

HIT Standards Committee Implementation Workgroup

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Implementation Workgroup Members

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Prematics, Inc.
Cerner Corporation
Dept. of Defense
Gartner, Inc.
Surescripts
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MA eHealth Collaborative
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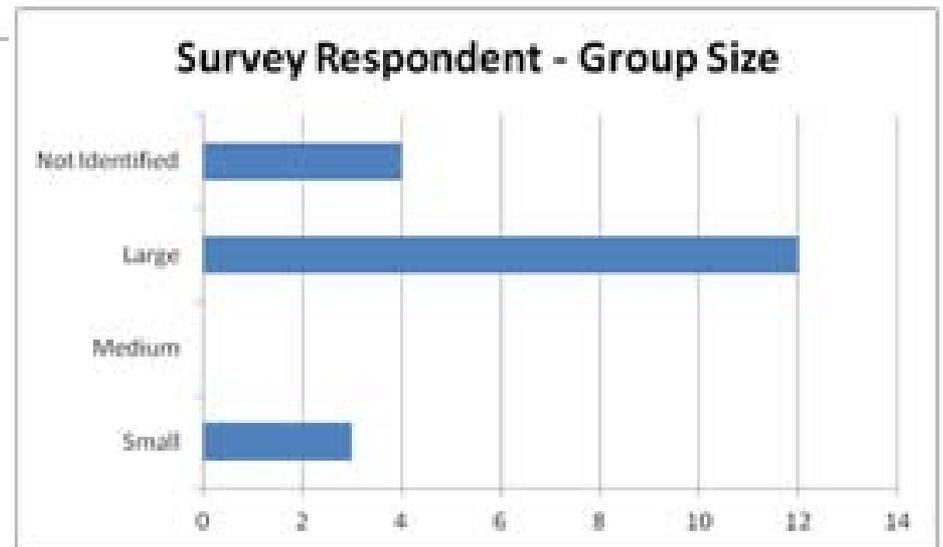
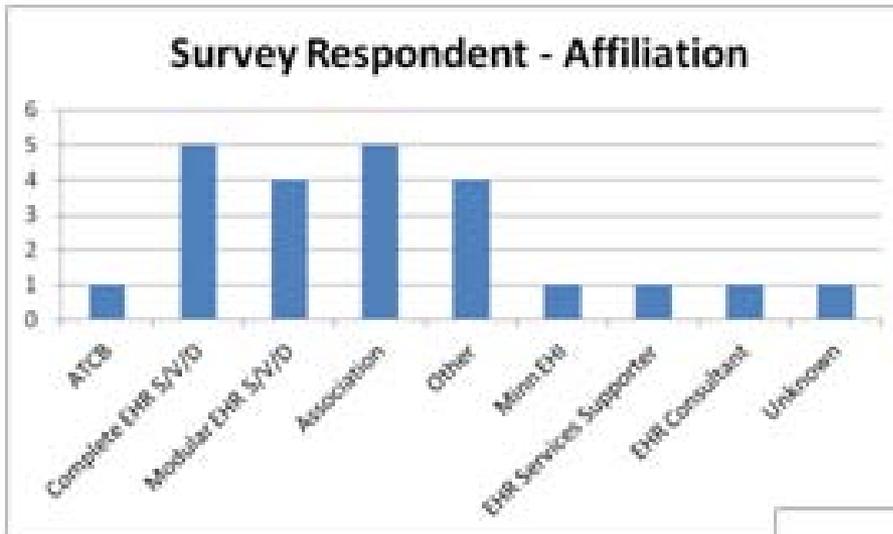
Chief Technology Officer, OSPT

Certification Input: Workplan and Timeline

- Released survey on Monday, May 16th - **DONE**
- Survey comments close on Friday, June 17th - **DONE**
- Compile and summarize survey comments – June 20th to July 15th - **DONE**
- Analyze results and formulate recommendations and report – July 15th to Aug 17th - **DONE**
- Determine if additional data collection is required via hearing - **TBD**
- Present recommendations to HIT Standards Committee on August 17th
 - *Stage 1 (any immediate clarifications needed)* - **TODAY**
 - *Stage 2 (future suggestions)* - **In Progress**
- Dissemination of recommendations in Sept/Oct



Certification Survey - Demographics



Certification Survey - Summary of Findings

Global Comments on what worked:

- ATCBs provided guidance and processes that were helpful
- Choices in testing and certification bodies should continue
- Use of remote testing capabilities was useful
- Consistency of standard NIST testing procedures
- Addition of Modular certification
- Ability to seek 'site' certification
- Distribution of information including ability to access via web, blogs, FAQs



Certification Survey - Summary of Findings

Global suggestions for improvement

- Lack of clear guidance to ATCBs led to inconsistency
- Certification criteria are not clear and lack sufficient details
- Certification criteria did not address clinical specialties/ancillary activities
- FAQs were issued late and not cross referenced
- Modular versus Complete EHR requirements confusing
- Debate over certification criteria focus: What are we looking for?
 - Interdisciplinary Usability
 - Work flow centric (using 'meaningful 'workflows)
 - Alignment of results and outcomes with MU objectives
- No stated plan for certifying new releases of EHRs
- Difficult to discern which products combine to achieve complete EHR (Version Certification numbers)
- Lack of assurance of interoperability between certified products



Certification Survey - Summary of Findings

- Comments on specific criteria
 - *Public Health Surveillance & Reporting*
 - Further clarification of what constitutes a ‘test’
 - Assurance that CAP & CLIA requirements considered
 - *Exchange of information method*
 - Requires specifications/unclear
 - Contextual definitions of “transmit” is inconsistent
 - *CQM requirements*
 - Require specificity around numerator and denominator definitions
 - Need clarification on the level of accuracy required
 - *Vital Signs, BMI & Growth Charts* – Do not apply in all care settings
 - *Summary of Care Record & Providing Electronic Copy*
 - Criteria required less data elements than the MU requirement
 - How should the copy be provided – what is the accepted output format
 - *Security & Privacy*
 - *Combine authentication and access controls – duplicative testing*
 - *Allow security audit log products to test independently*
 - *EHR modular and ‘site certification’ requirements need refinement*



Certification Survey - Summary of Findings

- Test Procedures

- *Process*

- Scripts should require version control and schedule release prior to use
 - Alignment with 'real' clinical workflow and context in care settings
 - Provision of test procedures to vendors prior to testing
 - Deletion of any obsolete drugs or other clinical references

- *Specific Testing Scenarios/Scripts*

- Nine tests for each code related to Smoking Status
 - Need to separate testing for radiology, laboratory and medications
 - Need to combine like processes: med orders, eRx & drug-formulary checks
 - Accuracy of CQM calculations should be clarified
 - Tighten correlation between security risk assessment versus testing scripts
 - Test for accounting of disclosures requires further description.



Certification Recommendations for Stage 2

1. Create a grid that shows the standards, certification criteria, testing methodology, and implementation guidance for each of the Stage 2 MU Measures, including the quality measures.
2. Launch a unified HHS website that serves as the “single source of truth” for CMS’s MU and ONC’s certification programs.
3. Establish a clear process to manage updates to specifications for MU measures and quality measures.
 - Include version numbers and release notes for all updates so users can easily identify the most recent info and clearly understand what has changed since the last update.
 - Indicate whether updates are mandatory or optional.



Certification Recommendations for Stage 2, continued

4. Clarify and simplify requirements for possession and attestation to use of certified EHR technology:
 - Simplify rules for Provider
 - Simplify certification process for vendors and ONC-ATCBs
 - Consider requiring Providers to possess EHR technology certified only against those measures they use for MU
 - List the products included in a certified system by name and indicate the MU measures supported by each named product
 - Give Providers the flexibility to pursue any option:
 - ✓ A single complete certified EHR
 - ✓ An all-modular EHR comprised of certified modules
 - ✓ A complete certified EHR plus certified modules
 - ✓ Pieces of a complete certified EHR plus certified modules



Certification Recommendations for Stage 2, continued

5. Build realistic software development and implementation timelines into regulatory requirements.
 - Align certification requirements with stage of MU.
 - Establish 18-month effective dates for newly adopted certification criteria.
6. Publish the HHS process for conducting MU and Certification compliance audits.
 - Clarify how FAQ's will be used.
 - Identify the type of documentation the Provider will need.
7. Publish the timeline for publication of the MU Stage 2 Measures, as well as for the associated proposed and final regulations and Certification Test methods.



Certification Recommendations for Stage 2, continued

8. Revise individual certification criteria and test procedures based on specific comments.
 - Many specific examples provided.
9. Mixed reaction to creating “scripts” with combined test procedures that permit the vendor to satisfy multiple certification criteria at once.
 - More input and analysis required.
 - Some liked it for certain scenarios, like medication process.
10. Publish more guidance for Providers in order to clarify the difference between the certification criteria and the MU incentive requirements.
 - For example, the privacy and security requirements.



3 Key Action Items – Past, Present, and Future

- Complete analysis of survey results re: certification and generate recommendations [**PAST**]
 - Stage 1 (*any immediate clarifications needed*)
 - Stage 2 (*future suggestions*)
- Work with ONC to create a Stage 2 grid that shows:

MU Objective	Measure	Existing Standard(s)	Certification Criteria	Testing Methodology	Implementation Guidance
1.					
2.					
3.					
4.					

[**PRESENT**]

- Coordinate with NIST re: future Certification Strategy [**FUTURE**]