Overview:
Starting with Program Year 2015 and onwards, in order to provide Medicaid Eligible Providers a means of attesting to Meaningful Use and avoid payment adjustments, for the Program Year(s) in which they cannot meet the Medicaid EHR Incentive program requirements (such as Patient Volume), Medicaid EPs will be able to attest to MU, with the ‘Alternate Medicare Attestation’ through the CMS Registration & Attestation System.

Please note the following about completing an Alternate Medicare Attestation:
- Filing an Alternate Medicare Attestation is not mandatory.
- There is NO incentive payment for successful completion of an Alternate Medicare Attestation.
- A Medicaid EP remains in the Medicaid program and this does not constitute as switching programs.
- Submitting an Alternate Medicare Attestation avoids payment adjustments but it does NOT count as a Medicaid Payment Year (unless they also attest to Medicaid).
- Submitting an Alternate Medicare Attestation with CMS will not prevent an EP from later filing a Medicaid attestation should it be later determined they would have met all of the Medicaid requirements. (Filing deadlines are still in effect)
- A Medicaid EP who submits an Alternate Medicare Attestation is subject to a Medicare Audit. An audit in this circumstance would affect any Medicare Payment Adjustments and not a recoupment of incentive money since submitting an Alternate Medicare Attestation does not result in an incentive payment. If an EP later also submits an attestation with Medicaid for an incentive payment, they would be subject to a Medicaid Audit.
- Submission of an Alternate Medicare Attestation follows Medicare Attestation deadlines.
Steps for Submission:

Providers who have never participated in either the Medicare or the Medicaid program, will first need to follow the steps laid out in the Federal Registration Guide for EPs.

Providers who have previously participated in the EHR Incentive Program will need to log in to the CMS Registration & Attestation System.

Click on the “continue” tab.
Enter your User ID: and Password:
If there is a “Modify” button (in the lower right area of the screen) that may be selected to cross-check/update any registration information prior to selecting the “Register” button in the lower right area of the “Registration Instructions” page to proceed. (Other actions (Cancel, Reactivate, Resubmit, View Status) buttons may also be available). DO NOT switch incentive programs (from Medicaid to Medicare) in order to do the Alternate Medicare Attestation.
Answer the requested information and click “Proceed with Submission”:

Once completed you will need to verify your Registration information and then click “Submit Registration”: 
At this point your registration information will be sent to the State of Michigan. The “Registration”, “Attestation”, and “Status” tabs do not contain current information, and you cannot proceed with submitting any attestation data, until confirmation is sent back to CMS by the State. Confirmation by the State is typically done within a day via a batch process. Wait a day to verify this confirmation has taken place and then continue.

Once the State has confirmed the EP’s registration, the “Registration” and “Status” tabs will now contain updated Medicaid information. Although the “Attestation” tab still does not contain any information for the Program Year of registration, the forms/menus will now be accessible to permit Attestation data submission.
DO NOT switch incentive programs (from Medicaid to Medicare) in order to do the Alternate Medicare Attestation. The Alternate Medicare Attestation is done with your MEDICAID Registration.

Proceed to the Attestation tab to continue:

Click on the “Attest” button for the appropriate Program Year in the lower part of the Attestation tab to continue with the Alternate Medicare Attestation:
Observe the guidance in “red text” at the top of the webpage:

Enter the required information for the EHR Certification Number, and the EHR Reporting Period. Then click “Save & Continue”:
Complete the Meaningful Use Objective. As you proceed through the attestation data entry pages, prompts for the Numerator and Denominator numbers will require manual entry of the numbers.

The “Attestation Statements” page will require the provider to check three boxes in order to proceed. Medicare would like all EPs to know that by checking the third box, it does not evaluate or affect your ability to attest successfully to Medicaid MU with the State of Michigan to obtain a Medicaid Incentive payment for the same program year if later it is determined by the provider that they have met all of the Medicaid requirements and wish to submit a Medicaid registration prior to the deadline. Click “Agree” in order to move forward with your registration.