

# **HIT Standards Committee Implementation Workgroup**

**Liz Johnson, Tenet Healthcare, Co-Chair**

**Judy Murphy, Aurora Health Care, Co-Chair**

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Department of Health & Human Services  
Office of the National Coordinator for  
Health Information Technology

# Implementation Workgroup Members

## Co-Chairs

Liz Johnson  
Judy Murphy

Tenet Healthcare Corporation  
Aurora Health Care

## Members

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Lisa McDermott  
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Centers for Medicare & Medicaid/CMS  
NextGen  
National Institute of Standards & Technology/NIST  
BlueCross BlueShield of South Carolina  
Kaiser Permanente  
Golden Living, LLC  
Markle Foundation  
Iowa HIT Regional Extension Center  
Whittier IPA  
Prematics, Inc.  
Cerner Corporation  
Emory University  
Dept. of Defense  
Texas Health & Human Services  
Gartner, Inc.  
Surescripts  
RelayHealth  
Cerner  
MA eHealth Collaborative

## Ex Officio

Aneesh Chopra

Chief Technology Officer, OSPT



# Recommendations for Certification Process

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



# Recommendations for Certification Process

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



# Recommendations for Certification Process

5. Build realistic software development and implementation timelines into regulatory requirements.
  - Align certification requirements with stage of MU.
  - Establish effective dates at least 18 months following publication of NPRM for new 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.



# Recommendations for Certification Process

8. Revise individual certification criteria and test procedures based on specific comments.
9. Create “scripts” with combined test procedures that permit the vendor to satisfy multiple certification criteria at once.
  - More input and analysis required
  - May be more appropriate for certain scenarios
10. Publish more guidance for providers in order to clarify the difference between the Certification Criteria and the Meaningful Use incentives requirements.
11. Identify pre-defined bundles of certification criteria and standards representing key EHR elements that make up a complete EHR, and reflect the way providers think about health IT.



# Testing Input: The Scope of Work for the Workgroup

1. Continue the population of the 'Grid' to include Test Procedures (TPs)
2. Provide the perspective of the provider and vendor/developer on the expected changes in TPs related to Stage 2 MU
3. Consider the implications of transitioning from TPs that currently use visual inspection testing and attestations to formalized testing for product certifications.
4. Present formal timeline of activities and description deliverables at December HITSC meeting.

