

## **Medicaid EPs Avoid Medicare Payment Adjustment - Alternate Method of Demonstration for Certain Medicaid Providers Beginning in 2015**

In the EHR Incentive Programs in 2015 through 2017 Medicaid EPs have the option of attesting through the [CMS EHR Incentive Program Registration and Attestation system](#)<sup>1</sup> for the purpose of avoiding the Medicare payment adjustment. This alternate method allows EPs who have previously received an incentive payment under the Medicaid EHR Incentive Program (for either AIU or meaningful use) to demonstrate that they are meaningful EHR users **in situations where they fail to meet the eligibility criteria for the Medicaid EHR Incentive Program** in a subsequent year.

- Use of the alternate method = **NO** incentive payment
- This alternate method does NOT constitute a switch from the Medicaid EHR Incentive Program to the Medicare EHR Incentive Program.
- For the purposes of the Medicaid EHR Incentive Program, an EP's use of this alternate method would be treated the same as if the EP had not attested to meaningful use for that year.
- For an EP who uses this alternate method, their EHR reporting period in a subsequent year for the Medicaid EHR Incentive Program would be determined without regard to any previous attestations using this alternate method.
- A provider may not use the alternate attestation option to attest to meaningful use in Medicare to avoid a payment adjustment in conjunction with an attestation for an incentive payment in the Medicaid program in the same year.
- Medicaid EPs seeking to exercise this option must attest in the Medicare system and in accordance with the requirements for the Medicare EHR Incentive Program in order to successfully demonstrate meaningful use and avoid the Medicare payment adjustment.

For an EHR reporting period 2015, an EP who has not successfully attested to AIU or meaningful use in either the Medicare or Medicaid program may use the alternate attestation option under the Medicare EHR Incentive Program to avoid a payment adjustment in 2016 and 2017. The EP may attest to meaningful use in the Medicaid program for an EHR reporting period in 2016 if they meet the eligibility and other requirements for the Medicaid EHR Incentive Program.

More information is available in the [final rule](#)<sup>2</sup>:

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<sup>1</sup> <https://ehrincentives.cms.gov/hitech/login.action>

<sup>2</sup> <https://www.federalregister.gov/articles/2015/10/16/2015-25595/medicare-and-medicare-programs-electronic-health-record-incentive-program-stage-3-and-modifications>