Webinar Logistics

• The webinar will begin momentarily.

• For the duration of this webinar you will be in listen-only mode and your station will be muted.

• We welcome your questions, and you can submit them at any time during the Webinar by typing them in the “Questions” section of the GoToWebinar control panel.

• At the end of the presentation we will address your questions during our Q&A session.
NY Medicaid EHR Incentive Program
A CMS Promoting Interoperability Program

Payment Year (PY) 2021 Soft Opening Period
and Security Risk Analysis Process Changes
Agenda

• Soft Opening Definition
• PY 2021 Attestation Timeline
• Process Changes
  • Security Risk Analysis
  • Remediation Process
• Reporting Periods & Requirements
  • Patient Volume
  • CQM Reporting & EHR (Meaningful Use) Reporting
• Preparation & Pre-Validation
• Resources
Soft Opening & PY2021 Timeline
Soft Opening

An early attestation periods that allow qualifying providers to submit in MEIPASS before the Official Opening of the Payment Year.
Payment Year 2021

Key Dates 2021

Soft Opening

Soft Opening Start Date: April 1, 2021

Official Opening

Official Opening Date: July 1, 2021
Official Opening End Date: August 31, 2021
PY2021 Changes
The SRA MUST be conducted

*Within Calendar Year 2021*

but

*Can be completed after the date of attestation*
Changes in MEIPASS

Due to the December 31, 2021 statutory deadline for making incentive payments, an EP may conduct a security risk analysis at any time during Calendar Year 2021, even if that is after the EP attests with New York Medicaid. AEP who has not completed a security risk analysis by the time of attestation will be required to attest that they will complete one by December 31, 2021. New York Medicaid may require EPs to submit evidence that the security risk analysis has been completed as promised, even after the incentive payment has been issued.

Measure:
Protect electronic protected health information (ePHI) created or maintained by the CEHRT through the implementation of appropriate technical, administrative, and physical safeguards.

Conduct or review a security risk analysis in accordance with the requirements in 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), and implemented security updates as necessary and corrected identified security deficiencies as part of the EP’s risk management process.

Have you conducted or reviewed a security risk analysis in accordance with the requirements in 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), and implemented security updates as necessary and corrected identified security deficiencies as part of the EP’s risk management process?

Yes  ☐ No ☐

Do you plan to conduct or review a security risk analysis in accordance with the requirements in 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), and implemented security updates as necessary and corrected identified security deficiencies as part of the EP’s risk management process no later than December 31, 2021?

Yes ☐ No ☐

I understand that I am required to complete a Security risk analysis no later than December 31, 2021, in accordance with the requirements in 45 CFR 164.308(a)(1), including addressing the security (to include encryption) of ePHI created or maintained by CEHRT in accordance with requirements under 45 CFR 164.312(a)(2)(iv) and 45 CFR 164.306(d)(3), and implemented security updates as necessary and corrected identified security deficiencies as part of the EP’s risk management process, no later than December 31, 2021.

I hereby agree to keep such records as are necessary to demonstrate that I met all Medicaid EHR Incentive Program Requirements for the Security risk analysis for a minimum of six years from the date of my signed attestation.

Estimated security risk analysis completion date: ______________

Visa completed by: ________________________

Relationship to Eligible Professional (EP): [ ]

Previous  |  Return to Meaningful Use Objectives  |  Next
Dear Provider:

The NY Medicaid EHR Incentive Program has received your attestation for Payment Year (PY) 2021. While reviewing your submission, it has been noted that the Security Risk Analysis (SRA) completion date you have selected occurs in the future.

As a reminder, providers are required to complete the SRA by the deadline of December 31st, 2021. Because of this, it is important to ensure that this requirement is completed by the appropriate deadline and that documentation related to this process is retained in full. Please review the below action items for additional information.

Action Items:

- Complete a Security Risk Analysis in accordance with the CMS Guidelines prior to December 31st, 2021. Ensure that the process is well documented.
- Retain all documentation related to this process (including the analysis itself, the name of the person or entity completing the analysis, and that person or entity’s relationship to the organization) for a minimum of 6 years from the date your PY2021 attestation was completed. This is necessary to prepare for the possibility of Post-Payment Audit.
- For further information regarding possible Post-Payment Audit and the requirements associated with it, please visit the Post-Payment Audit Home Page. If you have any questions related to this process, contact hitch@omig.ny.gov.

Failure to complete the Security Risk Analysis within the required timeframe will render the provider ineligible for the Incentive Payment. If you find that you will be unable to complete the Security Risk Analysis prior to December 31st, please contact the NY Medicaid EHR Incentive Program support staff. We will assist you in initiating the self-report process and recoupment of incentive funds for Payment Year 2021.

Thank you for your participation in the NY Medicaid EHR Incentive Program. If you have any questions regarding this email, please contact NY Medicaid EHR Incentive Program Support by phone at 877-646-5410 Option 2, or by email at hit@health.ny.gov.

Sincerely,
NY Medicaid EHR Incentive Program
A CMS Promoting Interoperability Program

All providers who select a future date of completion for the SRA will be sent this outreach letter with additional information and instruction.
Pre-Payment Review & Remediation

All attestations are thoroughly reviewed before being approved for payment. If any issues are found during review, the provider is sent outreach indicating what the problem is and how to resolve it.

Please see the Pre-Payment Review Scenarios webpage for additional details on each possible remediation issue.
Reduced Remediation Outreach Response Timeframe

- Initial Outreach Letter
- First Follow-Up Letter
- Final Outreach Letter
Attestation Deadline Extensions (ADEs)

Attestation Deadline Extensions will NOT be offered for PY2021 attestations.

All providers must attest on or before August 31st, 2021 for their submissions to be considered.
MURPH System Service Updates

Meaningful Use Registration for Public Health (MURPH) system support will be ending as of December 31st, 2021.

To prepare for this, review and download your Audit Report Card. Address any discrepancies by July 31st, 2021.

If you have not yet registered in MURPH, the last day to do so is July 30th, 2021.
Requirements & Reporting Periods
Soft Opening Requirements

Program Thresholds
- Providers must meet all relevant program metrics in these timeframes

MPV Reporting
- Continuous 90-day period
- Ending prior to the date of attestation

EHR & CQM Reporting
- Continuous 90-day period in CY2021
- Ending prior to date of attestation

Prior Attestations
- If a provider attested for PY2020, they must receive payment for that year before attesting in the Soft Opening
# Stage 3 Reporting Requirements

## Stage 3 Meaningful Use

## 2015 Edition CEHRT

<table>
<thead>
<tr>
<th>Reporting Period Requirements</th>
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<td>Medicaid Patient Volume (MPV)</td>
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<tr>
<td>EHR Reporting Period</td>
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<tr>
<td>Clinical Quality Measure (CQM) Reporting</td>
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</table>

2021
Certified EHR Technology (CEHRT)

• Minimum requirement: 2015 Edition

• Visit https://chpl.healthit.gov/ to obtain the CEHRT ID
Medicaid Patient Volume (MPV) Reporting

Continuous 90-day period from either:

- Previous calendar year
- Preceding 12 months from the date of attestation
EHR & CQM Reporting Periods

- Continuous 90-day period
- Within the Reporting Year
- Prior to the date of attestation
Preparations
Prior Attestations

Before attesting, determine if the provider submitted for PY2020. If they did, ensure the provider has received payment for that submission prior to attesting for PY2021.

Attesting to a new payment year before payment is received for a prior year will remove the older attestation data. This can cause problems, including disqualifying the provider from the incentive payment for the prior year.
Please review the MEIPASS Attestation Walkthrough prior to attesting to determine what information is needed to complete your attestation.
Pre-Validations

PY2021 Pre-Validations will be accepted from March 15th, 2021 to June 11th, 2021

Group Pre-Validations

Individual Pre-Validations
New PY2021 Pre-Validation Requirements

Medicaid Patient Volume (MPV) Reporting Periods used in PY2021 Pre-Validations must occur within 1/1/2020 – 12/31/2020 and cannot overlap with reporting periods used in prior payment years.

Providers who wish to use a MPV Reporting Period within Calendar Year 2021 are not eligible to Pre-Validate.
## Payment Year 2021 Pre-Attestation Checklist

<table>
<thead>
<tr>
<th>2015 CEHRT</th>
<th>Public Health and Clinical Data Registry Reporting</th>
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<td>Contact and Login Information</td>
<td>MPV Reporting</td>
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<tr>
<td>Medicaid Enrollment &amp; Medical License</td>
<td>EHR Reporting</td>
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<tr>
<td>Security Risk Analysis</td>
<td>CQM Reporting</td>
</tr>
</tbody>
</table>
Resources and Program Reminders
Program Integrity

Retain all supporting documentation for 6 Years

For post payment audit guidance, contact: hitech@omig.ny.gov
or review the materials available on our website
https://www.health.ny.gov/health_care/medicaid/redesign/ehr/audit/
<table>
<thead>
<tr>
<th>Select</th>
<th>Types of Questions/Information</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Option 1</td>
<td>ePACES, ETIN, MEIPASS Technical Issues, Enrollment</td>
<td><a href="mailto:meipasshelp@csra.com">meipasshelp@csra.com</a></td>
</tr>
<tr>
<td>Option 2</td>
<td>Calculations, Eligibility, Attestation Support and Review, Attestation Status Updates, General Program Questions</td>
<td><a href="mailto:hit@health.ny.gov">hit@health.ny.gov</a></td>
</tr>
<tr>
<td>Option 3</td>
<td>Public Health Reporting Objective Guidance, MURPH Registration Support, Registry Reporting Status</td>
<td><a href="mailto:MUPublicHealthHelp@health.ny.gov">MUPublicHealthHelp@health.ny.gov</a></td>
</tr>
</tbody>
</table>
External Resources

CMS Final Rules
CMS Registration & Attestation System
CMS EHR Incentive Program Information
CDC EHR Incentive Program Information
ONC EHR Incentive Program Information
Certified Health IT Product List
Health Commerce System (HCS)
eCQI Resource Center
Regional Extension Centers

NYC Regional Electronic Adoption Center for Health (NYC REACH) (inside the 5 boroughs of NYC)
Website: www.nycreach.org
Email: nycreach@health.nyc.gov
Phone: 347-396-4888

New York eHealth Collaborative (NYeC) (outside the 5 boroughs of NYC)
Website: www.nyehealth.org/services/meaningful-use/
Email: ep2info@nyehealth.org
Phone: 646-619-6400

2021
EHR Incentive Program Survey

The NY Medicaid EHR Incentive Program strives to deliver the best program experience. Please take a few minutes to complete this survey to help make program improvements.

1. How would you rate the phone and email support provided by the NY Medicaid EHR Incentive Program?

- Very Dissatisfied
- Dissatisfied
- Neutral
- Satisfied
- Very Satisfied
- N/A

2. How would you rate the website features provided by the NY Medicaid EHR Incentive Program?

- Very Dissatisfied
- Dissatisfied
- Neutral
- Satisfied
- Very Satisfied
- N/A

3. How would you rate the webinars hosted by the NY Medicaid EHR Incentive Program?

- Very Dissatisfied
- Dissatisfied
- Neutral
- Satisfied
- Very Satisfied
- N/A