

Tips for *Eligible Hospitals* Selected for a Post-payment Review of the MO HealthNet Electronic Health Record (EHR) Incentive Program Payment.

Why is the State conducting audits of the State Medicaid EHR Incentive Program payments?

Section 1903(t)(2) of the HITECH Act states that all Eligible Hospitals (with the exception of Children's Hospitals) need to meet certain patient volume thresholds in order to be eligible for incentive payments. The *Medicare and Medicaid Program Electronic Health Record Incentive Program Final Rule* issued by the Department of Health and Human Services Centers for Medicare and Medicaid Services (CMS) explains that States are responsible for auditing the program and must have reliable sources of data. Because the Missouri Department of Social Services is accountable to CMS for the incentive payments made, we are conducting reviews of some incentive payments. It is possible that you might be selected for a review for any installment of the incentive payments.

What can I expect if I am selected for a desk review or on-site review?

You will receive a notification letter that will indicate if the review will be completed as a desk review or an on-site review by our contractor, Myers and Stauffer LC. You can also expect to be contacted by e-mail and/or phone by Myers and Stauffer LC. The letter will list the initial documentation needed to complete the review. Providing the documentation in a secure electronic format is preferable to paper documents. Depending on the information provided, Myers and Stauffer LC may request additional information. In the event that Myers and Stauffer LC determines the information to which you attested was not in accordance with the Final Rule, Myers and Stauffer LC will review additional documentation. These documents will be specific to the 90-day period to which you attested that is in accordance with program regulations that demonstrates that the documented patient volume meets the minimum eligibility threshold using appropriate calculation methods. Documents specific to meaningful use attestations will be requested from those attesting to meaningful use. Failure to document eligibility and the payment calculation or failure to cooperate with Myers and Stauffer LC may result in recoupment of the incentive payment. The Missouri Department of Social Services will notify you of the results of the review. Any payment adjustments will be reflected in the next incentive payment you receive. If you do not agree with the results you may appeal the decision in accordance with our appeals process through the Administrative Hearing Commission.

What should I be able to document?

All information under attestation is subject to audit. This includes documentation for both the eligibility determination AND the payment calculation. This documentation should be readily available because it was needed for attestation.

At a minimum, the detailed information to validate eligibility should include patient name, Medicaid member ID, if applicable, date of service, and payer source. Eligibility information that you attested to includes:

- Numerator: A detailed list of Medicaid Inpatient and Emergency Room encounters during your selected 90-day period for which Medicaid paid an amount greater than

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zero, excluding nursery days, and sub-provider days. If you did not utilize the CHIP factor, the numerator should exclude CHIP encounters.

- Denominator: A detailed list of all Inpatient and Emergency Room encounters (the numerator should be an identifiable sub-set of the denominator) that occurred during the 90-day period.

At a minimum, the detailed information to validate the payment calculation includes census, financial, or other internal reports to support Discharges, Acute Medicaid Days (fee-for-service and MCO with the same exclusions listed above), Total Acute Days, Charity Care/Other Uncompensated Care Charges, and Total Hospital Charges. Cost reports are often utilized in the payment calculation; however, the cost report by itself is not sufficient documentation because cost reports are self-reported.

Will the Missouri Department of Social Services be conducting audits of Meaningful Use Measures and Clinical Quality Measures?

Yes. It is important for you to maintain detailed documentation supporting your eligibility and meaningful use attestations. This documentation includes the information listed above for eligibility plus the detailed list of encounters that make up all meaningful use and clinical quality measures' numerators and denominators to which you attested. You must also maintain documentation supporting exclusions, and "yes"/"no" attestations. If at the time of the review you have been paid more than one incentive payment, then the scope of the review may include all payments received to date.