

Recommendations to the HIT Policy Committee on ONC Standards and Certification NPRM

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Certification and Adoption Workgroup

Marc Probst, Intermountain Healthcare

Larry Wolf, Kindred Healthcare

Workgroup Members

Co-Chairs

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

Members

- Joan Ash, Ohio State University
- Steve Downs, Robert Wood Johnson Foundation
- Carl Dvorak, Epic
- 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



Focus on *Policy*

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

Focus on *Policy*

- Definition of Certified EHR Technology

- Safety Enhanced Design

Recommendation: ONC add a Voluntary Base EHR certification specification to test integration of Base modules with respect to security, safety, and usability.

- Accounting of Disclosures

Recommendation: ONC add a voluntary Security integration certification specification to test integration of Base, Core, or Menu modules with security module contained in Base EHR.

- EHR Technology Price Transparency

Focus on *Policy*

- Definition of Certified EHR Technology
- Safety Enhanced Design

Recommendation: Require documentation of evidence that user centered design principles were employed throughout product development.

Recommendation: Require use of standard quality criteria for software development captured in documentation.

Comment: Support need for an ability to generate a file for reporting EHR safety events to the PSO. However, care needed to not further complicate UI and workflow.

Focus on *Policy*

- Definition of Certified EHR Technology
- Safety Enhanced Design
- **Clinical Decision Support**

Comment: The change to "Clinical Decision Support Intervention" vs. "rule" is a good one providing a wider, more robust definition that doesn't focus on technical implementation.

Comment: Requiring this relatively early InfoButton standard as the "go to" standard is premature.

Recommendation: Propose requiring a broader certification criteria such as 5 examples of decision support and at least one set of decision support software build tools (rules engine, InfoButton, expert system builder).

Focus on *Policy*

Recommendation: Care Summary Exchange. Reduce the time and cost for ineligible providers to acquire, implement and use HIT to exchange information with other providers using standard-based care summaries (C-CDA) to coordinate care.

- Other Health Care Settings

Recommendation: Voluntary setting of specific criteria. Voluntary certification with ONC criteria and process, especially for modular certification.

- EHR Technology Price Transparency

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Recommendation: There is benefit in keeping the “optional” certification criterion language so long as HHS and OCR have not identified a long-term plan for addressing what the AOD report should entail.

Focus on *Policy*

• Definition of Certified EHR Technology

Comment: Dual emphasis on improving care and tracking disparities of access and outcomes.

• Clinical Decision Support

Recommendation: Include in Stage 3 Meaningful Use, as formal nomenclature and coding are still in preliminary phases.

- Accounting of Disclosures
- **Disability Status**
- Data Portability

Recommendation: Include sexual orientation and gender identity in Stage 3 Meaningful Use.

Focus on *Policy*

Comment: It is not likely that the Consolidated CDA could electronically provide a sufficient amount of a patient's health history, especially for complex, long hospital stays, and probably not for complex patients w/ chronic disease.

Comment: Standards required for items such as; Flow charts, ancillary care (therapists) notes, dietary, ventilator settings, and many other detailed clinical information.

- Data Portability

Comment: Batch export of multiple patient records represents a privacy risk.

Focus on *Policy*

- Definition of Certified EHR Technology

Comment: EHR pricing is complex. There are many factors that affect total cost of ownership (TCO). Although we recognize potential value of EHR price transparency, without a full cost model, pricing information is anything but transparent.

Recommendation: We recommend that ONC does not include this as part of its final rule.

- Data Portability
- EHR Technology Price Transparency

Focus on *Policy*

- Significantly more comment and much work completed by workgroup
- Certification and Adoption Work Group preparing formal comments to ONC