Medicaid 90/10 Funding Fact Sheet for Immunization Information Systems

The Centers for Medicare and Medicaid Services (CMS) allow state Medicaid agencies to submit funding requests to obtain 90 percent Federal Financial Participation (FFP). Two 90/10 Medicaid funding sources are available to states from CMS: Medicaid Management Information System funding and Health Information Technology for Economic and Clinical Health (HITECH) funding.

The 90 percent HITECH match applies to a specific set of meaningful use requirements for eligible providers required to meet Modified Stage 2 or Stage 3 Meaningful Use (MU). For Modified Stage 2 MU, providers must meet the measure options for Objective 10: Public Health Reporting Objective, such as immunization registry reporting. For Stage 3 MU, Medicaid providers must attest to at least two measures from the Public Health Reporting Objective: Measures 1-5. To meet Stage 3 MU, providers must accomplish bidirectional data exchange with one or more public health specialty registries.

States may submit requests through their state Medicaid agency to obtain 90 percent FFP funds to plan, design, develop, and implement systems that connect health care providers to immunization information systems (IISs).

What are the key components of the 90/10 match program?

- The IIS agency must work with the state Medicaid office to incorporate IIS-related meaningful use activities in the Medicaid Health Information Technology Implementation Advance Planning Document (IAPD).
- The timeline for requesting 90/10 match must align with the timing of the state Medicaid agency’s IAPD submission. Operating periods are parallel with the federal fiscal year. Conversations with the state Medicaid agency should start early, and states should allow plenty of time for completing the process.
- IIS administrators or their parent organizations must have non-federal funding to meet the 10 percent match requirement.
- The starting point for the 90 percent match involves identifying Medicaid’s “fair share” of the cost. The Medicaid fair share is based on the proportion of involved providers who serve Medicaid patients and the population eligible for Medicaid.
- The Medicaid match funding is distributed as reimbursement for expenditures related to implementation of the IIS activities included in the state’s Medicaid IAPD.
- The 90/10 FFP is not available for maintenance and operations after the implementation phase is completed, as agreed upon by the state and CMS.
- The 90/10 HITECH FFP is available through 2021.

How does 90/10 funding relate to immunization information systems?

90/10 funding can be used for interoperability activities related to MU that support onboarding and design, development, and implementation (DDI) of infrastructure. Examples include:
Eligible Onboarding Activities for IIS
- State and vendor staffing for provider onboarding (time-limited)
- Provider education and training on IIS participation
- Onboarding and technical assistance for an Eligible Professional (EP) or Eligible Hospital (EH) to connect to an IIS directly or via Health Information Exchange (HIE)
- Onboarding Medicaid providers, even those who are not MU-eligible, including public health providers, pharmacies, and laboratories, for purposes of exchanging data with EPs and EHs

Design, Development, and Implementation (DDI)
- State and/or vendor staffing for initial infrastructure build
- Updating current HIE and IIS standards to meet bidirectional exchange for Stage 3
- Additional examples of DDI:
  - Provider directory
  - Privacy and security applications
  - Data warehouses
  - Secure messaging
  - Clinical quality measure reporting via the HIE
  - Master client index
  - Encounter alerting

Implementation Advance Planning Document (IAPD) process:
The following sections, as part of a HITECH IAPD table of contents, are related to IIS:
- Section III: Statement of Needs and Objectives
- Section V: Personnel Resource Statement
- Section VI: Proposed Activity Schedule
- Schedule VII: Proposed Budget
- Section VIII: Cost Allocation Plan
- Section IX: Assurances, Security, and Interface Requirements

For more information:
- Planning Toolkit for Preparing to Access CMS 90-10 Funding for Public Health: https://phi.org/medicaid-90-10-toolkit