Certification and Adoption Workgroup – Policy Committee Update on the ONC Standards and Certification NPRM

Marc Probst, workgroup co-chair
Larry Wolf, workgroup co-chair

April 4, 2012

Workgroup Members

Co- Chairs
- Marc Probst, Intermountain Healthcare
- Larry Wolf, Kindred Healthcare

Members
- Joan Ash, Ohio State University
- Carl Dvorak, Epic
- Steve Downs, Robert Wood Johnson Foundation
- Paul Egerman, Entrepreneur
- Joseph Heyman, Whittier IPA
- George Hripcsak, Columbia University
- Liz Johnson, Tenet Healthcare
- Charles Kennedy, Aetna
- Donald Rucker, Siemens
- Latanya Sweeney, Harvard University
- Paul Tang, Palo Alto Medical Foundation
- Micky Tripathi, Massachusetts eHealth Collaborative
- Scott White, SEIU

HHS liaisons
- Martin Rice, HRSA

Review And Comment On ONC NPRM As Relates To Policy

Health Information Technology: Standards, Implementation Specifications, and Certification Criteria for Electronic Health Record Technology, 2014 Edition; Revisions to the Permanent Certification Program for Health Information Technology

- Definition of Certified EHR Technology
- Safety Enhanced Design / User Centered Design
- Clinical Decision Support
- Other Health Care Settings
- Accounting of Disclosures
- Disability Status
- Data Portability
- EHR Technology Price Transparency

Proposed Criteria That Would Require User Centered Design Documentation

- § 170.314(a)(1) CPOE
- § 170.314(a)(2) Drug-drug, drug-allergy interaction checks
- § 170.314(a)(6) Medication list
- § 170.314(a)(7) Medication allergy list
- § 170.314(a)(8) Clinical decision support
- § 170.314(a)(17) Electronic medication administration record
- § 170.314(b)(3) Electronic prescribing
- § 170.314(b)(4) Clinical information reconciliation

Timeline and Work Plan

Workgroup Virtual Meetings

- March 29, 2012, noon-1pm ET
  - Review and Organize Work
- April 9, 2012, 11:30am-1pm
  - Definition of Certified EHR Technology
  - Safety Enhanced Design/User Centered Design
- April 13, 2012, 3:30-5pm
  - Clinical Decision Support
  - Other Health Care Settings
  - Accounting of Disclosures
- April 17, 2012, 1:30-3pm
  - Disability Status
  - Data Portability
  - EHR Technology Price Transparency
- To Be Scheduled
  - Prepare Comments for Presentation to the Policy Committee

Comments to Policy Committee

- May 2, 2012

Initial Discussion: March 29, 2012

For overall context

- National Strategy for Quality Improvement In Health Care
- Federal Health IT Strategic Plan

Questions to help focus on policy aspects

- What is the relative importance of the criteria/standard?
- Is the criteria/standard in use today?
- Does the proposed criteria/standard reduce a barrier to adoption?
- How well does the proposed regulation address the issue?
- Is it the minimum necessary?
- Is it aligned with other initiatives?
- Does it support innovation?
- Does it allow for flexibility for vendors and providers?
- How well does it balance tradeoffs?
- What are the assumptions about technology?
- What is the practicality of the certification criteria and testing procedures?
- Is the proposed criteria/standard sufficiently clear?