Information on How to Become a Designated Test EHR

July 26, 2013

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- Overall Architecture
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- How to Become a designated Test EHR
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  - Pilot Launch

Transition of Care Objective

- MU2 advances beyond MU1 by focusing on actual electronic information exchange
- Providers must demonstrate a cross-vendor exchange capability
    1. Live exchange between providers (in vivo)
    2. CMS-designated test system (in vitro)

- **Measure #1 requires that a provider send a summary of care record for <u>more than 50%</u> of transitions of care and referrals.**

- **Measure #2 requires that a provider electronically transmit a summary of care for <u>more than 10%</u> of transitions of care and referrals**

- **Measure #3 requires at least one summary of care document sent electronically to recipient with different EHR vendor or to CMS test EHR**

- Requires eligible professionals (EPs) and eligible hospitals/critical access hospitals (CAHs) to **either**:

    – Conduct one or more successful electronic exchanges of a summary of care document, with a recipient who has EHR technology designed by a different EHR technology developer than the sender's [*Option 1, preferred*]

Or

    – **Conduct one or more successful tests with the <u>CMS designated test EHR</u> during the EHR reporting period [*Option 2*]**

- Simulate "real" life exchange using Stage 2 certified EHR technologies

- Technical requirements does not add burden beyond current certification requirements for Stage 2 MU

- Requirements to be clarified during pilot phase (*to be launched soon*) to allow maximum vendor input

Current Status and Plans

- Designate **multiple** "Test EHRs" for providers that wish to use **Option 2** for meeting measure #3

- CMS and ONC have identified **minimum** technical capabilities for being designated as "Test EHRs"
  - Test EHRs will only test required _Direct transport_ capabilities at this time
  - Test EHRs supporting optional transport standard will be planned in future

- NIST developing test tool that will register "Test EHRs" and used by providers to find **random** match

Current Status and Implementation Plans
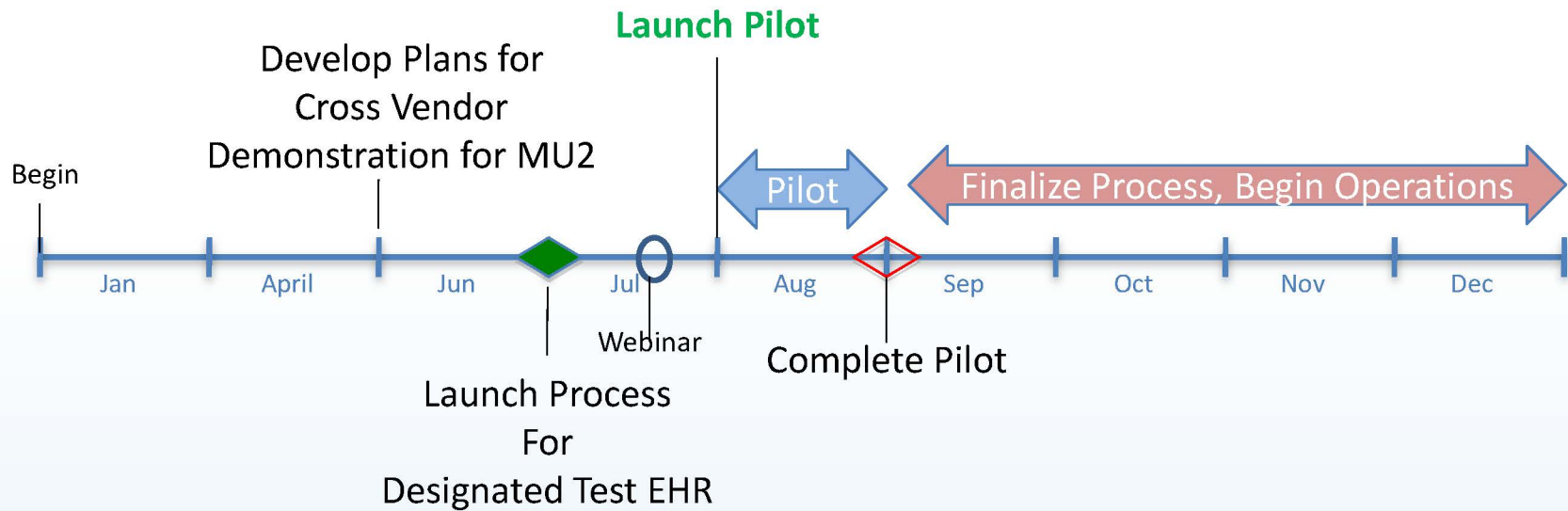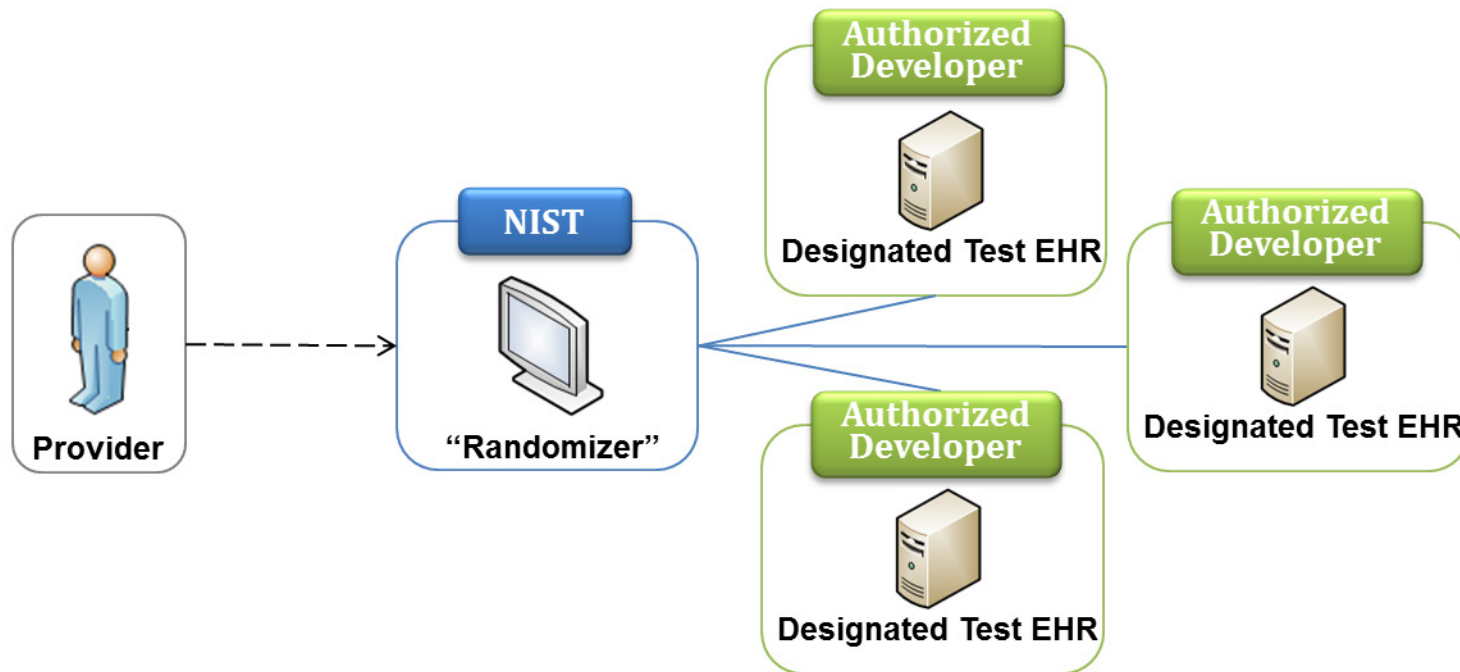
Process for becoming a designated Test EHR

How can a product become a Test EHR?

Health**IT**.gov

Five Step Process

1. Test EHR must achieve minimum certification requirements, described in the test instructions
2. Test EHR must comply with testing requirements, described in the test document

Final

3. Test EHR must establish process for required documentation
4. Authorized Vendor must abide by codes of conduct
5. Test EHR must register on the Randomizer tool, hosted by NIST

To be Finalized during Pilot

- EHR technology must be certified to the ONC 2014 Edition HIT Certification criterion at 45 CFR 170.314(b)(1) for transitions of care – receive, display, and incorporate transition of care/referral summaries (summary of care records) and this certification must be maintained as long as your product serves as a Test EHR.

- Test EHR must be an instance of the vendor's certified product hosted at vendor managed site (can be a test environment)

- Test EHR must be deployed exactly as certified

- Test EHR should be able to receive <u>test data</u> of summary of care document from provider using *<u>Direct transport</u>* standard

  - Test EHRs will only test *<u>Direct transport</u>* capabilities at this time

- Test EHRs must have capability to send documentation back to providers indicating a successful receipt of test data from providers that test with your system
  - This may be in the form of a processed message disposition notification (MDN) as long as the provider engaged in the test receives it.
  - Organizations can specify alternative ways (e.g. emails to provider POC may also suffice)
- Additional guidance will be developed during pilot

Step 4. Abide by the codes of conduct

- Test <u>only</u> the specified capabilities described in test instructions document

- Must <u>publish</u> schedule availability of the test EHR for providers

- Must agree to <u>confidentiality</u> related to actual test

- Additional guidance will be developed during pilot

- Role of NIST "Randomizer" Tool is to match the provider's certified EHR with a "Test EHR"

- Test EHR must maintain registration on the Randomizer tool, to enable random "matching"

- Additional guidance on registration information will be developed during pilot

Five Step Process

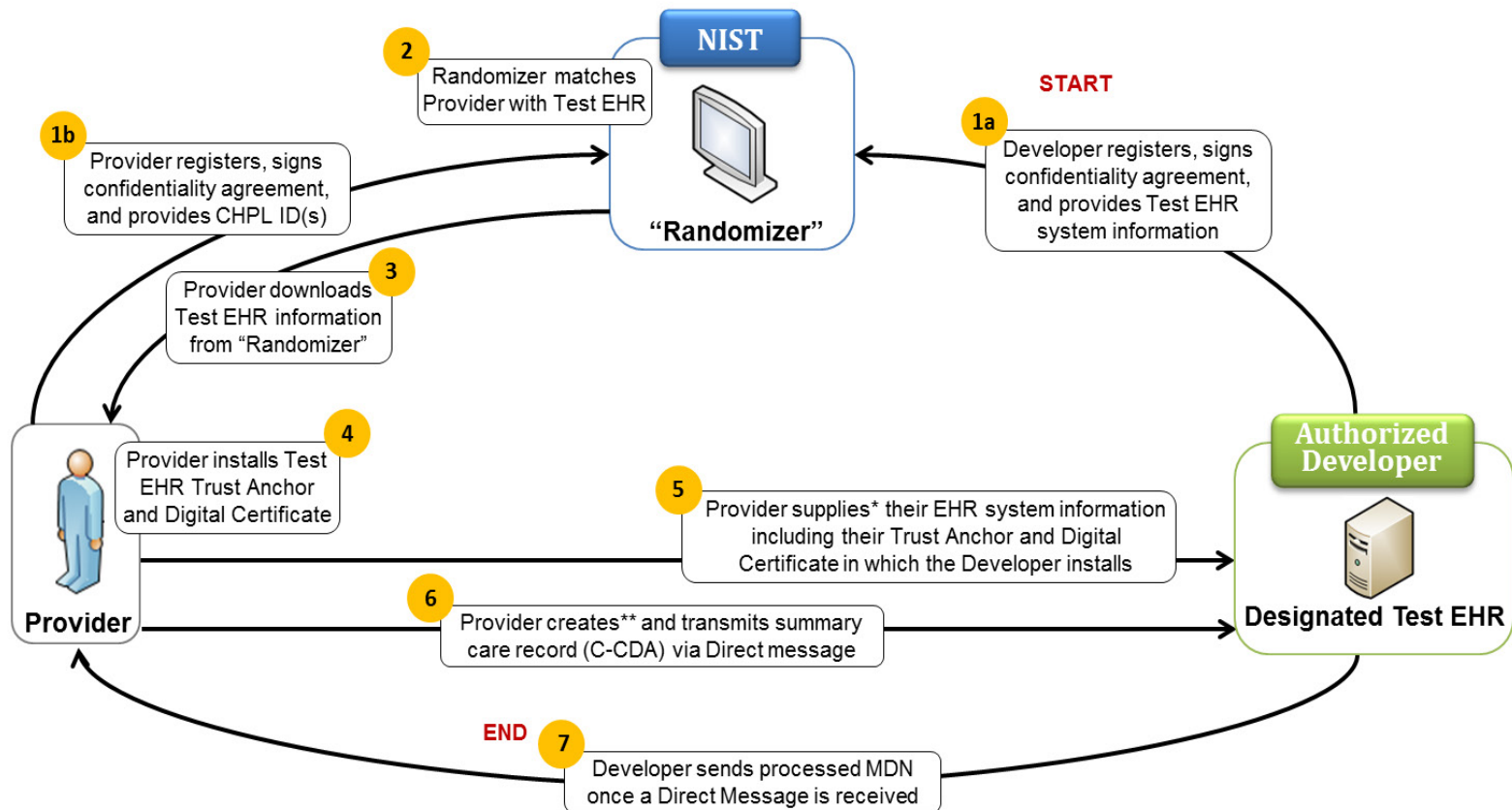1. Test EHR must achieve minimum certification requirements, described in the test instructions

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START

NIST

2 Randomizer matches Provider with Test EHR

"Randomizer"

1a Developer registers, signs confidentiality agreement, and provides Test EHR system information

1b Provider registers, signs confidentiality agreement, and provides CHPL ID(s)

3 Provider downloads Test EHR information from "Randomizer"

Authorized Developer

4 Provider installs Test EHR Trust Anchor and Digital Certificate

5 Provider supplies* their EHR system information including their Trust Anchor and Digital Certificate in which the Developer installs

Provider

Designated Test EHR

6 Provider creates** and transmits summary care record (C-CDA) via Direct message

END **7** Developer sends processed MDN once a Direct Message is received

*Direct communication between Provider and Developer, not through the "Randomizer"
**Summary care record shall not contain real patient data

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Next Steps – Pilot Launch

Announcing Call for Pilot Participation

- ONC to launch pilot program for participants interested in being designated Test EHR
    - Approximately 5-7 participants will be selected that meet minimum criteria
    - Provide variety in characteristics such as size, commercial status, type of EHR product
    - Pilot to begin early August and last for approximately 1 month
    - No changes to certification and testing requirements anticipated, but will refine and finalize more granular aspects of the processes with input from pilot participants
    - Based on Pilot feedback, ONC, CMS to develop process for designating Test EHRs on a ongoing basis

How to join the Pilot

- Participants interested in joining pilot program for becoming designated Test EHR are requested to:
    1. Review the "Developer Participant Information for Cross Vendor Exchange" document and the "Test Instructions for Cross Vendor Exchange" document from ONC Web site
    2. Submit a letter of intent to ONC, Ms Nora Super (Nora.Super@hhs.gov) with the following information:
        - Ability to conduct test specified in the Test Instructions document
        - Willingness to participate in the pilot program if selected
        - Interest in becoming a designated Test HER

- ONC will communicate to the selected pilot participants individually at the start of the pilot

- Main Information about the Cross Vendor Exchange program is available at:
  - http://www.healthit.gov/policy-researchers-implementers/process-become-cms-designated-test-ehr

- General questions about the Cross Vendor Exchange should be directed to xvendor.exchange@hhs.gov

- NIST Randomizer tool information will be available at:
  - http://ehr-randomizer.nist.gov
  - http://groups.google.com/group/ehr-randomizer