EHR Reporting Program

ONC Program Implementation Overview

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The Office of the National Coordinator for
Health Information Technology

Presentation Overview

- 21st Century Cures Act requirements for the EHR Reporting Program

- Overview of ONC Implementation of the EHR Reporting Program

- ONC Approach to Developer-reported Measures

- Health IT Advisory Committee Charge

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21st Century Cures Act Requirements

The Cures Act specifies EHR Reporting Program feedback from:

- Developers of certified health IT

- Health care providers, patients, and other users of certified health IT *(voluntary)*

The EHR Reporting Program measures are required to reflect the following categories:

- Interoperability

- Conformance to certification testing

- Usability and user-centered design

- Security

- Other categories, as appropriate to measure the performance of EHR technology

EHR Reporting Program Timeline to Date

2018
ONC issued a Request for Information to inform the development of the EHR Reporting Program measures and processes; and ONC awarded a contract to the Urban Institute to support implementation of the Program

2020
The Urban Institute published voluntary user-reported measures, which were informed by a 60-day public feedback period

2021
The Urban Institute published draft developer-reported measures for Health IT Advisory Committee feedback and a 60-day public feedback period. Feedback is due to the Urban Institute by 9/14/2021

2018 — **2019** — **2020** — **2021**

2019 – 2020
The Urban Institute conducted a series of in-person and virtual stakeholder engagements to inform the development of the voluntary user-reported measures and draft developer measures

2020-2021
The Urban Institute conducted additional background research, market research, targeted virtual stakeholder engagements, and received ONC feedback to inform the development of the draft developer measures

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EHR Reporting Program Next Steps

September 2021
HITAC will provide recommendations to the National Coordinator on the draft developer-reported measures; public feedback period ends

TBD
Certified health IT developers will report on developer-reported measures

2021   **2022**

December 2021
Dec 2021: The Urban Institute, under contract with ONC, will consider HITAC and public feedback, and will deliver an initial set of developer-reported measures to ONC

2022
ONC will establish developer-reported measures as a Condition and Maintenance of Certification requirement under the ONC Health IT Certification Program via notice and comment rulemaking. This rulemaking will:
- Establish the EHR Reporting Program as a Condition and Maintenance of Certification
- Establish an initial incremental set of measures for certified health IT developers to report. Measures will evolve through subsequent rulemaking.

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ONC EHR Reporting Program: Implementation Approach

User-reported Measures

- Purpose: To provide publicly-available, comparative information on certified health IT products that will inform health IT users' purchasing and implementation decisions

- Scope: The initial set of measures addressed multiple categories including interoperability, usability, and privacy and security

- Reporting by users of certified health IT is voluntary

- ONC does not plan further implementation of these voluntary-user reported measures at this time

Developer-reported Measures

- Purpose: To address information gaps in the health IT marketplace and provide insights on how certified health IT is being used

- Scope: The initial set of measures will focus on interoperability, with an emphasis on (1) patient access, (2; 3) clinical and public health information exchange, and (4) standards adoption and conformance measures

- Reporting by developers of certified health IT will be mandatory

- ONC plans to implement as a Condition and Maintenance of Certification requirement under the ONC Health IT Certification Program

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Process for Establishing Developer-reported Measures

- Developer-reported measures reflect work completed by the Urban Institute, informed by background research, market research, and a variety of stakeholder engagements

- ONC and additional health IT measurement experts provided feedback and revisions to inform the draft developer-reported measures

- The Urban Institute solicited input on some, but not all, of the draft developer-reported measures

- HITAC feedback and public comment on the full set of measures will inform the Urban Institute final deliverable of an initial set of developer-reported measures to ONC

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ONC Measurement Approach: Measure Selection Criteria

- Measures of priority interoperability functions

- A measure set and measure concepts that are incremental to start; that have potential to evolve and expand to other measure categories in future iterations of the Condition & Maintenance of Certification requirement.

- Relevant to ONC policy priorities and broader stakeholder interests

- Value of the measures is net greater than burden for collecting the measures

- Can't otherwise obtain, if not through regulation

- Not duplicative of other data collection

- Focused on measures that developers can report on a product level, across their customer base(s)

- Measures that can be trended

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ONC Measurement Approach:
Scope of Draft Interoperability-Focused Measures

- Patient access

- Public health information exchange

- Clinical care information exchange

- Standards adoption and conformance

ONC Measurement Approach: Additional Considerations

Address information gaps in the health IT marketplace and provide insights on how certified health IT is being used:

- Measures intend to provide insights on interoperability broadly, not just to compare certified health IT products by developers

- Measures reflect a combination of EHR developer-controlled issues as well as provider implementation and behaviors

- Variation in measure results may improve understanding of providers' and developers' roles related to the measure

- Measure outputs may be reported in ways to show variation

- Variation in measure reporting applicability to developers may occur

  - Developers would only report measures applicable to ONC certification criteria for which they have products

  - Other potential exemptions from reporting requirements

EHR Reporting Program – Draft Developer Measures: Health IT Advisory Committee Task Force Charge

- **Vision:** To address information gaps in the health IT marketplace among all stakeholders, including ONC, and provide insights on how certified health IT is being used

- **Overarching Charge:** Make recommendations to prioritize and improve the draft set of developer-reported, interoperability-focused measures for the ONC EHR Reporting Program

- **Specific Charges:** Review the draft developer-reported measures and supporting materials developed by the Urban Institute, under contract with ONC, and provide recommendations to prioritize the measures and suggest ways to improve the draft measures

  - Consider background research, reports, and other sources as relevant to inform analysis of draft measures

  - Consider both established and emerging measurement practices and capabilities, as well as technical, legal, and policy requirements

  - Consider the use, technical feasibility, and potential policy impacts of the draft measures

  - Prioritize the draft measures to elevate those with the most potential for addressing gaps and providing insights in the certified health IT marketplace

  - Consider ways to avoid placing undue disadvantage on small and startup health IT developers in reporting measures

  - Develop recommendations to inform revisions to improve an initial set of developer-reported, interoperability-focused measures

  - Suggest additional measures and measure categories to prioritize for subsequent iterations of the developer-reported measures

  - Approve recommendations for submission to the National Coordinator by September 9, 2021

EHR Reporting Program Task Force Roster

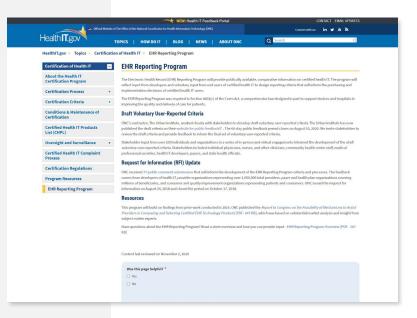| Name	Organization
Raj Ratwani (Co-Chair)	**MedStar Health**
Jill Shuemaker (Co-Chair)	**American Board of Family Medicine Foundation**
Zahid Butt	Medisolv Inc
Jim Jirjis	HCA Healthcare
Bryant Karras	Washington State Department of Health
Joseph Kunisch	Harris Health System
Steven Lane	Sutter Health
Kenneth Mandl	Boston Children's Hospital
Abby Sears	OCHIN
Sasha TerMaat	Epic
Sheryl Turney	Anthem, Inc.
Steven Waldren	American Academy of Family Physicians

EHR Reporting Program Task Force Schedule

- Thursdays, 10 – 11:30 AM Eastern

- Beginning July 15, 2021 and ending September 2, 2021

- Task Force meetings are open to the public

EHR Reporting Program
For More Information…

HealthIT.gov Resources
https://www.healthit.gov/topic/certification-health-it/ehr-reporting-program

- ONC Request for Information comments
- Prior ONC report with market analysis and insights from subject matter experts
- Resources from the Urban Institute developed under contract with ONC