

Memorandum

DATE: September 15, 2016

TO: Medicare and Medicaid Electronic Health Record (EHR) Incentive Program participants.

FROM: Tennessee Department of Health Meaningful Use Coordinator

Introduction

Any provider attesting to receive an Electronic Health Record (EHR) incentive payment for either the Medicare or Medicaid EHR Incentive Program could be subjected to a pre-payment audit or post-payment audit. In order to be prepared for a potential audit, eligible professionals (EPs), eligible hospitals (EHs) and critical access hospitals (CAHs) should retain ALL relevant supporting documentation (in either paper or electronic format) that supports the attestation. The Centers for Medicare & Medicaid Services (CMS) suggests that providers maintain documentation to support attestation for meaningful use objectives for a period of six years post-attestation. (See the [EHR Incentive Programs in 2015 through 2017 Supporting Documentation for Audits](#).)

The Tennessee Department of Health (TDH) recognizes the tremendous opportunities to improve acquisition of surveillance data, immunization data and cancer cases reported to the Department when public health agencies use and report Meaningful Use public health measures. Therefore, a system is in place to facilitate documentation of provider progress along meaningful use milestones.

Trading Partner Registration (TPR) System

The Tennessee Department of Health's (TDH) Trading Partner Registration (TPR) System is used by trading partners who exchange data electronically with TDH to register their intent to do so, and includes tracking of meaningful use milestones. Once the registration has been submitted, the TDH programs responsible for on-boarding each interface review submitted registrations and determine the status of each. Registrations may be approved or denied for each TDH interface for which the potential trading partner has registered. Once approved, trading partners can use the TPR System to monitor their entity's progress through on-boarding processes for each interface.

The Tennessee Department of Health can provide the following items when requested:

1. Milestone Letters
 - a. Milestone letters are emailed to registered users associated with the provider entity each time a milestone letter is generated for an interface for which the provider is registered.
 - b. The Milestones tab within the TPR system lists each milestone a provider must complete as well as dates those milestones were completed. This section can be printed and saved as proof of active engagement.
2. Requests for Actions
 - a. In accordance with the final rule for modified stage 2 and stage 3, providers must respond to requests from the Public Health Agency (PHA).
 - b. The TPR system has the capability of documenting the request, the date of the request and the disposition date of the request.
 - c. This information may be used to demonstrate Active Engagement: Option 2 – Testing and Validation.
3. Interface Details
 - a. This tab allows TDH staff to document a provider's status as being either In Queue, Testing, On-boarding or In Production.

Memorandum

Legacy Registrations and Other Documents

Legacy information or registrations may not be available because some legacy systems may have been retired or the data contained in the older system may not have been converted to information in TPR. If the information is available, TDH staff will attempt to retrieve the information if a request is made by a provider or designated representative.

Recommendations

1. All providers should register their intent to exchange data in the [TPR system](#). In TPR both the process and the progress of a provider are documented in the milestones tab.
2. Providers should maintain copies of all registration emails received. TPR can send a registration milestone letter and store the letter as a downloadable pdf file on the provider profile inside TPR.
3. Providers may use acknowledgement messages from the Tennessee Immunization Information System (TennIIS) as proof of active engagement. (Providers should consult with their EHR vendors for more information).
4. Providers should save all request for action emails from TDH staff.
5. Providers may use the Interface Details tab to print current versions of the provider status.
6. Please contact appropriate program staff (see contact information below) for more options.

Examples of suggested documentation not found in the TPR system:

Meaningful Measure	Audit Validation	Suggested Documentation
Electronic Lab Reporting (ELR) Syndromic Surveillance Messaging Immunization Registry Submission Cancer Case Reporting	Active engagement with a public health agency to submit electronic data from certified EHR technology for the EHR reporting period.	<ul style="list-style-type: none"> • Dated screenshots from the EHR system that document successful submission to the registry or public health agency. • A dated record of successful electronic transmission (e.g., screenshot from another system, or acknowledgement message(s), etc.). Should include evidence to support that it was generated for that provider (e.g., identified by National Provider Identifier (NPI), CMS Certification Number (CCN), provider name, practice name, etc.).
Exclusions	Documentation to support each exclusion to a measure claimed by the provider.	<ul style="list-style-type: none"> • For exclusions to public health reporting objectives, a letter, email, or screenshot from the registry that demonstrates the provider was unable to submit and would therefore qualify under one of the provided exclusions to the objective.

Additional documentation, such as system factsheets are available <http://tn.gov/health/topic/meaningful-use-summary#moreinfo>.

Memorandum

Public Health Measure Options –

Electronic Laboratory Reporting (ELR) – If the question is specifically related to ELR, email CEDS.Informatics@tn.gov.

Syndromic Surveillance Messaging – If the question is specifically related to Syndromic Surveillance for Hospitals with an ER, email CEDS.Informatics@tn.gov.

Immunization Registry Reporting – If the question is specifically related to Immunization Registry Reporting, email TennIIS.MU@tn.gov. The points of contact will be Nancy Williams or Sarah Rudd.

Cancer Case Reporting – If the question is specifically related to Cancer Case Reporting, email TNCancer.Registry@tn.gov.

For additional questions regarding MU Public health reporting, visit: <http://www.tn.gov/health/topic/meaningful-use-summary> or contact the TDH Meaningful Use Coordinator at MU.Health@tn.gov.

CMS Audit Documentation

Audits and Appeals - https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Appeals_Audits.html

EHR Incentive Programs Audits Overview - https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Downloads/AppealsAudits_EHRAuditsOverview-.pdf

Supporting Documentation for Audits - https://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Downloads/AppealsAudits_2015through2017SupportDoc.pdf

For additional questions regarding MU Public health reporting or to learn more, please contact the TDH Meaningful Use Coordinator at (615) 253-8945 or email MU.Health@tn.gov.