Health IT Update

• 1099 & Electronic Health Record (EHR) Payments
• EHR Payments
• EHR Audits
Individual EP Payments & 1099

- AHCCCS started making EHR Payments to Eligible Professionals in 2012
- Eligible Professionals for Medicaid EHR Program:
  - MD/DO (includes Pediatricians)
  - Nurse Practitioners
  - Certified Nurse Midwives
  - Dentists
  - Physician Assistants - only those who “lead” FQHCS
- Total available for ongoing program participation is $63,750, which is distributed in six annual payments
- Almost all 1st payments were for $21,250 for Adopt Implement or Upgrade (AIU)
- Next five payments = $8,500 each
What options do providers have?

- Each EP can either receive the funds and be the **payee** (monetary recipient) of EHR Incentive payment or **reassign** the payment to their practice or entity in which they have a legal, contractual relationship.
  - If an Eligible Provider (EP) is reassigning a payment to his/her practice, the EP is personally required to attest that he/she is aware of the payment reassignment and that the reassignment falls within the guidelines issued by the IRS.
- The State would issue a 1099 to whomever receives the payment.
1099 Problem for 2012 Payments

• For EHR payments made in 2012, AHCCCS first issued 1099s to the payee (individual EP or assignee -whoever received the payment) in January 2013
• AHCCCS was corrected by CMS and had to reissue 1099s to the EP, regardless of whether or not they had reassigned the payment, in August 2013
• Formal IRS guidance allowing AHCCCS to issue 1099s to the payee was not received until January 2014;
• Beginning with 2013 payments, AHCCCS has sent all 1099s to the payee
Current 1099 Resources

• On AHCCCS EHR News & Updates section the IRS has published an Informational Letter [PDF] related to Form 1099 reporting

• [http://www.azahcccs.gov/EHR/about/EHRNews.aspx](http://www.azahcccs.gov/EHR/about/EHRNews.aspx)

Reaching across Arizona to provide comprehensive quality health care for those in need
National EHR Program Update

As of November 2014

Reaching across Arizona to provide comprehensive quality health care for those in need
Total CMS Payments to EPs and EHs through November 2014

- More than $17.3 billion in Medicare EHR Incentive Program payments have been made between May 2011 and November 2014.

- More than $8.8 billion in Medicaid EHR Incentive Program payments have been made between January 2011 and November 2014.

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### AZ EHR Incentive Payment Totals*

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medicaid EP Payments</td>
<td>$66,763,265</td>
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<tr>
<td>Medicare EP Payments</td>
<td>$110,413,817</td>
</tr>
<tr>
<td><strong>Total AZ EP Payments</strong></td>
<td><strong>$177,177,082</strong></td>
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<tr>
<td>Dually Eligible EH Payments</td>
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<tr>
<td>Medicare EH Payments</td>
<td>$1,050,695</td>
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<tr>
<td>Medicaid Only EH Payments</td>
<td>$8,959,532</td>
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<tr>
<td><strong>Total Dually Eligible EH Payments</strong></td>
<td><strong>$284,886,449</strong></td>
</tr>
</tbody>
</table>

**TOTAL AZ EHR Program Payments**: $472,073,759

**Total AZ EH Payments**: $294,896,675

* January 2011 – November 2014

* Reaching across Arizona to provide comprehensive quality health care for those in need.
Arizona Payments to IHS and Tribal Hospitals

- Ten Hospitals registered with EHR Incentive Program
  - 8 have received at least one year of payment since opening in 2011
  - 2 were just approved for payment (Parker and San Carlos)
- Total for all AHCCCS payments to IHS/638 hospitals is $13,571,976* as of Dec. 2014
## IHS/638 Eligible Hospital Summary

<table>
<thead>
<tr>
<th>CCN</th>
<th>Organization Name (DBA)</th>
<th>CMS</th>
<th>AHCCCS</th>
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<tr>
<td></td>
<td></td>
<td>Register</td>
<td>Register</td>
</tr>
<tr>
<td>30078</td>
<td>DHEW IND HLTH SV HLTH SVS &amp; MNTL (Phoenix Indian Medical Center)</td>
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<tr>
<td>30077</td>
<td>DHHS PHS IHS PHOENIX AREA (San Carlos Indian Hospital)</td>
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<tr>
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<td>DHHS PHS IHS PHOENIX AREA (Whiteriver Indian Hospital)</td>
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<td>31305</td>
<td>DHHS PHS IHS PHOENIX AREA (Hopi Health Care Center)</td>
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<td>31307</td>
<td>DHHS PHS IHS PHOENIX AREA (Parker Indian Hospital)</td>
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<td>30074</td>
<td>DHHS PHS IHS TUCSON AREA IHS TUCSON SELLS INDIAN HOSPITAL (Sells Indian Hospital)</td>
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<tr>
<td>30084</td>
<td>DHHS PHS NAIRS CHINLE COMPREHENSIVE HEALTH CARE FACILITY (Chinle Comprehensive Health Care Facility)</td>
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<tr>
<td>31308</td>
<td>Gila River Health Care Corporation (Hu Hu Kam Memorial Hospital)</td>
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<td>30071</td>
<td>The Fort Defiance Indian Hospital Board, Incorporation (Fort Defiance Indian Hospital)</td>
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<td>30073</td>
<td>TUBA CITY REGIONAL HEALTH CARE CORPORATION (Tuba City Indian Medical Center)</td>
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</tbody>
</table>

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AHCCCS Payments for IHS/638 EPS

- Currently Total number of unique EPS that have received an AHCCCS Payment = 2,853
- 457 IHS/638 EPS have received a payment
- Total = $9,035,500
- Currently AHCCCS is open for Stage 1 and Stage 2
- Not yet approved to open for providers that want to use non 2014 CEHRT software (flexibility rule)
EH Post Payment Audits

- Hospital audits are led by CMS for Medicare/Medicaid EHR Incentive Payment audits (excluding Medicaid patient volume)
  - Patient Volume audits are conducted by AHCCCS
- AHCCCS conducts pre- and post-payment audits on an ongoing basis
- HHS/Office of Inspector General performing payment audits
  - AHCCCS is not notified of audit initiations or findings