program changes specific to PY2020-2021, please see our [Program Discussion Webinar](#) and [Program Website](#) for more information regarding these topics.



## Updated CEHRT ID

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As the program moved from Modified Stage 2 to Stage 3 reporting, the Certified EHR Technology (CEHRT) requirements for the program shifted from the 2014 Edition to the 2015 Edition. Many providers were aware of this and upgraded their systems as needed, but did not update the CEHRT ID listed in their [CMS Registration](#). CEHRT IDs are given to all EHRs that meet the 2015 Certification Criteria, and can be found by contacting your vendor or searching for your CERHT information on the [CHPL website](#).

Once input in the CMS Registration, CEHRT IDs cannot be edited in MEIPASS. To ensure that all attesting meet the Stage 3 requirements, those who have 2014 and older CEHRT IDs entered in this way will not be able to submit their attestations until they are removed. To avoid any problems or delays associated with this issue, it is recommended that providers remove any CEHRT ID(s) from their CMS Registration entirely. This will allow the information to be input directly in MEIPASS, without the 24 – 48 hour waiting period that occurs when updating the CMS Registration.

We recommend updating and reviewing the CMS Registration to ensure all contact information, provider information, and program related information is correct prior to attestation. To learn more about updating your CMS Registration, please see the [Registration User Guide](#).

If you are unable to access your CMS Registration due to issues with your username or password, please contact the [External User Services Help Desk](#) at:

**Phone:** 1-866-484-8049

**Email:** [EUSupport@cgi.com](mailto:EUSupport@cgi.com)



## Identity & Access Connection (I&A)

If an administrator will be completing attestations on behalf of all EPs in a practice/organization, they will need an [Identity & Access \(I&A\)](#) account with the correct permissions. This allows the administrator to access the CMS Registration System and attest on behalf of all EPs connected to their account.

There are multiple roles that would allow a user to act on behalf of an EP, as well as complete other tasks for a practice or organization. To determine which actions are allowed by your role, please see the chart below.

| Role                | Represent an Organization | Manage Staff | Approve/Manage Connections | Act on behalf of a Provider in CMS Systems |
|---------------------|---------------------------|--------------|----------------------------|--|
| Individual Provider | Yes                       | Yes          | Yes                        | Yes  |
| Authorized Official | Yes                       | Yes          | Yes                        | Yes  |
| Delegated Official  | Yes                       | Yes          | Yes                        | Yes  |
| Staff End User      | No                        | No           | No                         | Yes  |
| Surrogate           | No                        | No           | No                         | Yes  |

For more information regarding the sign on process and available user roles, please review the [I&A Quick Reference Guide](#). If your question is not addressed in this guide, please review the [I&A Frequently Asked Questions](#).

**Note:** I&A account credentials cannot be used to log into MEIPASS. The I&A account may serve to give the administrator the legal authority to attest on an EP's behalf, but does not provide immediate MEIPASS access. MEIPASS uses ePACES login credentials, so the EP and administrator must be linked to the same ePACES account in order for the administrator to complete the EP's attestation.



## Program Integrity

Attestations must truly reflect the EHR activities performed during the payment year. Considering the possibility of post-payment audit, EPs are required to retain documentation in support of all attestations for no fewer than six years from the date of attestation.

If you have questions regarding Post-Payment Audit, please contact [hitech@omig.ny.gov](mailto:hitech@omig.ny.gov) or visit our [Post-Payment Audit Guidance](#) webpage for more information.

## Program Resources



What should you do first? Below are suggested actions in preparation to attest.

Visit [https://www.health.ny.gov/health\\_care/medicaid/redesign/ehr/](https://www.health.ny.gov/health_care/medicaid/redesign/ehr/)

Our website contains up to date program information and resources, including:

- [Webinars](#)
- [Email LISTSERV](#)
- [Step-by-step attestation guides for MEIPASS](#)
- [Frequently Asked Questions \(FAQs\)](#)



### Contact a Regional Extension Center (REC)

New York State has two RECs that provide support services to healthcare providers as they navigate the EHR adoption process and achievement of meaningful use.

|                                 |   |
|---------------------------------|---|
| <b>Within New York City</b>     | <b>NYC Regional Electronic Adoption Center for Health (NYC REACH)</b><br>Website: <a href="http://www.nycreach.org">www.nycreach.org</a><br>Email: <a href="mailto:nycreach@health.nyc.gov">nycreach@health.nyc.gov</a><br>Phone: 347-396-4888                      |
| <b>Outside of New York City</b> | <b>New York eHealth Collaborative (NYeC)</b><br>Website: <a href="http://www.nyehealth.org/services/meaningful-use">www.nyehealth.org/services/meaningful-use</a><br>Email: <a href="mailto:ep2info@nyehealth.org">ep2info@nyehealth.org</a><br>Phone: 646-817-4101 |



### Calculate your Medicaid patient volume

EPs may complete a [Numerator Request Form](#) and return it to [hit@health.ny.gov](mailto:hit@health.ny.gov) to request a summary of Medicaid claims billed under their NPI for a specific reporting period (e.g. calendar year 2019 or a 90-day period within calendar year 2020). This data is aimed to aid EPs in preparing to attest and determining eligibility.



Contact us at 877-646-5410 or [hit@health.ny.gov](mailto:hit@health.ny.gov)

Questions? We have a dedicated support team that will guide you through the attestation process.

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