2014 Meaningful Use Attestation and CMS Audit Preparedness

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Summary

Attendees will take away from this presentation:

• How to prepare for a Meaningful Use attestation
• How to survive a Meaningful Use audit
• What you need to know for audit compliance
• How to prepare your attestation in OneView
How to prepare for a Meaningful Use attestation

Is your hospital using fully certified software for attestation?

Make sure you have a copy of the certification documentation when you secure your CMS ID number and also in your attestation book of evidence supporting documentation.

You can check your vendors' certifications by going to the Certified Health IT Product List (CHPL) website.

http://oncchpl.force.com/ehrcert?q=CHPL
How to prepare for a Meaningful Use attestation

Was the certified software installed for the full reporting period date range?

Provide documentation including software name and version number with proof showing you were using all certified solutions. The version numbers are critical for audit compliance.

How to prepare for a Meaningful Use attestation

Do you have proof that all required certified software was in place and in use during the entire reporting period?

Owning it and using are two different issues to the auditor.

How to prepare for a Meaningful Use attestation

Have you requested letters from vendors for proof of ownership and access?

Have you requested letters from ALL of your software vendors verifying that you owned and used the certified version during the full reporting period?

The letter should also cite the criteria for which the software is certified, cite the version numbers, and signed by a company representative.
How to prepare for a Meaningful Use attestation

Are you monitoring measures?

Numerator, denominator and performance rates should be checked frequently during your reporting period to make sure your scores are meeting CMS thresholds.

Utilize alerting and subscription features in OneView to trigger emails when measures are near or fall below thresholds.
How to prepare for a Meaningful Use attestation

Do you have documentation on the reporting method your hospital selected?

CMS auditors want to see a document explaining why you selected one of the reporting methods; Observation Method or ALL ED Method.

Sample letter
How to prepare for a Meaningful Use attestation

Reporting measures that are Yes/No based also need supporting documentation.

You must have proof that demonstrates that this functionality was active throughout the entire reporting period.

Sample drug-drug / drug-allergy audit report
How to prepare for a Meaningful Use attestation

Are you including vendor name and version number on the summary and detail reports?

The auditors request that any supporting documentation include vendor name and version number from the vendor of record to prove that the reports were created from a Meaningful Use certified system.

Sample core measure summary report
How to prepare for a Meaningful Use attestation

Have you completed a security risk analysis?

The Office of the National Coordinator for Health Information Technology has published the "Guide to Privacy and Security of Health Information" as a reference.

Page 26 Step 10: Attest for the Security Risk Analysis MU Objective:

Providers can register for the EHR Incentive Programs anytime, but they can only attest after they have met the meaningful use requirements for an EHR reporting period. Only attest for an EHR incentive program, after you have fulfilled the security risk analysis requirement and have documented your efforts.

Do not attest for an EHR Incentive program until you have conducted your security risk analysis (or reassessment) and corrected any deficiencies identified during the risk analysis. Document these changes.
How to prepare for a Meaningful Use attestation

Have you generated a patient list report?

Generating at least one report listing patients of the eligible hospital or CAH with a specific condition.

Sample core measure patient list
How to survive a Meaningful Use Audit

Who is conducting the audits and at what percentage?

Since 2012, CMS, through its contractor, Figliozzi and Company, has audited the meaningful use attestations of EPs and EHs that participate in the Medicare EHR Incentive Program.

American Medical Association (AMA) indicated between 5% to 10% of hospitals or “eligible professionals” are being targeted for a Meaningful Use audit.
How to survive a Meaningful Use Audit

Pre-Payment audit and Post-Payment Audit - No Longer "pay and chase"

An audit can be a pre-payment or a post-payment audit and may be a desk audit or a field (on-site) audit.

During a field audit, auditors may require a demonstration of the Certified EHR.
How to survive a Meaningful Use Audit

Pre-Payment Audit:

January 1, 2013 - CMS started conducting EHR Incentive Program pre-payment audits

Pre-payment audits check supporting documentation to validate attestation data before CMS releases their incentive payment.
How to survive a Meaningful Use Audit

Post-Payment Audit:

Post-payment audits require supporting documentation to validate submitted attestation data.

A failed audit could result in CMS recoupment of its incentive payments, and the discovery of knowingly false claims could lead to additional civil penalties and criminal prosecution.
How to survive a Meaningful Use Audit

How long should I retain the data?

An audit can occur anytime in the six-year period following attestation. CMS has recommended maintaining these records for at least six years following attestation.

Maintain all attestation documentation in a well organized, centralized location that is secure and backed up. If not electronic, then a second copy to an offsite bunker.

Due to the statute of limitations under the federal False Claims Act, it is recommended that all records be maintained for at least 10 years.
How to survive a Meaningful Use Audit

How will you be contacted for your audit?

You will receive an email notification from ...@figliozzi.com and signed by Peter Figliozzi CPA, CFF, FCPA.

Make sure this email address domain is white listed in your email system so it will not be identified as spam.

Also, email address being sent to will be the CMS Registration and Attestation website email address so make sure that email address is active and up-to-date.
How to survive a Meaningful Use Audit

What to do if I'm contacted?

Immediately contact your vendors for assistance during the audit.
How to survive a Meaningful Use Audit

Sample of the Audit Request Letter

Sample of the Audit Request Letter
How to survive a Meaningful Use Audit

What if audit criteria is not met?

You will receive a **Follow-Up Request**

Core Measure #2 Drug Interaction Checks: The screenshots provided demonstrate the drug interaction check functionality in the EHR system. However, is there any additional documentation that you could supply to prove that this functionality was enabled for the entire EHR reporting period?

Proof of Access - We are unable to verify the formulary product version number utilized during the attestation period. An example of sufficient documentation would be a letter from the vendor stating the product version number the EP utilized during the attestation period.
How to survive a Meaningful Use Audit

Final Follow-up Request

You will receive a **Final Follow-up Request**

Based on our review of the submitted documentation to date, we have determined that you have **not** supplied sufficient documentation for the following....

Please submit the requested information by 5/20/2014. **After this date, we will be making the final audit determination.** Please be aware that if the aforementioned meaningful use criteria are **not** met, **the incentive payment will be recouped.**
Attestation Process for a Hospital

Timelines

For FY 2014, Hospitals and EP have up to 60 days after the reporting period to submit their attestation online.

EH - November 29th Final Day

EP - February 28th Final Day
Attestation Process for a Hospital

Attestation User Guide

Step-by-Step guide for EH's.

Attestation Process for a Hospital

Obtain EHR Certification Identification Number

CMS EHR Certification Identification Number is a number generated by the Certified Health IT Product List (CHPL) used for reporting to CMS for Meaningful Use attestation. It represents a product or combination of products in the CHPL.

**Warning!!!** Do not use the vendor product certification number

Each Hospital must obtain their own unique CMS EHR Certification ID from the Certified Health IT Product List website cart.

Attestation Process for a Hospital

Steps to obtaining CMS EHR Certification ID

Add product(s) to the cart to determine if your product(s) meet 100% of the required criteria. http://oncchpl.force.com/ehrcert

The CMS auditing firm uses the same CMS website to verify you have met 100% of the required criteria.
100% Criteria Met

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<th>Original Practice Type</th>
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<th>Product</th>
<th>Product Version #</th>
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<th>Additional Software Required</th>
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90% Criteria Met

2 PRODUCT(S) IN CART

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Attestation Process for a Hospital

Request a CMS EHR Certification ID for CMS registration or attestation from your cart page

Once you request the CMS EHR Certification ID save the file in OneView book of evidence for supporting documentation
Attestation Process with OneView

Stop compilation job

We disable the compilation process once Medical Records has completed coding and abstracting for the reporting period and the hospital is ready to attest.
Attestation Process with OneView

Hospital Settings

Hospital settings should be updated to include information for the current reporting period that will need to be submitted to CMS.
Attestation Process with OneView

Lock Attestation

- Begin attestation submission
- Select appropriate reporting period and timeframe
- Green checks are good
- Red X's are bad
Attestation Process with OneView

Lock Attestation

<table>
<thead>
<tr>
<th>Measure</th>
<th>Description</th>
<th>Numerator</th>
<th>Denominator</th>
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<td>59555</td>
<td>85334</td>
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<td>CM-1b</td>
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<td>96226</td>
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<td>CM-2</td>
<td>Record demographics</td>
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<td>CM-3</td>
<td>Record and chart changes in vital signs</td>
<td>7847</td>
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<td>CM-4</td>
<td>Record smoking status for patients 13 years old or older</td>
<td>6187</td>
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<td>CM-6a</td>
<td>EHR available online within 36 hours of discharge</td>
<td>5026</td>
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<td>Provide patients the ability to view online, download, and transmit information about a hospital admission</td>
<td>5026</td>
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<td>Incorporate clinical lab test results as structured data</td>
<td>155241</td>
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Attestation Process with OneView

Lock Attestation

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<tr>
<th>Business Name</th>
<th>Tax Identification Number (TIN)</th>
<th>CMS Certification Number (CCN)</th>
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Attestation Process with OneView

Attestation Archived

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<td>View Measures Reports</td>
<td>View attestation reports for all measures during the attestation reporting period</td>
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<tr>
<td>View Dictionaries</td>
<td>View all dictionaries for the attestation reporting period</td>
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<tr>
<td>View Attestation Data Report</td>
<td>View attestation data submitted to CMS for reporting period</td>
</tr>
<tr>
<td>View Supporting Documentation</td>
<td>View all supporting documentation for the attestation reporting period</td>
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Attestation Process with OneView

Book of Evidence
Questions