

District of Columbia's Medicaid Promoting Interoperability PROGRAM YEAR 2021 ATTESTATION CHECKLIST

Eligible Providers (EP) who participate in the Promoting Interoperability (PI) Program are required to submit supporting documentation to validate all attested measures and determine eligibility for the program. Per Title 29 DCMR Chapter 89, all supporting documentation used during the attestation must be retained for at **least 10 years**. Documents are submitted via [DC's State Level Registry \(https://dcslr.thinkhts.com/\)](https://dcslr.thinkhts.com/).

If you have questions about supporting documentation, please contact the Department of Health Care Finance Health IT Team at DCLSR@dc.gov.

Required Documentation

- EP Workbook** – Comprehensive report required for each attestation validating the provider and/or group's eligibility for the PI program. Each EP must provide their own workbook.
 - EP Workbook template can be found under "Helpful Links" on the [DHCF Medicaid EHR Incentive Program website \(https://dhcf.dc.gov/page/medicaid-electronic-health-record-ehr-incentive-program\)](https://dhcf.dc.gov/page/medicaid-electronic-health-record-ehr-incentive-program)*
- Summary Level Patient Volume Report** - Report validating the patient volume data entered during the attestation which includes a summary of patient volume and a detailed report of the patient encounter. Patient encounter documentation should contain the information listed below for all encounters during the selected reporting period (90-day patient volume reporting period during the calendar year prior to the program year or 12 months prior to attestation):
 - Provider name
 - Provider NPI or a unique identification number
 - Encounter ID or Medicaid ID (Highly encouraged but optional)
 - Date of service
 - Place of service
 - Payment status (paid or not paid)
 - Payer name (Blue Cross Blue Shield, Medical Assistance, Priority Partners, etc.)
 - Payer type (Medicaid, private, Medicare, self-pay, etc.)
 - Please note:** *Patient Protected Health Information (PHI) must be masked, blurred, or removed prior to submission. DHCF will ask an EP to resubmit an application if it contains PHI.*
- Dashboard Report for PI Objectives and Clinical Quality Measures (CQMs)** - Report from the certified EHR system validating all objective and measure data entered during the attestation. Detailed documentation should include the numerator, denominator, and exclusion for each measure, the reporting period and/ or program year the report covers, and evidence to support that it was generated for the EP. All PI measures and CQMs must be present on this dashboard ("zero" numerators and denominators are acceptable to meet the CQM program requirement but need to be included in this report).

- **Please note:** All EHRs should electronically record the numerator and denominator and generate a report that includes the numerator, denominator, and percentage.

- **Certified Electronic Health Record Technology (CEHRT) Vendor Letter** - A dated and signed formal letter from the vendor illustrating the EHR system[s] has the necessary technological capability, functionality, and security to meet the program requirements. Letter must contain the provider or practice name, the name and version of the EHR system[s], CEHRT ID and/ or CMS product number, and the date 2015 CEHRT was acquired or updated. Vendor letter must include verification of each modular system, which must contain the provider or practice name and the name and version of the modular system[s].

- **Please note:** Letter must be a formal letter distributed by the vendor themselves. Letters from sales company, certifying bodies, or other unrelated agencies would not meet the requirement for this piece of documentation.

- **Public Health Registry Letter** - A dated and signed letter from a public health agency or clinical health registry describing the certified EHR system's capacity to submit data electronically. The letter shall include the agency indicating the engaged registry, the dates of active engagement (must occur prior to or within the program year), and the option of active engagement.

- **Please note:** Refer to the DC Public Health Declaration of Readiness document found under "Helpful Links" on the [DHCF Medicaid EHR Incentive Program website](https://dhcf.dc.gov/page/medicaid-electronic-health-record-ehr-incentive-program) (<https://dhcf.dc.gov/page/medicaid-electronic-health-record-ehr-incentive-program>)

- **Clinical Decision Support - Objective 2: Drug/Drug functionality** - The following documentation will be accepted as proof that the functionality was available, enabled, and active in the system during the attestation reporting period.

- **Screenshot(s):** One or more screenshots from the certified EHR system attesting the functionality was available, enabled, and active in the system during the attestation reporting period. Screenshots from the EHR must be dated during the EHR reporting period selected for attestation. Screenshot should illustrate drug formulary functionality from the certified EHR system; **OR**
- **CEHRT Audit Logs:** An audit log from the certified EHR system attesting the functionality was available, enabled, and active in the system during the attestation reporting period. The logs must be time stamped showing when the functionality was enabled; **OR**
- **Vendor Letter:** A letter written on the vendor's letterhead and signed by the vendor and practice and/or provider's medical director confirming relevance to the EP and the functionality is available, enabled, and active in EHR system. The letter must include the enabled dates of the functionality and the confirmation it cannot be turned off. The letter can also include a list of all EPs using the functionality.

- **Clinical Decision Support - Objective 4: Drug formulary functionality** – The following documentation will be accepted as proof that the functionality was available, enabled, and active in the system during the attestation reporting period.
 - **Screenshot(s):** One or more screenshots from the certified EHR system attesting the functionality was available, enabled, and active in the system during the attestation reporting period. Screenshots from the EHR must be dated during the EHR reporting period selected for attestation. Screenshot should illustrate drug formulary functionality from the certified EHR system; **OR**
 - **CEHRT Audit Logs:** An audit log from the certified EHR system attesting the functionality was available, enabled, and active in the system during the attestation reporting period. The logs must be time stamped showing when the functionality was enabled; **OR**
 - **Vendor Letter:** A letter written on the vendor’s letterhead and signed by the vendor and practice and/or provider’s medical director confirming relevance to the EP and the functionality is available, enabled, and active in EHR system. The letter must include the enabled dates of the functionality and the confirmation it cannot be turned off. The letter can also include a list of all EPs using the functionality.

- **Security Risk Analysis Summary** - The following documentation will be accepted as proof that a security risk analysis was completed within the program year:
 - **A Letter or Memo:** The letter or memo must be a dated and signed from the organization’s practice administrator attesting that a security risk analysis was completed the within the program year. The letter must indicate the name and version of the EHR system(s) evaluated, dates when the evaluation was conducted, a summary of the results of the risk assessments, and evidence it was generated for the provider or practice’s EHR system (s) (e.g. National Provider Identifier (NPI), provider name, practice name, etc.); **OR**
 - **An SRA Report:** A generated report from [ONC’s Security Risk Assessment Tool](https://www.healthit.gov/topic/privacy-security-and-hipaa/security-risk-assessment-tool) (<https://www.healthit.gov/topic/privacy-security-and-hipaa/security-risk-assessment-tool>) or another risk assessment tool that illustrates the evaluated criteria and the results. The report must be completed within the program year. The report must also indicate the name and version of the EHR system(s) evaluated, the date when the evaluation was conducted, a summary of the results of the risk assessments, and evidence it was generated for the provider or practice’s EHR system (s) (e.g. National Provider Identifier (NPI), provider name, practice name, etc.).
- **Please note:** Providers are required to submit a Security Risk Analysis during Calendar Year 2021. If the SRA has not been completed by the date of attestation, the EP is required to indicate their intent to submit the SRA in the state level repository. The deadline to submit the SRA is **January 31, 2022**. For more information, please contact DCLSLR@dc.gov.

Optional Documentation

- **Federally Qualified Health Center (FQHC) Letter (IF APPLICABLE)** - A formal dated and signed letter or statement from CMS or another public health governing entity (e.g. HHS) that identifies the clinical practice as an FQHC/RHC.