

CERTIFIED HEALTH IT PRODUCT LIST (CHPL) PRODUCT VERSIONING FREQUENTLY ASKED QUESTIONS (FAQ)

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PROVIDER FAQ

My health IT product is on the CHPL, but not the version I am using. What should I do?

If you cannot find the version of your health IT product on the CHPL, first check that the certification status of your product has not been withdrawn or terminated. You can do this by either using the "Certification Status" filter under the "Advanced Search" option on the search page or by viewing the "Decertified Products" or "Inactive Products" pages on the CHPL under "Shortcuts".

Please consult your health IT product developer if you still cannot find your health IT product version on the CHPL. Note that not all developers report the build number of their products on the CHPL. For example, if a health IT product is certified as version 4.2, but the specific product version you see in your product is "4.2.1234," it could be that the ".1234" is a numbering scheme used by your health IT developer for its internal tracking purposes but does not affect the "4.2" listing on the CHPL. Generally, the version listed on the CHPL should encompass all subversions released after it (e.g., version 4.2 encompasses subversions 4.2.1, 4.2.2, 4.2.3, and so on). Again, you should confirm with your product's developer if you are unsure of the certification status of your product.

There are multiple health IT products with the same name and version on the CHPL. Which health IT product should I pick?

To help you better distinguish between similar certified health IT products, the CHPL has a "Compare Products" tool. Use this to compare two or more product side-by-side to help you determine which one you are looking for. This function displays the certification criteria and clinical quality measures to which each product compared is certified.

If you still cannot determine which health IT product is yours, then you should consult your product's developer for clarification.

My health IT product version is "Withdrawn by Developer," but there is a later version that is "Active." Should I generate a CMS EHR Certification ID with the later version?

No, you should generate your CMS EHR Certification ID with all the health IT products that you used during the performance period on which your attestation to CMS will be based. If one or more of those products had their certification withdrawn, you may still generate a CMS EHR Certification ID with those products. CMS allows some products to be used for attestation if they had an active certification status during the attestation period. Please confirm that your product is still valid for attestation. If it is not, you may need to apply for a [CMS Hardship Exemption](#).

In addition, please review the surveillance activities of your product to ensure that there are no non-conformities related to certification criteria. Finally, if necessary, contact the developer of your health IT product about getting an updated, conformant version of your product.

I have upgraded my health IT products throughout the year. Should I generate a CMS EHR Certification ID with all the products I used, or just the latest?

You should report all certified health IT products that you used during your attestation period. Add all those products into the CMS ID Creator to generate your CMS EHR Certification ID.

DEVELOPER FAQ**I have a new version/build of my certified health IT product, but I have not changed any certification criteria. Do I still need to certify it?**

If you have made changes to your certified product, you should inform your ONC-ACB that you have done so. Although there is no explicit requirement to report your internal versioning techniques for a CHPL-listed product version (e.g., to accommodate build numbers, service packs, patches, fixes), we recommend that such changes be reported to prevent any confusion between you and your ONC-ACB. In addition, you may wish to consider including information about your versioning techniques and how they relate to certification on your website or as part of your disclosures under 45 CFR 170.523(k)(1). This may help users easily identify which versions are certified when they generate their CMS EHR Certification IDs. As a reminder, if you choose to market a health IT product that is differently versioned from the version(s) listed on the CHPL, then you would need to acquire a new certificate for the different version you plan on marketing. For example, V4.2 is on the CHPL, and you seek to market V4.8. Version V4.8 would not be considered a part of an internal version of a broader V4 CHPL listing, but instead is its own unique version and requires a new certificate. As a reminder, all updates made to your product that affect the capabilities in certification criteria to which the “safety-enhanced design” criterion applies must be reported to your ONC-ACB on a quarterly basis. Health IT developers must follow ONC-ACB processes for reporting changes to product functionality used to meet certification requirements.

I want to expand the scope of a certificate already issued to my health IT product by adding more certification criteria to it. Do I need to certify a new product to do this?

It depends. You will need to determine your intended marketing strategy and discuss options with your ONC-ACB. For example, some health IT developers add new criteria to an existing certified product as a result of a desired “phased” approach to certification and have established this strategy up front. A phased approach to certification is when a developer informs its ONC-ACB of the final set of certification criteria its product will be certified to, but plans to certify the product in steps, adding new criteria as they are prepared to test. In this case, you may add criteria to the product without creating a new listing on the CHPL so long as you ensure that any users of the product receive the latest updates. Moreover, you and your ONC-ACB should establish an appropriate method for identifying these changes for traceability.

In other cases, due to market demand, a health IT developer may decide to get its already CHPL-listed product certified to additional criteria. In this case, the developer would need to make a business decision as to whether to update the product’s existing certificate scope or seek a separate certificate for the expanded scope. Either way, you must work with your ONC-ACB, and the added criteria must be assessed against ONC Health IT Certification Program requirements. Further, ONC recommends that health IT developers establish their marketing approach early on and work with the ONC-ACB to establish best practices and strategies.

I want to remove criteria from my already certified health IT product. Do I need to certify a new product?

Yes. If you remove criteria from a certified health IT product, you must certify a new product and create a new listing on the CHPL. If you are no longer supporting the product with the criteria to be removed, then you should withdraw that product's certificate. In addition, you should inform any users who would be affected by this withdrawal and whose participation in the CMS Quality Payment Program may be impacted.

Please note that when a health IT developer requests to withdraw a certificate, such action can trigger a "certification ban" from the ONC Health IT Certification Program in four circumstances. As outlined in 45 CFR 170.581(a), the circumstances that can trigger a certification ban may occur when one or more of a health IT developer's Health IT Modules is:

- i. Terminated by ONC under the ONC Health IT Certification Program
- ii. Withdrawn from the ONC Health IT Certification Program by an ONC-ACB because the health IT developer requested it to be withdrawn (for reasons other than to comply with Program requirements) when the health IT developer's health IT was the subject of a potential non-conformity or non-conformity as determined by ONC;
- iii. Withdrawn by an ONC-ACB because of a non-conformity with any of the certification criteria adopted by the Secretary under subpart C of part 170;
- iv. Withdrawn by an ONC-ACB because the health IT developer requested it to be withdrawn (for reasons other than to comply with Program requirements) when the health IT developer's health IT was the subject of surveillance for a certification criterion or criteria adopted by the Secretary under subpart C of part 170, including notice of pending surveillance.

ONC may also determine a certification ban is appropriate per its review under § 170.580(a)(2)(iii). Further information about the certification ban can be found [here](#).

I have certified several versions of a health IT product. When should I withdraw certificates of old versions?

If you are no longer supporting old versions of a CHPL-listed product, you should withdraw their certificates immediately, especially if you anticipate these versions will have no active users. We recommend that health IT developers inform any users of those products of a pending withdrawal and ensure that they have the opportunity to upgrade to newer versions before the product's certificate is withdrawn.

Please note that when a health IT developer requests to withdraw a certificate, such action can trigger a "certification ban" from the ONC Health IT Certification Program as discussed above. Further information about the certification ban can be found [here](#).