

IMPORTANT DEADLINES APPROACHING RAPIDLY

With Thanksgiving just around the corner, don't forget that November 30 is an important date in the EHR Incentive Program for eligible hospitals (EHs) and critical access hospitals (CAHs).

EH Attestation Deadline: Nov. 30, 2014

This fall, CMS released the *2014 Flexibility Rule* to assist EHs in attesting to MU. This Rule allows EHs to demonstrate MU in FY/CY 2014 with a variety of 2014 CEHRT*:

1. Use 2011 CEHRT to meet 2013 Stage 1 performance measures and CQMs;
2. Use a combination of 2011 and 2014 CEHRT to meet either 2013 Stage 1 performance measures and CQMs or 2014 Stage 1 performance measures and CQMs; or
3. Use 2014 CEHRT to meet either 2014 Stage 1 or Stage 2 performance measures or CQMs.

*Note that to A/I/U in 2014, users are only allowed to adopt, implement, or upgrade to 2014 CEHRT.

To receive a Medicare incentive payment for FY 2014, **EHs and CAHs must successfully attest to demonstrating MU by 11:59 p.m. ET on November 30, 2014.** (EHs participating in the Medicaid EHR Incentive Program need to refer to their [state deadlines](#) for attestation.) The CMS Attestation System is now fully operational; go to <https://ehrincentives.cms.gov/hitech/login.action> to begin the attestation process for the 2014 FY.

2015 Hardship Exception Deadline: Nov. 30, 2014

Medicare-eligible EPs and EHs must attest to demonstrating MU **every year** to receive an incentive and avoid a payment adjustment. EPs and EHs who failed to demonstrate MU in 2013 will be subject to these adjustments in FY/CY 2015.

However, Medicare EPs and EHs who participated in the Medicare or Medicaid EHR Incentive Program **for the first time** in 2014 may apply for a vendor hardship exception to avoid this **2015** payment adjustment. The original application deadlines—April 1, 2014, for EHs and July 1, 2014 for EPs/EHs—have been extended to **11:59 p.m. EST on November 30, 2014.**

EPs and EHs that have never met MU may apply during this reopened submission period only if they meet both of the following conditions:

- EHs were unable to attest by July 1, 2014/EPs were unable to attest by October 1, 2014; **AND**
- They were unable to fully implement 2014 Edition CEHRT due to delays in 2014 Edition CEHRT availability.

Visit http://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/PaymentAdj_Hardship.html to complete the application.

2016 Payment Adjustments

Medicare EPs, EHs and CAHs must attest to demonstrating MU **every year** to receive an incentive and to avoid a payment adjustment. For example, Medicare EPs and EHs that fail to demonstrate MU for the FY/CY 2014 will be subject to a payment adjustment in 2016. These adjustments will be applied at the beginning of FY/CY 2016. CAHs payment adjustments are based on year of participation, see below link for more details.

Go to http://www.cms.gov/Regulations-and-Guidance/Legislation/EHRIncentivePrograms/Downloads/PaymentAdj_HardshipExcepTipsheetforHospitals.pdf for more information.

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The National Meaningful Use Team wishes everyone a safe and happy Thanksgiving!