

**STATE OF ALASKA**  
**DEPARTMENT OF HEALTH AND SOCIAL SERVICES**  
**DIVISION OF HEALTH CARE SERVICES**



**STATE MEDICAID HIT PLAN**  
**ADDENDUM FOR FLEXIBILITY**  
**RULE**

VERSION 1.0

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## **1 EXECUTIVE OVERVIEW**

### **1.1 Background**

In August 2014, Centers for Medicare & Medicaid Services (CMS) released a final rule that grants flexibility to providers who are unable to fully implement 2014 Edition certified electronic health record technology (CEHRT). This final rule changes the meaningful use stage timeline and the definition of CEHRT to allow options in the use of CEHRT for the Electronic Health Record (EHR) reporting period in 2014. It also sets the requirements for reporting on meaningful use objectives and measures as well as clinical quality measure (CQM) reporting in 2014 for providers who use one of the CEHRT options finalized in this rule for their EHR reporting period in 2014.

In addition, it finalized revisions to the Medicare and Medicaid EHR Incentive Programs to adopt an alternate measure for the Stage 2 meaningful use objective for hospitals to provide structured electronic laboratory results to ambulatory providers; to correct the regulation text for the measures associated with the objective for hospitals to provide patients the ability to view online, download, and transmit information about a hospital admission; and to set a case number threshold exemption for CQM reporting applicable for eligible hospitals and critical access hospitals (CAHs) beginning with FY 2013.

Finally, this rule finalized the provisionally adopted replacement of the Data Element Catalog (DEC) and the Quality Reporting Document Architecture (QRDA) Category III standards with updates versions of these standards.

Providers scheduled to demonstrate Stage 2 of meaningful use for an EHR reporting period in 2014 that have not fully implemented 2014 Edition CEHRT can:

- Demonstrate 2013 Stage 1 objectives and 2013 CQMs with 2011 Edition CEHRT or a combination of 2011 and 2014 Edition CEHRT
- Demonstrate 2014 Stage 1 objectives and 2014 CQMs with 2014 Edition CEHRT or a combination of 2011 and 2014 Edition CEHRT
- Demonstrate Stage 2 objectives and 2014 CQMs with 2014 Edition CEHRT or a combination of 2011 and 2014 Edition CEHRT

## **2 SYSTEM CHANGES RELATED TO FLEXIBILITY RULE**

### **2.1 Changes to EP Workflow**

#### **2.1.1 Changes at Login/Attestation Creation**

At login for PY2014, the Eligible Professional (EP) is presented with a page where the EHR Certification ID is entered. Once the ID is entered, the EP is presented with a set of attestation options based on the CEHRT edition associated with the ID entered. Validation is done as follows:

- If characters 3-5 of the number entered are 14E, the system displays options for 2014 CEHRT
- If characters 3-5 of the number entered are H13, the system displays options for 2011/2014 combined CEHRT
- If characters 3-5 of the number entered are any combination OTHER than 14E or H13, the system shall display 2011 CEHRT options.



### **2.1.1.1 2011 CEHRT Entered**

If the EP enters a 2011 CEHRT ID, the system displays a single attestation statement:

*I attest that I am reporting using a 2011 Edition CEHRT as I am unable to fully implement 2014 Edition CEHRT because of issues related to CEHRT availability delays. I understand I will be attesting to the meaningful use objectives and associated measures for Stage 1 that were applicable for the 2013 payment year. I attest that fewer than 50% of my encounters for the EHR reporting period take place in locations with fully implemented 2014 Edition CEHRT.*

*For Eligible Professionals who practice in multiple locations: if over 50% of the EP's patient encounters during the EHR reporting period occur at locations equipped with 2014 Edition CEHRT which has been fully implemented, the EP is not eligible to use the flexibility options in this final rule and must attest to 2014 objectives and measures, and must limit their denominators to only those patient encounters in locations equipped with fully implemented 2014 Edition CEHRT.*

The system displays both a cancel and log out function and a save and continue function.

- If cancel is selected, the user is logged out and no attestation record is created.
- Save and continue is not active until the provider has checked the attestation statement.
- When save and continue is selected, the system displays a confirmation message for the provider:

*Confirmation - Please read carefully!*

*You have chosen to attest using:*

*CEHRT Edition / Stage / Year*

*When you select the Continue button below, your attestation will be created with the correct set of Meaningful Use Objectives and Measures as defined in the Final Rule pertaining to 2014 attestations. If you determine later that you have selected the incorrect CEHRT Edition, Stage or Year on the previous page, you will need to contact the SLR Help Desk to request that your attestation be deleted so that you can start over and make another selection.*

*By selecting "Continue", you indicate your understanding of this information.*

The confirmation message displays both a cancel function and a continue function.

- If cancel is selected, the user is redirected to the CEHRT selection page.
- If continue is selected, an attestation record is created using the 2013 Stage 1 objectives and measures, including CQMs.

### **2.1.1.2 2011/2014 Combined CEHRT Entered**

If the EP enters a 2011/2014 Combined CEHRT ID, the system displays a single attestation statement:

*I attest that I am reporting using a combination of 2011 Edition CEHRT and 2014 Edition CEHRT as I am unable to fully implement 2014 Edition CEHRT because of issues related to CEHRT availability delays. I understand that I may choose to attest to either the meaningful use*



*objectives and associated measures for Stage 1 that were applicable for the 2013 payment year, the 2014 Stage 1 objectives and measures or the Stage 2 objectives and measures if I am eligible for Stage 2. I attest that fewer than 50% of my encounters for the EHR reporting period take place in locations with fully implemented 2014 Edition CEHRT.*

*For Eligible Professionals who practice in multiple locations: if over 50% of the EP's patient encounters during the EHR reporting period occur at locations equipped with 2014 Edition CEHRT which has been fully implemented, the EP is not eligible to use the flexibility options in this final rule and must attest to 2014 objectives and measures, and must limit their denominators to only those patient encounters in locations equipped with fully implemented 2014 Edition CEHRT.*

When the attestation statement is selected, the system displays 2 additional selection options:

- Stage 1 (first 2 years of meaningful use)
  - *If Stage 1 is selected, the system displays two additional selection options:*
- Stage 2 (third and fourth years of meaningful use)

If Stage 1 is selected, the system displays two additional selection options:

- I want to attest to the 2013 Stage 1 objectives and measures
- I want to attest to the 2014 Stage 1 objectives and measures

The system displays both a cancel and log out function and a save and continue function.

- If cancel is selected, the user is logged out and no attestation record is created.
- Save and continue is not active until one of the following conditions is met:
  - *The attestation statement is checked and Stage 2 is checked.*
  - *The attestation statement is checked, Stage 1 is checked and 2013 is checked.*
  - *The attestation statement is checked, Stage 1 is checked and 2014 is checked.*
- When save and continue is selected, the system displays a confirmation message for the provider:

*Confirmation - Please read carefully!*

*You have chosen to attest using:*

*CEHRT Edition / Stage / Year*

*When you select the Continue button below, your attestation will be created with the correct set of Meaningful Use Objectives and Measures as defined in the Final Rule pertaining to 2014 attestations. If you determine later that you have selected the incorrect CEHRT Edition, Stage or Year on the previous page, you will need to contact the SLR Help Desk to request that your attestation be deleted so that you can start over and make another selection.*

*By selecting "Continue", you indicate your understanding of this information.*

The confirmation message displays both a cancel function and a continue function.

- If cancel is selected, the user is redirected to the CEHRT selection page.
- If continue is selected, an attestation record is created using the selected combination of Stage and Year options as follows:



- Stage 1 + 2013 creates attestation for 2013 Stage 1 objectives and 2013 CQMs
- Stage 1 + 2014 creates attestation for 2014 Stage 1 objectives and 2014 CQMs
- Stage 2 creates attestation for 2014 Stage 2 objectives and 2014 CQMs

### **2.1.1.3 2014 Combined CEHRT Entered**

If the EP enters a 2014 Combined CEHRT ID, the system displays three attestation statements:

- Statement 1

*I attest that I am reporting using 2014 Edition CEHRT and am unable to fully implement 2014 Edition CEHRT because of issues related to CEHRT availability delays. I understand that I may choose to attest to either the meaningful use objectives and associated measures for Stage 1 that are applicable for the 2014 payment year or the Stage 2 objectives and measures if I am eligible for Stage 2. I attest that fewer than 50% of my encounters for the EHR reporting period take place in locations with fully implemented 2014 Edition CEHRT.*

*For Eligible Professionals who practice in multiple locations: if over 50% of the EP's patient encounters during the EHR reporting period occur at locations equipped with 2014 Edition CEHRT which has been fully implemented, the EP is not eligible to use the flexibility options in this final rule and must attest to 2014 objectives and measures, and must limit their denominators to only those patient encounters in locations equipped with fully implemented 2014 Edition CEHRT.*

*Providers who do not meet the threshold for the Stage 2 summary of care measure because the recipients of the transitions or referrals were impacted by issues related to 2014 Edition CEHRT availability delays and therefore could not implement the functionality required to receive the electronic summary of care document should select the option to attest to Stage 1 2014 objectives and measures.*

- Statement 2

*I attest that I am reporting using 2014 Edition CEHRT and have fully implemented the technology. I will attest to Meaningful Use.*

- Statement 3

*I attest that I am reporting using 2014 Edition CEHRT and will attest to Adopt, Implement or Upgrade (AIU).*

- When attestation statement 1 is selected, the system displays 2 additional selection options:
  - Stage 1 (first 2 years of meaningful use)
  - Stage 2 (third and fourth years of meaningful use)
- When attestation statement 2 is selected, the save and continue function is enabled.
- When attestation statement 3 is selected, the save and continue function is enabled.
- The system displays both a cancel and log out function and a save and continue function.
  - If cancel is selected, the user is redirected to the CEHRT selection page.
  - Save and continue is not active until one of the following conditions is met:



- *Attestation statement 1 is checked and Stage 1 is checked.*
- *Attestation statement 1 is checked and Stage 2 is checked.*
- *Attestation statement 2 is checked.*
- *Attestation statement 3 is checked.*
- When save and continue is selected, the system displays a confirmation message for the provider:

*Confirmation - Please read carefully!*

*You have chosen to attest using:*

*CEHRT Edition / Stage / Year*

*When you select the Continue button below, your attestation will be created with the correct set of Meaningful Use Objectives and Measures as defined in the Final Rule pertaining to 2014 attestations. If you determine later that you have selected the incorrect CEHRT Edition, Stage or Year on the previous page, you will need to contact the SLR Help Desk to request that your attestation be deleted so that you can start over and make another selection.*

*By selecting "Continue", you indicate your understanding of this information.*

- The confirmation message displays both a cancel function and a continue function.
  - If cancel is selected, the user is logged out and no attestation record is created.
  - If continue is selected, an attestation record is created using the selected combination of Stage and Year options as follows:
    - *Statement 1 + Stage 1 creates attestation for 2014 Stage 1 objectives and 2014 CQMs*
    - *Statement 1 + Stage 2 creates attestation for 2014 Stage 2 objectives and 2014 CQMs*
    - *Statement 2 creates attestation for 2014 based on stage provider should be attesting to based on previous attestations*
    - *Statement 3 creates AIU attestation for 2014*

#### **2.1.1.4 Invalid CEHRT ID Entered**

If the EP enters a number that does not match the format of the EHR Certification ID, the system displays the following error message:

*You have entered a number that does not match the EHR Certification ID format from the ONC CHPL. Please check the number you are entering to ensure it is correct.*

No attestation record is created and the provider may not continue until a valid number has been entered.

#### **2.1.2 Changes to EHR Certification Page**

The EHR is displayed and providers are required to confirm that is the correct ID. If it is not, the provider may change the number. Upon save, the system validates that the ID entered matches the criteria for the attestation created at login (i.e. the provider can't enter a 2011 CEHRT edition number at login and get a 2013 attestation, then change to a 2014 CEHRT edition number).



- If a valid ID is entered that matches the attestation that has been created, the provider is allowed to continue on to the objectives and measures.
- If an invalid ID is entered that does not match the CEHRT edition initially specified, the system displays the following error and the provider is not allowed to continue:

*The EHR Certification ID you entered does not match the CEHRT Edition you specified when you started your attestation. You must enter an EHR Certification ID that reflects the correct CEHRT Edition (2011, 2011/2014 combination, or 2014) to proceed. Please enter a valid EHR Certification ID.*

### **2.1.3 Changes to EHR Reporting Period Page**

The system displays a check box to allow providers to indicate if they are reporting CQMs for a different reporting period than the core and menu objectives.

- If selected, the system displays fields for the start date and end date for the CQM reporting period.

## **2.2 Changes to Medicaid Only EH Workflow**

### **2.2.1 Changes at Login/Attestation Creation**

At login for PY2014, the Eligible Hospital (EH) is presented with a page where the EHR Certification ID is entered. Once the ID is entered, the EH is presented with a set of attestation options based on the CEHRT edition associated with the ID entered. Validation is done as follows:

- If characters 3-5 of the number entered are 14E, the system displays options for 2014 CEHRT
- If characters 3-5 of the number entered are H13, the system displays options for 2011/2014 combined CEHRT
- If characters 3-5 of the number entered are any combination OTHER than 14E or H13, the system shall display 2011 CEHRT options.

#### **2.2.1.1 2011 CEHRT Entered**

If the EH enters a 2011 CEHRT ID, the system displays a single attestation statement:

*I attest that I am reporting using a 2011 Edition CEHRT as I am unable to fully implement 2014 Edition CEHRT because of issues related to CEHRT availability delays. I understand I will be attesting to the meaningful use objectives and associated measures for Stage 1 that were applicable for the 2013 payment year.*

The system displays both a cancel and log out function and a save and continue function.

- If cancel is selected, the user is logged out and no attestation record is created.
- Save and continue is not active until the provider has checked the attestation statement.
- When save and continue is selected, the system displays a confirmation message for the provider:

*Confirmation - Please read carefully!*

*You have chosen to attest using:*





### *CEHRT Edition / Stage / Year*

*When you select the Continue button below, your attestation will be created with the correct set of Meaningful Use Objectives and Measures as defined in the Final Rule pertaining to 2014 attestations. If you determine later that you have selected the incorrect CEHRT Edition, Stage or Year on the previous page, you will need to contact the SLR Help Desk to request that your attestation be deleted so that you can start over and make another selection.*

*By selecting "Continue", you indicate your understanding of this information.*

The confirmation message displays both a cancel function and a continue function.

- If cancel is selected, the user is redirected to the CEHRT selection page.
- If continue is selected, an attestation record is created using the 2013 Stage 1 objectives and measures, including CQMs.

#### **2.2.1.2 2011/2014 Combined CEHRT Entered**

If the EH enters a 2011/2014 Combined CEHRT ID, the system displays a single attestation statement:

*I attest that I am reporting using a combination of 2011 Edition CEHRT and 2014 Edition CEHRT as I am unable to fully implement 2014 Edition CEHRT because of issues related to CEHRT availability delays. I understand that I may choose to attest to either the meaningful use objectives and associated measures for Stage 1 that were applicable for the 2013 payment year, the 2014 Stage 1 objectives and measures or the Stage 2 objectives and measures if I am eligible for Stage 2.*

When the attestation statement is selected, the system displays 2 additional selection options:

- Stage 1 (first 2 years of meaningful use)
  - *If Stage 1 is selected, the system displays two additional selection options:*
- Stage 2 (third and fourth years of meaningful use)

If Stage 1 is selected, the system displays two additional selection options:

- I want to attest to the 2013 Stage 1 objectives and measures
- I want to attest to the 2014 Stage 1 objectives and measures

The system displays both a cancel and log out function and a save and continue function.

- If cancel is selected, the user is logged out and no attestation record is created.
- Save and continue is not active until one of the following conditions is met:
  - *The attestation statement is checked and Stage 2 is checked.*
  - *The attestation statement is checked, Stage 1 is checked and 2013 is checked.*
  - *The attestation statement is checked, Stage 1 is checked and 2014 is checked.*
- When save and continue is selected, the system displays a confirmation message for the provider:

*Confirmation - Please read carefully!*

*You have chosen to attest using:*



*CEHRT Edition / Stage / Year*

*When you select the Continue button below, your attestation will be created with the correct set of Meaningful Use Objectives and Measures as defined in the Final Rule pertaining to 2014 attestations. If you determine later that you have selected the incorrect CEHRT Edition, Stage or Year on the previous page, you will need to contact the SLR Help Desk to request that your attestation be deleted so that you can start over and make another selection.*

*By selecting "Continue", you indicate your understanding of this information.*

The confirmation message displays both a cancel function and a continue function.

- If cancel is selected, the user is redirected to the CEHRT selection page.
- If continue is selected, an attestation record is created using the selected combination of Stage and Year options as follows:
  - *Stage 1 + 2013 creates attestation for 2013 Stage 1 objectives and 2013 CQMs*
  - *Stage 1 + 2014 creates attestation for 2014 Stage 1 objectives and 2014 CQMs*
  - *Stage 2 creates attestation for 2014 Stage 2 objectives and 2014 CQMs*

### **2.2.1.3 2014 CEHRT Entered**

If the EH enters a 2014 Combined CEHRT ID, the system displays three attestation statements:

- Statement 1

*I attest that I am reporting using 2014 Edition CEHRT and am unable to fully implement 2014 Edition CEHRT because of issues related to CEHRT availability delays. I understand that I may choose to attest to either the meaningful use objectives and associated measures for Stage 1 that are applicable for the 2014 payment year or the Stage 2 objectives and measures if I am eligible for Stage 2.*

*Providers who do not meet the threshold for the Stage 2 summary of care measure because the recipients of the transitions or referrals were impacted by issues related to 2014 Edition CEHRT availability delays and therefore could not implement the functionality required to receive the electronic summary of care document should select the option to attest to Stage 1 2014 objectives and measures.*

- Statement 2

*I attest that I am reporting using 2014 Edition CEHRT and have fully implemented the technology. I will attest to Meaningful Use.*

- Statement 3

*I attest that I am reporting using 2014 Edition CEHRT and will attest to Adopt, Implement or Upgrade (AIU).*

When attestation statement 1 is selected, the system displays 2 additional selection options:

- Stage 1 (first 2 years of meaningful use)
- Stage 2 (third and fourth years of meaningful use)

When attestation statement 2 is selected, the save and continue function is enabled.



When attestation statement 3 is selected, the save and continue function is enabled.

The system displays both a cancel and log out function and a save and continue function.

- If cancel is selected, the user is logged out and no attestation record is created.
- Save and continue is not active until one of the following conditions is met:
  - *Attestation statement 1 is checked and Stage 1 is checked.*
  - *Attestation statement 1 is checked and Stage 2 is checked.*
  - *Attestation statement 2 is checked.*
  - *Attestation statement 3 is checked.*
- When save and continue is selected, the system displays a confirmation message for the provider:

*Confirmation - Please read carefully!*

*You have chosen to attest using:*

*CEHRT Edition / Stage / Year*

*When you select the Continue button below, your attestation will be created with the correct set of Meaningful Use Objectives and Measures as defined in the Final Rule pertaining to 2014 attestations. If you determine later that you have selected the incorrect CEHRT Edition, Stage or Year on the previous page, you will need to contact the SLR Help Desk to request that your attestation be deleted so that you can start over and make another selection.*

*By selecting "Continue", you indicate your understanding of this information.*

The confirmation message displays both a cancel function and a continue function.

- If cancel is selected, the user is redirected to the CEHRT selection page.
- If continue is selected, an attestation record is created using the selected combination of Stage and Year options as follows:
  - *Statement 1 + Stage 1 creates attestation for 2014 Stage 1 objectives and 2014 CQMs*
  - *Statement 1 + Stage 2 creates attestation for 2014 Stage 2 objectives and 2014 CQMs*
  - *Statement 2 creates attestation for 2014 based on stage provider should be attesting to based on previous attestations*
  - *Statement 3 creates AIU attestation for 2014*

#### **2.2.1.4 Invalid CEHRT ID Entered**

If the EH enters a number that does not match the format of the EHR Certification ID, the system displays the following error message:

*You have entered a number that does not match the EHR Certification ID format from the ONC CHPL. Please check the number you are entering to ensure it is correct.*

No attestation record is created and the provider may not continue until a valid number has been entered.

#### **2.2.2 Changes to EHR Certification Page**



The EHR is displayed and providers are required to confirm that is the correct ID. If it is not, the provider may change the number. Upon save, the system validates that the ID entered matches the criteria for the attestation created at login (i.e. the provider can't enter a 2011 CEHRT edition number at login and get a 2013 attestation, then change to a 2014 CEHRT edition number).

- If a valid ID is entered that matches the attestation that has been created, the provider is allowed to continue on to the objectives and measures.
- If an invalid ID is entered that does not match the CEHRT edition initially specified, the system displays the following error and the provider is not allowed to continue:

*The EHR Certification ID you entered does not match the CEHRT Edition you specified when you started your attestation. You must enter an EHR Certification ID that reflects the correct CEHRT Edition (2011, 2011/2014 combination, or 2014) to proceed. Please enter a valid EHR Certification ID.*

### **2.3 Changes to Dually Eligible EH Workflow**

There are no changes to the workflow for dually eligible hospitals in this release.

### **2.4 Changes to Group Workflow**

The ability for a group administrator to enter a single EHR Certification ID to be inherited by all providers in the group will be temporarily disabled for 2014.

The system may be modified to reflect that an attestation record is not created for the provider immediately on adding them to the group to ensure the correct attestation type must be selected for each EP.

## **3 PROGRAM CHANGES RELATED TO FLEXIBILITY RULE**

### **3.1 Extension of Grace Period**

Due to the new Flexibility Rule Alaska will not be able to implement all the necessary system changes to our State Level Registry until December 31, 2014. As a result of this delay Alaska will be extending the grace period 123 days for EHs and 90 days for EPs.

The Program Year 2014 Grace Period for EHs will be January 31, 2015. The Program Year 2014 Grace Period for EPs will be March 31, 2015.

The grace period will revert to 60 days as outlined in Alaska's approved SMHP for Program Year 2015 going forward.

### **3.2 Program Changes to EHR Certification Page**

State Level Registry will be modified to require the EP/EH to upload documentation that shows providers inability to fully implement a 2014 Certified Edition.

### **3.3 Program Changes to Pre-Payment Validation Steps**

Alaska will adjust the pre-payment validation steps when an EP or EH who has not fully implemented 2014 Edition CEHRT demonstrates 2013 Stage 1 objectives and 2013 CQMs with 2011 Edition CEHRT or a combination of 2011 and 2014 Edition CEHRT by reviewing and



assuring the reason for attesting is appropriate and within CMS's listed criteria, identifying and verifying the CEHRT is correct, and they are correctly reporting 2013 Stage 1 core and menu objectives along with 2013 CQM's. We will refer to our job aids used in prior year attestations to assure these attestations are submitted correctly.

Alaska will adjust the pre-payment validation steps when an EP or EH who has not fully implemented 2014 Edition CEHRT demonstrates 2014 Stage 1 objectives and 2014 CQMs with 2014 Edition CEHRT or a combination of 2011 and 2014 Edition CEHRT by reviewing and assuring the reason for attesting is appropriate and within CMS's listed criteria, identifying and verifying the CEHRT is correct, and they are correctly reporting 2014 Stage 1 core and menu objectives along with 2014 CQM's. We will refer to our job aids used in prior year attestations to assure these attestations are submitted correctly.

Alaska will adjust the pre-payment validation steps when an EP or EH who has not fully implemented 2014 Edition CEHRT demonstrates 2014 Stage 2 objectives and 2014 CQMs with 2014 Edition CEHRT or a combination of 2011 and 2014 Edition CEHRT by reviewing and assuring the reason for attesting is appropriate and within CMS's listed criteria, identifying and verifying the CEHRT is correct, and they are correctly reporting 2014 Stage 2 core and menu objectives along with 2014 CQM's. We will refer to our job aids used in prior year attestations to assure these attestations are submitted correctly.

#### **4 AUDIT STRATEGY CHANGES RELATED TO FLEXIBILITY RULE**

Alaska will be updating the audit strategy to incorporate the flexibility options into the post payment criteria of the strategy. Alaska will submit its revised audit strategy to CMS separate from this SMHP Addendum.