

# CTAP Policy and Procedure Guidance

The information provided below is intended to clarify program requirements delineated in the Notice of Funding Opportunity (NFO) for the California Technical Assistance Program (CTAP). This information will be updated as needed, and each section labeled as “new” or “revised” on a specific date for tracking purposes.

## **1. Technical Assistance Agreements/Acknowledgments**

- A.** Because CTAP reimbursement is based on the attainment of milestones by individual eligible professionals (EPs), signed Eligible Professional Technical Assistance Acknowledgments (EPTAA<sup>1</sup>) must be received for every professional for whom the CTAP contractor claims payment. The CTAP contractor may receive payment for the technical assistance agreement/acknowledgment, HIE and specialist milestones until May 31, 2018 by initially submitting a Practice Representative Technical Assistance Agreement (PRTAA) that is signed by a practice representative and lists the names of EPs that are practice members. A PRTAA may be used after May 31, 2018, but will not be sufficient for receiving initial payment for the technical assistance agreement/acknowledgment, HIE and specialist milestones. An EP’s signature of a CTAP section in an AIU or MU attestation submitted to the SLR will be considered equivalent to submission of a signed EPTAA form. The CTAP section of the AIU or MU attestation does not have to be generated by the SLR, as long as it is signed, dated and has the exact same language as that generated by the SLR. OHIT will send a list of EPs that have signed the CTAP section in AIU or MU attestations to CTAP contractors approximately weekly.
- B.** If the CTAP contractor does not submit a signed EPTAA or a signed CTAP section in an AIU or MU attestation for EPs listed on a PRTAA by a mutually agreed date (MAD) between the CTAP contractor and the OHIT, the CTAP contractor will be required to refund all CTAP payments received for that EP. The MAD will be individualized for each CTAP contractor and will occur on or after May 31, 2018. Refunded payments will not count toward the maximum amount of funds the CTAP contractor can receive during the term of the CTAP program and can be replaced by satisfying requirements for CTAP payments for other EPs.
- C.** Practices can add professionals to PRTAAs by submitting a signed PRTAA Addendum. OHIT must receive the PRTAA Addendum prior to or along with the contractor’s submission of a MDR for these additional EPs.

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<sup>1</sup> Unless otherwise specified, EPTAA refers to EPTAA-Individual or EPTAA-Group

- D. To qualify for payments for an EP's AIU or MU milestones, a CTAP section in an AIU or MU attestation or EPTAA must be signed by the EP prior to or on the date that the EP submits an attestation for AIU or MU.
- E. A signed EPTAA or a CTAP section in an AIU or MU attestation is required to be submitted prior to or along with a MDR for the AIU, MU, and Solo milestones. After May 31, 2018, this requirement also applies to the technical assistance agreement/acknowledgment, HIE and specialist milestones
- F. Beginning with Program Year 2017, CTAP contractors cannot receive payments for technical Assistance Agreements/Acknowledgments, solo, specialist, or HIE milestones for providers that have not received EHR incentive payments in a prior year from the Medi-Cal or other state Medicaid EHR incentive program. These providers are not considered eligible professionals in the Medi-Cal EHR Incentive Program and thus are not considered eligible to received technical assistance services.

(Revised 8-5-19)

## **2. Specialists**

- A. For the purposes of the CTAP program, specialists are defined as physicians who are certified or board-eligible for a specialty or subspecialty recognized by the American Board of Medical Specialties or the American Osteopathic Association. Physicians with specialties in family medicine, internal medicine, pediatrics, and obstetrics and gynecology are not considered specialists unless they are also certified in a subspecialty. Dentists and optometrists are also considered specialists for the purposes of the CTAP program.
- B. CTAP payments for specialists who are physicians require that the CTAP contractor has submitted a copy of documentation of board certification or board eligibility. This can be a screen print from the American Board of Medical Specialties website ([www.certificationmatters.org](http://www.certificationmatters.org)), a screen print from an individual specialty board website, or a copy of a diploma or certification or similar documents. A health plan provider directory can also be used for documentation if the health plan certifies that the specialty or subspecialty status of listed providers has been verified as part of its official credentialing process. Information from the NPPES website is not sufficient for specialty certification documentation. A signed EPTAA or completion of Step 2 in the SLR is not required for submission of an invoice for CTAP specialist payments.
- C. CTAP specialist payments for optometrists and dentists do not require submission of additional documentation.

- D. The CTAP contractor may receive a specialist or solo practitioner payment for an EP, but not both.

(Revised 9-27-17)

### **3. Solo Practitioners**

- A. For the purposes of the CTAP program, a solo practitioner must practice 50% or more of their time in a location at which they are the only professional of any of the following types: physician, nurse practitioner, dentist, certified nurse midwife, optometrist, or physician assistant.
- B. For solo practitioner payments, CTAP contractors must submit a MDR and an electronic copy of a signed EPTAA (EPTAA-Individual only) on which the EP has initialed that they are a solo practitioner. Completion of Step 2 in the SLR is not required.
- C. The CTAP contractor may receive a specialist or solo practitioner payment for an EP, but not both.

(Revised 6-13-16)

### **4. Health Information Exchange**

- A. To be eligible for an HIE payment the TA contractor must assure that the EP or the EP's practice group has a contract/agreement with an HIE that is a signatory of the CalDURSA and is a participant in good standing with CTEN. The HIE contract/agreement must have been signed on the same day or after the EPTAA or the PRTAA or PRTAA Addendum was signed unless the EP or practice group has an existing HIE agreement and the HIE subsequently becomes a CalDURSA signatory and an active CTEN participant in good standing.
- B. EPs who individually or with their practice group have an agreement with an HIE that is not a CalDURSA signatory and/or CTEN participant will not be countable toward the payment until the HIE signs the CalDURSA and is an active CTEN participant in good standing. A new HIE agreement will not be required in this instance.
- C. EPs who join a practice group that has already signed a qualified HIE contract will not be countable toward the HIE payment to the TA contractor.
- D. An EP who changes practice settings and (after signing an EPTAA or being listed on a PRTAA or PRTAA Addendum) the new practice setting gains new access to a qualifying HIE, is countable toward the TA payment regardless of his/her previous experience with HIEs.

- E. An EP changing HIEs (but not practice setting) are not countable for the TA payment if his/her previous HIE was a CalDURSA signatory and CTEN participant.
- F. An electronic copy of the practice's or EPs HIE agreement must be submitted for each EP. The complete agreement does not have to be submitted, but the documentation must include:
  - 1) The letterhead of the HIE organization.
  - 2) Effective date—the date when the practice signed an HIE agreement or the HIE became a CTEN participant— whichever is later.
  - 3) The name of the HIE organization and the name of the practice and/or the individual EP.
  - 4) Because of prior policy, if the EP's name was not on a practice's HIE agreement signed before February 8, 2016 and the practice has not submitted a PRTAA with the EP's name—a signed letter from the practice verifying that the EP is an active member of the practice may be submitted. Beginning February 8, 2016 all EPs must have been listed on a PRTAA or PRTAA Addendum or have signed an EPTAA prior to the effective date of the HIE agreement.
  - 5) Signature with date.
  - 6) Optional: A screen shot of the CAHIE webpage at <http://www.ca-hie.org/projects/cten/participants> which documents that the HIE is a CTEN participant in good standing on the date of the MDR submission. OHIT staff are able to view the website to confirm that a HIE has been a CTEN participant after a specific date, but if the HIE ceased being a CTEN participant after the date of the invoicing and prior to OHIT review, OHIT staff will need a screen shot taken on the day of invoice submission for verification purposes. For this reason, it is recommended that CTAP contractors submit such a screenshot.

(Revised 6-13-16)

## **5. 2014 Flexibility Rule**

- A. For the purposes of CTAP payments, an EP who used the Flexibility Rule in 2014 to attest to Stage 1 meaningful use rather than their first year of Stage 2, will be considered to be attesting to a new meaningful use stage when they first attest to Stage 2 in a subsequent program year.

(New 11-20-15)

## **6. Payments**

- A.** The number of EPs for which the CTAP contractor was awarded funding serves as the maximum number of payments a CTAP contractor may receive for each milestone (except for all MU milestones), regardless of how many individual EPs receive CTAP services. Every EP receiving CTAP services must complete an EPTAA regardless of whether the CTAP contractor has exceeded the maximum number of contract milestone payments for which payment can be received.
  
- B.** If a CTAP-enrolled professional changes locations, another CTAP contractor can newly enroll the professional and receive enrollment, solo, specialist, and HIE milestone payments for the professional if eligibility requirements for the milestones are satisfied. Only the CTAP contractor providing TA services at the time of attestation for AIU and MU, can receive payments for achievement of AIU or MU milestones.

(Revised 9-27-17)

## **7. Invoicing**

### **A. General Invoice Information**

- 1) MDRs shall be submitted no later than sixty (60) days after the milestone achievement occurred, except in the case of the solo and specialist milestones.
  
- 2) OHIT will review MDRs and respond to the appropriate contractor within three (3) business days (excluding State Holidays).
  
- 3) Once a MDR has been approved by OHIT, additional charges on the final invoice for payment will not be allowed. Additional charges must be submitted in future invoices.
  
- 4) If a final invoice is received with any discrepancies, it will be denied and returned to the appropriate Contractor.

### **B. Invoicing for AIU or MU**

- 1) CTAP contractors will employ the Steps Report to ascertain which EPs may be submitted for AIU or MU milestone payments. In the Steps Report column entitled 'Step', only the following statuses will satisfy the requirement for AIU or MU invoicing: Submission Approved; Duplicate Payment Check (D16) Submitted; Duplicate Payment Check (D16) Sent; CMS Approved (D-16); Invoice Generated; Invoice Printed; Incentive Payment (D18) Submitted, Payment Complete. In the case of temporary suspension of an EP or their PI Program payee, DHCS may (on a case

by case basis) pay milestone invoices for an EP's attestation if it was submitted before the effective date of the temporary suspension and would be approvable were the temporary suspension not in effect.

- 2) OHIT staff will provide expedited review of AIU or MU applications for which an EPTAA, PRTAA or PRTAA Addendum has been submitted to OHIT. However, if an EP's application is determined to be deficient, it will be reassigned and processed in accordance with normal processing guidelines for the Medi-Cal EHR Incentive Program. The CTAP contractor will be notified of this action such that they can assist the EP in remediating said deficiencies in a timely manner.
- 3) In order to invoice for a Program Year 2020 provider milestone the provider must have completed and saved Step 3 in the SLR and must have uploaded MU documentation by September 30, 2020.
- 4) For Program Years 2019 and 2020, preliminary invoices must be submitted by November 30, 2020 and final invoices must be submitted by December 14, 2020. Invoices will not be accepted unless the attestation is in a processing step designated in Section 1 above.

(Revised 6-16-20)

### **C. Process for Submitting Milestone and Invoice Documentation**

- 1) All documents, except final invoices, must be submitted to OHIT by email to: [EHR\\_TA@dhcs.ca.gov](mailto:EHR_TA@dhcs.ca.gov)
- 2) Final invoices (including MDR and Summary Statement) must be submitted to OHIT by US Mail to:

**Department of Health Care Services  
Contract Manager: Errin Horstkorta  
1700 K Street-Mail Station Code 0004  
P.O. Box 997413  
Sacramento, CA 95899-7413\*\***

**\*\*If submitting an invoice by courier (i.e. UPS, Fed Ex, etc.) please use the following address:**

**Department of Health Care Services  
Contract Manager Errin Horstkorta  
1501 Capitol Avenue  
P.O. Box 997413  
Mail Station Code 0004  
Sacramento, CA 95899-7413**

3) Final invoices **must** include the following required information:

- a) Date
- b) Contract Number
- c) The Contractor's name as shown in the contract.
- d) The billing and/or performance period covered by the invoice.
- e) Summary Statement-must include an original signature in blue ink (an electronic signature is **not** acceptable per the State Controller's Office).
- f) Approved MDR

(New: 12-11-15)

## **8. Signature Requirement**

- A.** The PRTAA, PRTAA Addendum, EPTAA or CTAP section in an AIU or MU attestation must be manually signed by the practice representative or EP, as appropriate. Also, all final invoices must be manually signed in blue ink by the CTAP organization. All other signatures on documents do not have to be manually signed, and can be mechanically or electronically signed.

(Revised 6-13-16)

## **9. Overlap of CTAP and Regional Extension Center (REC) Enrollees**

- A.** If a CTAP contractor submits an invoice for a CTAP payment for an EP and subsequently submits a payment request for that EP with the REC program, OHIT will recoup all CTAP payments made to the CTAP contractor for that EP.
- B.** If a CTAP contractor received a REC Program Milestone 3 payment for an EP by using the M-3 tool instead of attesting to meaningful use in the SLR, the CTAP contractor will not be eligible for a CTAP payment for subsequently attesting to AIU or first year stage 1 MU in the SLR for the EP. However, the CTAP contractor will be eligible for CTAP milestone payments if the EP attests to meaningful use for subsequent years and stages.

(Revised 6-13-16)

## **10. CTAP Drop/Offset/Recoupment Process**

The following offset guidelines and process shall be used by CTAP contractors when becoming aware of eligible professionals (EPs) for whom they will **not** obtain signed EPTAA's or CTAP sections in an AIU or MU attestation by the MAD.

### **A. EP Drop/Offset Invoice Guidelines**

- 1) Services delivered to the enrolled EPs must be billed prior to drop. Once an EP is listed as a drop, retroactive billing for services delivered prior to the drop date will not be permitted.
- 2) If an EP is enrolled by a CTAP contractor after being officially dropped by another CTAP contractor, the "new" CTAP contractor will be permitted to invoice for all milestones up to their awarded amount, with the exception of AIU/MU milestone(s) that were previously achieved.
- 3) If an EP is dropped by a CTAP contractor but later re-enrolled as a member of a new practice by the same CTAP contractor, a new EPTAA is not required. The CTAP contractor will not be able to receive duplicate contract, solo or specialist milestone payments for this EP, unless they had



not previously obtained a signed EPTAA for the EP and had offset these payments. AIU and MU milestones previously achieved cannot be billed.

## **B. Milestone Payment Offsets**

- 1) If the CTAP contractor is unable to secure a signed EPTAA or a CTAP section in an AIU or MU attestation from a contracted EP by the MAD, the CTAP contractor is not eligible to retain paid milestone payments for that EP. In order to facilitate repayment, the OHIT will allow CTAP contractors to offset these milestone payments prior to the MAD, against new invoiced milestones. In order to do this, CTAP contractors shall:
  - a) CTAP contractors may offset milestone payments by submitting a preliminary MDR.
  - b) Paid milestones for EPs dropped shall be included in the invoice as negative amounts.
  - c) All new billable milestones and offset milestones on the preliminary MDR must total a positive amount or zero payable amount.
  - d) DHCS Accounting will not accept a net negative total amount.
  - e) The date of the approved preliminary MDR will be the effective date of the EP status change.
  - f) To ensure prompt reimbursement, contractors are encouraged to review the preliminary MDR for accuracy.

## **C. Recoupments**

- 1) CTAP contractors will be invoiced for any paid milestones attributable to contracted professionals for whom OHIT has not received a signed EPTAA or a CTAP section in an AIU or MU attestation form by close of business of the MAD.
  - a) Several months prior to the MAD, the OHIT shall identify and prepare a list of all EPs for whom a signed EPTAA has not been received. The list shall exclude EPs whom have been dropped and whose milestone payments have been offset or for whom the contractor has reimbursed the Department.
  - b) This list shall be shared with the appropriate CTAP contractors, advising that signed EPTAAs have not been received for listed EPs.
  - c) The list shall include the EP name, NPI, and organization NPI along with milestones, which have been paid.
  - d) CTAP contractors shall be instructed to review and confirm the accuracy of the lists, and provide required copies of signed EPTAAs where a discrepancy is identified. CTAP contractors will also be

encouraged to secure signed EPTAAs from remaining EPs prior to the MAD.

- e) This list will be generated and distributed monthly until the MAD has passed for all CTAP contractors.
  - f) The OHIT will accept outstanding signed EPTAAs or signed CTAP sections in an AIU or MU attestation no later than the MAD for each CTAP contractor.
- 2) Soon after the MAD, OHIT staff shall prepare a final list of all EPs for whom a signed EPTAA or a signed CTAP section in an AIU or MU attestation has not been received. The list shall include EP names, NPIs, and milestones paid. CTAP contractors will receive a copy of this list along with a draft invoice; identifying paid milestones, which shall be recouped due to failure to submit signed EPTAAs or CTAP sections in AIU or MU attestations.
- a) CTAP contractors shall have 30 calendar days from the date of the draft invoice, to confirm the accuracy of the list and invoice amount.
  - b) In the instance of a dispute, the CTAP contractor, within the same 30 days, shall:
    - i. Present to the OHIT in writing, a notice of dispute
    - ii. Include a detailed summary of disputed adjustments
    - iii. Include for consideration, valid documentation supporting disputed adjustments, such as evidence that signed EPTAA agreements were submitted to OHIT no later than the MAD for each CTAP contractor.
  - c) The OHIT shall review and consider the CTAP contractor's supporting documentation.
  - d) The OHIT shall prepare and provide a schedule of milestone payment adjustments, and invoice the CTAP contractor accordingly.
- 3) CTAP contractors shall have 45 calendar days from the date of invoice to submit payments.

(Revised 5-31-18)