

MEANINGFUL USE FOR FQHCs

Frequently Asked Questions

1. How does an Eligible Provider (EP) re-assign their payments to an FQHC?

- a. The National Association of Community Health Centers published an issue brief in October 2010 which detailed the process for EPs to assign their incentive payments to an FQHC and suggests appropriate contract language for FQHCs to use in their provider agreements to ensure that FQHCs receive the benefit of the incentive payments.

Please click the following link to access the issue brief:

<http://www.nachc.com/client/documents/10.10%20EHR%20Incentive%20Contracting%20Issue%20Brief%20-%20FINAL1.pdf>

2. Are Physician Assistants eligible for the MU Incentive Program?

- a. Yes – provided the FQHC or RHC is Physician Assistant (PA) **led** and meet all other criteria for eligible professionals. According to CMS, PA led means:
 - i. When a PA is the primary provider in the clinic (for example, when there is a part-time physician and full-time PA, CMS would consider the PA as the primary provider)
 - ii. When a PA is a clinical or medical director at the clinical site of practice
 - iii. When a PA is an owner of a RHC

3. What if I have one site in my FQHC that is PA led and the others are led by physicians. Can all of the PAs throughout my FQHC and thus multiple sites be eligible?

- a. If any PAs work at an FQHC network that is PA-led, or even just one clinical location that is PA-led, then they (and the PA who is doing the leading) qualify for the Medicaid EHR Incentive Program (assuming that they have the patient volume, do AIU, etc). CMS leaves it up to the State to be as expansive as possible to bring in the PAs, hence them not defining whether it can be the whole network or just one clinic.

4. My provider re-assigned his/her payment to my FQHC. To whom does the tax liability fall?

- a. If an EP re-assigns it to the FQHC, the FQHC then pays the tax. In other words, it is the tax identification number (TIN) who receives the funds.