



STATE OF MARYLAND
DHMH

Maryland Department of Health and Mental Hygiene

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Martin O'Malley, Governor – Anthony G. Brown, Lt. Governor – Joshua M. Sharfstein, M.D., Secretary

Subject: Reassignment of EHR Incentive Payments

Date: June 10, 2014

How does an eligible provider (EP) reassign the incentive payment to a valid TIN?

Providers participating in the Electronic Health Record (EHR) Incentive Program are “permitted to reassign their incentive payments to their employer or to an entity with which they have a contractual arrangement allowing the employer or entity to bill and receive payment for the EP’s [Eligible Professional] covered professional services.” 42 C.F.R. §495.10(f).

Maryland Medicaid providers may reassign their incentive payment to a Tax Identification Number (TIN) associated with an employer or entity with which they are affiliated with in the Medicaid Management and Information System (MMIS). The MMIS is Maryland Medicaid’s system of record for provider enrollment and claims processing. All provider and employer relationships established in MMIS during Medicaid provider enrollment are valid pay-to entities that an attesting provider may select in Maryland’s EHR Registration and Attestation System, eMIPP.

The Provider Agreement signed by all Medicaid providers states that providers are responsible for updating their information with Medicaid, including their current group affiliations.

To prevent EHR incentive payments to unauthorized pay-to entities, Maryland Medicaid uses three layers of protection:

1. Federal level enumeration and identity management systems;
2. Maryland’s eMedicaid web service system; and
3. Group affiliation status in MMIS.

At the federal level, health care providers maintain their National Provider Identification (NPI) numbers with the National Plan & Provider Enumeration System (NPES). Providers create and maintain federal user accounts with the Centers for Medicare and Medicaid Services (CMS) Identity and Access Management System (I&A).

Providers use their I&A account information to log into and register their intent to participate with Medicaid in CMS’s EHR Incentive Program Registration and Attestation System. This is the first step in participating in the EHR Incentive Program. This process results in a unique Registration Number.

Next, Medicaid providers access Maryland's Registration and Attestation System, eMIPP, using their Maryland Medicaid web-services account created in eMedicaid. Providers must then enter a Registration Number obtained from CMS that corresponds with the provider's user profile in eMedicaid.

Providers can authorize a representative to complete the CMS registration on their behalf through the I&A system and through eMedicaid. It is the responsibility of the provider to know who is attesting for them and to prevent unauthorized use of their NPPES and individual eMedicaid accounts.

Finally, depending on how the provider enrolled with Maryland as a Medicaid provider, the provider will be able to direct their incentive payment to a valid TIN.

Because the creation of user names and passwords requires provider-specific information, it is the provider's responsibility to decide who should receive this information. The Department is not responsible for and will not be involved in any dispute of incentive payment assignment between individual providers and their affiliated groups.

Providers who do not want a group to attest for them should consider doing the following:

- Clarify the expectations with the employer about EHR Incentive disbursement.
- Keep NPPES usernames and passwords private.
- Do not authorize representatives to access NPPES accounts through the I&A system.
- Do not share individual eMedicaid usernames and passwords.
- Providers should notify Provider Enrollment when they are no longer members of a group, and request that their relationship be deactivated.