Certification & Adoption Workgroup Recommendations on LTPAC/BH EHR Certification

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Certification and Adoption Workgroup

Member	Organization
Larry Wolf, Chair	**Kindred Healthcare**
Marc Probst	Intermountain Healthcare
Joan Ash	Oregon Health & Science University
John Derr	Golden Living, LLC
Carl Dvorak	Epic Systems Corporation
Paul Egerman	Businessman/Entrepreneur
Joseph Heyman	Whittier IPA
George Hripcsak	Columbia University
Stanley Huff	Intermountain Healthcare
Elizabeth Johnson	Tenet Healthcare Corporation
Charles Kennedy	Aetna
Michael Lardiere	National Council for Community Behavioral Healthcare
Donald Rucker	Ohio State University
Paul Tang	Palo Alto Medical Foundation
Micky Tripathi	MA eHealth Collaborative
Maureen Boyle, ex officio	Substance Abuse and Mental Health Services Administration (SAMHSA)
Jennie Harvell, ex officio	Office of the Assistant Secretary for Planning and Evaluation (ASPE)

HITPC Charge to the C/A Workgroup

Health IT Policy Committee
A Public Advisory Body on Health Information Technology
to the National Coordinator for Health IT

- Recommend a process for prioritizing health IT capabilities for EHR certification that would improve interoperability across a greater number of care settings

- Recommendations shall take into account previously adopted ONC certification criteria and standards and identify the key heath IT capabilities needed in care settings by providers who are ineligible to receive EHR incentive payments under the HITECH Act

The Scope of Work for the Charge

Health IT Policy Committee
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to the National Coordinator for Health IT

Complete ✓

Step 1: Draft a process that could be used to identify and prioritize certification criteria for health IT that is used by providers outside of the Meaningful Use Program and for which an ONC certification program would be helpful.

In process

Step 2: Recommend a specific application of this process for EHRs used in long-term/post-acute care (LTPAC) and behavioral health (BH) settings.

Agenda

Health IT Policy Committee
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- Certification Criteria Principles

- Organizing Principle for Recommendations

- **Recommendation for LTPAC and BH EHR Certification Criteria – Part 1 (Step 2 of Charge)**
  - Transitions of Care
  - Privacy and Security

Examining Voluntary Certification: Examples of Stakeholder Comments from LTPAC/BH Hearings

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- "We believe that for LTPAC EHR vendors to embrace and pursue ONC's proposed voluntary certification program, the program must … <u>better align the certification criteria with those of the 2014 Edition of ONC-ATCB Meaningful Use Certification</u> but be relevant to LTPAC settings …"

- "<u>We support voluntary certification because it is a step toward greater interoperability and exchange of health information</u>. The patient population our membership serves is different, as are the HIT systems that have been designed to support them."

- "In concert with the <u>modular approach, we propose that these new certifications fall in line with MU standards for interoperability, and that data structures within the Modular EHR conform to those of MU certified systems</u>, so as to improve the utility of information offered through an HIE, and to reduce the need for interface customization. "

Certification Criteria Principles

- Leverage the existing certification program

- Voluntary

- Modular

- Interoperability (exchange and use across organizations)

- Privacy and Security (with enhancements)

- Setting-specific needs
  (assessments, code sets, group documentation)

- Alignment across state and federal programs

- Minimum burden

- Limited funding

- Very heterogeneous provider group

Organizing Principles for Recommendations

For ALL Providers

- Transition of Care

- Privacy and Security

- Enhancements to Privacy and Security

LTPAC Setting-Specific

- Patient Assessments
- Survey and Certification

BH Setting-Specific

- Patient Assessments
- Consent Management (included under Enhancements to Privacy and Security)

For some LTPAC and BH Providers

- Clinical Reconciliation
- Clinical Health Information
- Labs/Imaging
- Medication-related
- CPOE
- Clinical Decision Support
- Quality Measures
- Patient Engagement
- Advanced Care Planning
- Data Portability
- Public Health - Transmission to Immunization Registries

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Recommendations for ALL Providers

Transitions of Care

1. Support the ability to receive, display, incorporate, create and transmit summary care records with a common data set in accordance with the Consolidated Clinical Document Architecture (CCDA) standard and using ONC specified transport specifications. (reference: §170.314(b)(1) , 45 CFR §170.314(b)(2))

2. **NEW** In addition, if approved by HHS for MU, support the inclusion of emerging HL7 TOC and care planning standards when standards become mature.

Focus Area	Type	Provider Use Effort	Standards Maturity	Development Effort
Care Coordination	ALL Providers - Primary Care Hospital Specialty LTPAC BH	High	1. High (MU2 TOC standards) 2. Low (Emerging TOC, care planning standards)	High

Recommendations for ALL Providers

Privacy and Security

- Support existing ONC-certified Privacy and Security requirements:

§ 170.314(d)(1) - Authentication, Access Control, and Authorization

§ 170.314(d)(2) - Auditable Events and Tamper-Resistance

§ 170.314(d)(3) - Audit Report(s)

§ 170.314(d)(4) - Amendments

§ 170.314(d)(5) - Automatic Log-Off

§ 170.314(d)(6) - Emergency Access

§ 170.314(d)(7) - End-User Device Encryption

§ 170.314(d)(8) - Integrity

§ 170.314(d)(9) – Optional: Accounting of Disclosures

- HHS should support educational awareness initiatives for LTPAC/BH providers, incl. how certification supports the technological requirements of HIPAA, however, compliance with HIPAA requires actions that extend beyond the ONC-certified privacy and security criteria.

Focus Area	Type	Provider Use Effort	Standards Maturity	
Privacy and Security	ALL Providers – Primary Care Hospital Specialty LTPAC BH	Low	High	Low

- Alignment of standards and certification criteria across <u>all</u> heath providers is essential for transitions of care (TOC).

- Refinements to the TOC and care planning standards in the Fall HL7 2013 CCDA ballot will support care coordination for LTPAC, BH and other health care providers across the care continuum.

- Operational experience with emerging standards is needed before inclusion in certification.

- ONC should assess emerging standards maturity

  – Standards development cycles may vary (e.g., standards that have never been collected versus vocabularies in use by a sector, but newly added to the CCDA)

Workplan

Date	Call Schedule
Week of 5/5/2014	Blog on Voluntary Certification for LTPAC and BH
5/7/2014, 5/8/2014	Certification Hearing
5/9/2014	Review Voluntary Certification Recommendations (ahead of Listening Session)
5/13/2014	Listening Session on Voluntary Certification for LTPAC and BH
5/22/2014	Update Voluntary Certification Recommendations
5/28/2014	Review Voluntary Certification Public Comment, Finalize Voluntary Certification Recommendations
06/10/2014	HITPC Recommendations