



Meeting Notes

Health Information Technology Advisory Committee Conditions and Maintenance of Certification Requirements Task Force March 11, 2019, 9:00 a.m. – 10:30 a.m. ET Virtual

The March 11, 2019, meeting of the Conditions and Maintenance of Certification Requirements Task Force (CMCTF) of the Health IT Advisory Committee (HITAC) was called to order at 9:00 a.m. ET by Lauren Richie, Designated Federal Officer, Office of the National Coordinator for Health IT (ONC).

Lauren Richie conducted roll call.

Roll Call

Raj Ratwani, Co-Chair, MedStar Health

Denise Webb, Co-Chair, Individual

Carolyn Petersen, Member, Individual

Sasha TerMaat, Member, Epic

John Travis, Member, Cerner

MEMBERS NOT IN ATTENDANCE

Kensaku Kawamoto, Member, University of Utah Health

Leslie Lenert, Member, Medical University of South Carolina

ONC STAFF

Stephanie Fiore, ONC

Cassandra Hadley, HITAC Back Up/Support

Christopher Monk, ONC SME

Lauren Richie, Branch Chief, Coordination, Designated Federal Officer

Kate Tipping, ONC Conditions of Maintenance of Certification Requirements Task Force Lead

Review of Charge

Kate Tipping, ONC reviewed the charge with the CMCTF.

- **Overarching Charge:** Provide recommendations on the “application programming interface (API),” “real world testing,” and “attestations” conditions and maintenance of certification requirements; updates to most 2015 Edition health IT certification criteria; changes to the ONC Health IT Certification Program; and deregulatory actions.
- **Specific Charge:** Provide recommendations on the following:
 - “API,” “real world testing,” and “attestations” conditions and maintenance of certification requirements



- Updates to the 2015 Edition certification criteria: “Standardized API for patient and population services,” “electronic health information export,” “electronic prescribing,” “clinical quality measures – export,” and privacy and security-related attestation criteria (“encrypt authentication credentials” and “multi-factor authentication”)
- Modifications to the ONC Health IT Certification Program (Program)
- Deregulatory actions related to certification criteria and Program requirements

Denise Webb shared that today’s discussion will focus on application programming interfaces and principles of proper conduct for accrediting bodies.

Application Programming Interfaces (APIs)

- ONC proposes to adopt a new API criterion in § 170.315(g) (10), which would replace the “application access – data category request” certification criterion (§ 170.315(g)(8)) and become part of the 2015 Edition Base EHR definition. This new certification criterion would require the use of Health Level 7 (HL7®) Fast Healthcare Interoperability Resources (FHIR®) standards and several implementation specifications.
- Supports two types of API-enabled services:
 - Services for which a single patient’s data is the focus
 - Services for which multiple patients’ data are the focus

Fast Healthcare Interoperability Release (FHIR) Release Options

- **John Travis** commented that FHIR release 4 is preferred. He noted that it preferred that vendors be on the same standard.
- **Sasha TerMaat** noted that it is more worthwhile and puts vendors in a better position to begin working toward FHIR release 4, rather than maintaining codes to support various releases of the standard.
- **John Travis** noted that vendors prefer to be on a more progressive standard.
- **Denise Webb** asked if anyone can speak to the impact for one versus another on the provider side.
 - **Sasha TerMaat** shared that there wouldn’t be an implementation difference between the two standards.
- **Carolyn Petersen** questioned who would be left behind if developers had to move from release 2 to release 4.
 - **Denise Webb** commented that ONC should not stymie the industry if vendors are not encouraged to work toward a more current standard.
 - **Raj Ratwani** noted that small to mid-sized developers may not have the resources to move from release 2 to release 4.
- While the CMC TF recommends option 4, there was concern about the impact this would have on smaller vendors. The CMCTF did feel this was probably the best path forward for patients and vendors but was concerned about the implications they may be unaware of.

Modifications to the ONC Health IT Certification Program

The CMCTF had no comments on the corrections but had a few comments on the updates to the Principles of Proper Conduct for ONC-Authorized Certification Bodies (ONC-ACBs).



- **Sasha TerMaat** expressed concern regarding the proposed records retention requirements.
- **Sasha TerMaat** asked for clarity on the following: ONC-ACBs would be able to certify Health IT Modules that they have evaluated for conformance with certification criteria without first passing through an ONC-ATL as long as conformity methods were approved by the National Coordinator.

Deregulatory Actions

- **Raj Ratwani** requested more information from ONC on the 2% of the complete electronic health records (EHRs) and health IT modules which an ONC-ACB has issued a certification that must be subject to randomized surveillance.
- **Sasha TerMaat** proposes that random surveillance shouldn't hit the same module within 12 months.

Removal of the 2014 Edition from the Code of Federal Regulations

- The CMCTF did not have any concerns; they felt this seems non-controversial.
- **John Travis** shared that the chronic care management program is referenced in the 2014 Edition, but that would be the only concern.

Removal of the ONC-Approved Accreditor from the Program

- Current accreditor is American National Standards Institute (ANSI).
- **Sasha TerMaat** noted that feedback from the approved entities would be needed to provide insight.
- The CMCTF did not have concerns, but also noted that they are not close to this process.

Public Comment

There was no public comment.

Next Steps and Adjourn

Lauren Richie noted that there will be a recap of the topics discussed at the next meeting on Tuesday, March 12 at 9:00 a.m. ET.

Kate Tipping shared that Steve Posnack will be doing a presentation on application programming interfaces (APIs) on March 13. More details can be found on the ONC [website](#).

Lauren Richie adjourned the meeting at 10:17 a.m. ET.