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1 INTRODUCTION

The Wisconsin Medicaid Agency is committed to complying with federal regulations and guidance from the Centers for Medicare & Medicaid Services (CMS) to effectively administer and oversee the Wisconsin Medicaid Electronic Health Record (EHR) Incentive Program. This State Medicaid Health Information Technology Plan Addendum provides CMS with an overview of Wisconsin’s plan to address the new requirements for Program Year 2014.

On September 4, 2014, CMS published a Final Rule, *Medicare and Medicaid Programs; Modifications to Medicare and Medicaid Electronic Health Record (EHR) Incentive Program for 2014 and Other Changes to the EHR Incentive Program; and Health Information Technology: Revisions to Certified EHR Technology Definition and EHR Clarification Changes Related to Standards* to the Federal Register, or the 2014 CEHRT Flexibility Rule. The changes specified in the 2014 CEHRT Flexibility Rule take effect on October 1, 2014. The following table contains a high-level overview of the major provisions of the Rule.

Title	Description
Acceptable Certified EHR Technology (CEHRT) Edition	For Program Year 2014, providers that could not fully implement 2014 Edition CEHRT due to delays in EHR product availability or the inability to meet the Stage 2 Meaningful Use Summary of Care Measure have the option to use 2011 Edition CEHRT, or a combination of 2011 & 2014 Edition CEHRT.
Corresponding Objectives and Measures	The Edition of CEHRT available to the provider dictates the stage and version of the meaningful use objectives and measures (and associated clinical quality measures) the provider is able to meet.
Stage 2 Meaningful Use Extension	Stage 2 will extend through Program Year 2016. Stage 3 Meaningful Use will begin in Program Year 2017.



2 IMPACT ANALYSIS & PLAN TO ADDRESS

Wisconsin completed a comprehensive analysis of the final rule to identify information, policy, process and technology impacts to the Wisconsin Medicaid EHR Incentive Program. The following table contains a summary of the impacts and Wisconsin's plan to address the impacts for Program Year 2014.

Category	Impacted Area	Wisconsin Approach to Address
Information	Communications & Outreach Marketing Materials	Wisconsin will revise communications & outreach marketing materials to align with the 2014 CEHRT Flexibility Rule. Wisconsin will also review and revise the timeline for distribution of materials. These activities will be completed by January 31, 2015.
Information	Professional Organizations	Wisconsin will distribute updated Program Year 2014 participation information to Wisconsin professional organizations, including the Regional Extension Center (WHITEC), to encourage provider's continued participation in the Program.
Information	Public Health Meaningful Use Website and Registration Site	Wisconsin intends to update the content of the Public Health Meaningful Use website and Registration site by January 31, 2015.
Information	Wisconsin Medicaid EHR Incentive Program Website	Wisconsin intends to update the Program website by January 31, 2015.
Information	Wisconsin Medicaid EHR Incentive Program User Guides	Wisconsin intends to update User Guides by January 31, 2015.
Policy	ForwardHealth Updates	Wisconsin issues formal policy guidance through communication updates, called ForwardHealth Updates. Wisconsin published revised ForwardHealth Updates for Eligible Hospitals and Eligible Professionals on October 30, 2014, to explain the 2014 CEHRT Flexibility Rule.



Category	Impacted Area	Wisconsin Approach to Address
Policy	Program Year 2014 Grace Period Extension	On September 23, 2014, Wisconsin received approval from Diane Dunstan-Murphy (CMS) to extend the Program Year 2014 grace period for Eligible Hospitals and Professionals to May 31, 2015. Wisconsin published this information on October 30, 2014.
Policy	Provider Handbook	Wisconsin has an online Provider Handbook that contains comprehensive information regarding Medicaid policies. The topics related to the Wisconsin Medicaid EHR Incentive Program were revised on October 30, 2014.
Policy	Public Health Reporting	Wisconsin policy will reiterate that providers are required to continue the process of enrolling with and reporting to the Public Health Agency as per the requirements of the meaningful use objectives related to public health reporting. Further, if a provider sent a test message to a Public Health Agency in a previous EHR reporting period and chooses to report 2013 Stage 1 objectives and measures or the 2014 Stage 1 objectives and measures with a CEHRT flexibility option, Wisconsin policy will align with the CMS rule and not require the provider to send another test message to meet the public health measure(s) for Program Year 2014.
Process	Post-Payment Audit	The Final Rule states that Auditors will be provided guidance related to reviewing attestations associated with the options for using CEHRT. Wisconsin will review existing Audit processes to determine if changes are required to the processes and tools once more specific guidance is provided by CMS.



Category	Impacted Area	Wisconsin Approach to Address
Process	CMS-37 Incentive Payment Estimates	Wisconsin will review and revise projected quarterly incentive payment estimates. The revised estimates will be reflected in the January 2015 submission.
Process	Implementation Advanced Planning Document – Update (IAPD-U)	Wisconsin will submit an IAPD-U if additional funding is required to complete the work plan for implementing changes to the Medicaid EHR Incentive Program necessitated by the 2014 CEHRT Flexibility Rule. As of December 4, 2014, no update is needed.
Process	Prepayment Validation	Wisconsin will revise prepayment validation processes and tools to align with the 2014 CEHRT Flexibility Rule. Wisconsin will continue to participate in CMS HITECH All States Calls and Community of Practice (CoP) meetings to stay informed regarding CMS guidance.



Category	Impacted Area	Wisconsin Approach to Address
Technology	Medicaid Assistance Provider Incentive Repository (MAPIR)	<p>MAPIR is the Wisconsin state level repository (SLR). The MAPIR Collaborative submitted business requirements to the technical vendor, and the teams collaborated to establish a timeline for development, testing, and implementation.</p> <p>For Program Year 2014, the MAPIR workflow will be redesigned to prompt a provider to enter his/her CMS CEHRT ID early in the attestation process. Based on the CEHRT ID, MAPIR will determine the CEHRT Edition and present providers with corresponding options for attestation consistent with the Final Rule. Providers using a CEHRT flexibility option will be required to attest to a statement indicating they were unable to fully implement 2014 CEHRT.</p> <p>MAPIR code will be delivered to states on December 19, 2014. Wisconsin anticipates the MAPIR system changes will be tested and implemented in Wisconsin's production environment by January 31, 2015.</p>
Technology	Audit Program	<p>Wisconsin's Audit systems (SURS Case Tracker, Risk Profiler, and DSS Reports) may be impacted by changes to MAPIR.</p> <p>Wisconsin will continue to evaluate if MAPIR design changes impact the Audit Program. In compliance with CMS guidance, this evaluation will be completed no later than four months after the first CEHRT Flexibility Rule payment is issued.</p>



Category	Impacted Area	Wisconsin Approach to Address
Technology	Data Warehouse: Medicaid EHR Incentive Program Universe	Wisconsin uses a Medicaid EHR Incentive Program data universe for program reporting. This data universe may be impacted by changes to MAPIR. Wisconsin will continue to evaluate if MAPIR design changes impact the Medicaid EHR Incentive Program Universe.