



2015 Edition Proposed Rule Modifications to the ONC Health IT Certification Program and the 2015 Edition Health IT Certification Criteria

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- **An Open and Accessible ONC Health IT Certification Program**
- **2015 Edition – Goals, Key Proposals & Draft Test Procedures**
- **Modifications to the ONC Health IT Certification Program**
- **Certification to the 2015 Edition Use Cases (MU & Beyond)**
- **Public Comment**

An Open and Accessible ONC Health IT Certification Program

- **Current:** Prior editions were adopted with a specific focus on the EHR Incentive Programs
- **Proposed:** A more accessible ONC Health IT Certification Program supportive of:
 - Diverse health IT systems, including but not limited to EHR technology (“Health IT Module” instead of “EHR Module”)
 - Remember that there is no “Complete EHR” certification to the 2015 Edition or future editions
 - Health IT across the care continuum, including long-term and post acute care settings

Supporting the Broader Care Continuum: How Would It Work?

The Past (2011 and 2014 Editions)

- ONC included **policy** that supported the EHR Incentive Programs in its previous Editions
 - Defined the Certified EHR Technology (CEHRT) definition on behalf of CMS
 - Required “meaningful use measurement” criteria
 - Specified the minimum number of clinical quality measures developers must certify to in order to participate in the EHR Incentive Programs
 - Specified criteria as “ambulatory” or “inpatient”

The Proposed Future (2015 and Future Editions)

- ONC does not include **policy** to support the EHR Incentive Programs in its Editions
 - Each program sets its own requirements (e.g., CMS defines the CEHRT definition in its rule)
 - ONC’s Health IT Certification Program is “agnostic” to settings and programs, but can support many different use cases and needs
 - This allows ONC’s Health IT Certification Program to support multiple program and setting needs, for example:
 - EHR Incentive Programs
 - Long-term and post-acute care
 - Chronic care management
 - Behavioral health
 - Other public and private programs

A number of programs currently use or are proposing to use the ONC Health IT Certification Program. Here are a few:

- Physician Self-Referral Law exception and Anti-kickback Statute safe harbor for certain EHR donations
- CMS chronic care management services
- Department of Defense Healthcare Management System Modernization Program
- The Joint Commission for participation as ORYX vendor – eCQMs for hospitals

2015 Edition

Goals, Key Proposals &

Draft Test Procedures

Overview of the 2015 Edition Proposed Rule

- Supports HHS-wide goals to achieve better care, smarter spending, and healthier people
- Builds on the foundation established by the 2011 and 2014 Editions and addresses stakeholder feedback
- Supports health IT components necessary to establish an interoperable nationwide health information infrastructure
- Incorporates changes designed to foster innovation, support interoperability across the care continuum, open new market opportunities, and provide more provider and patient choices in electronic health information access and exchange

INTEROPERABILITY

ACCESS

USER/MARKET RELIABILITY

SUPPORTING THE CARE CONTINUUM

2015 Edition

Specific Health IT Goals

Improve Interoperability

**Facilitate Data Access
and Exchange**

**Ensure
Privacy and Security
Capabilities**

Improve Patient Safety

Reduce Health Disparities

**Improve the Reliability
and Transparency of
Certified Health IT**

**Use the ONC Health IT
Certification Program to
Support the Care Continuum**

**Support Stage 3 of the EHR
Incentive Programs**



New and updated vocabulary and content standards for the structured recording and exchange of health information

- 2015 Base EHR definition
- Common Clinical Data Set
- Other use cases too! For example:
 - Public Health
 - Lab Interoperability

Improve Interoperability

- Focuses, at a minimum, on the functionalities that all users of certified Health IT should possess
- Ensuring that the minimum functionalities required by the HITECH Act remain in the Base EHR Definition
- The requirements can be met using a combination of certified Health IT Modules



**Facilitate Data
Access and Exchange**

Improve Patient Safety

2015 Base EHR Definition

* red = new to the Base EHR Definition

** privacy and security removed – now conditional certification requirements

Base EHR Capabilities	Certification Criteria
Includes patient demographic and clinical health information, such as medical history and problem lists	Demographics § 170.315(a)(5) Problem List § 170.315(a)(7) Medication List § 170.315(a)(8) Medication Allergy List § 170.315(a)(9) Smoking Status § 170.315(a)(12) Implantable Device List § 170.315(a)(20)
Capacity to provide clinical decision support	Clinical Decision Support § 170.315(a)(10)
Capacity to support physician order entry	Computerized Provider Order Entry (medications, laboratory, or diagnostic imaging) § 170.315(a)(1), (2) or (3)
Capacity to capture and query information relevant to health care quality	Clinical Quality Measures (CQMs) – record and export § 170.315(c)(1)
Capacity to exchange electronic health information with, and integrate such information from other sources	Transitions of Care § 170.315(b)(1) Data Portability § 170.315(b)(6) Application Access to Common Clinical Data Set § 170.315(g)(7) Direct Project § 170.315(h)(1) or Direct Project, Edge Protocol, and XDR/XDM § 170.315(h)(2)

Common Clinical Data Set

- Propose to rename the “Common MU Data Set.” This has no substantive impact for certification to the 2014 Edition.
- It includes key health data that should be accessible and available for exchange
- Data according to specified vocabulary standards and code sets, as applicable

Patient name	Lab tests
Sex	Lab values/results
Date of birth	Vital signs
Race	Procedures
Ethnicity	Care team members
Preferred language	Immunizations
Problems	Unique device identifiers for implantable devices
Smoking Status	Assessment and plan of treatment
Medications	Goals
Medication allergies	Health concerns

ONC Interoperability Roadmap Goal

2015-2017

Send, receive, find and use a common clinical data set to improve health and health care quality.

The Common Clinical Data Set and the Consolidated CDA

Patient name	Lab tests
Sex	Lab values/results
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Ethnicity	Care team members
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Smoking Status	Unique device identifiers for implantable devices
Problems	Assessment and plan of treatment
Medications	Goals
Medication allergies	Health concerns



The Consolidated CDA is the “suitcase” for exchanging data. It can carry any of the data in the Common Clinical Data Set. The data included depends on the need (e.g., EHR Incentive Programs requirements).

Transition of care for a single patient



Data portability for multiple patients



Improve Interoperability

**Facilitate Data Access
and Exchange**

- Consolidated CDA Release 2.0
- Testing a Health IT Module to both releases of the Consolidated CDA (Release 1.1 and 2.0) for creation and receiving
- Rigorous testing to ensure that a Health IT Module can: identify valid C-CDA templates; use correct vocabulary standards; detect errors in document, sections, and entry templates; and perform XDM processing
- As we did with the 2014 Edition Release 2, we propose certification for sending and receiving consistent with the Edge Protocol
- Patient matching data with constraints

Improve Interoperability

**Facilitate Data Access
and Exchange**

- Common Clinical Data Set + Other Data
- User-enabled creation of an export summary or summaries
- Formatted to the Consolidated CDA 2.0 for document-template types (CCD, Consultation Note, History and Physical, Progress Note, Care Plan, Transfer Summary, and Referral Note (+ Inpatient - Discharge Summary))
- Configuration (Timeframe, Event, and Location)



Improve Interoperability

**Facilitate Data Access
and Exchange**

Application Access to the Common Clinical Data Set (CCDS)

- Technology certified to this criterion will have to demonstrate a functioning API that can respond to requests for each individual data category included in the CCDS as well as a request for all of the data in CCDS at one time (formatted in Consolidated CDA 2.0 standard)
- In the **2015 Base EHR Definition**, thus it is required for providers participating in Stage 3 of the EHR Incentive Programs
- It's also part of the **View, Download, and Transmit to 3rd Party** criterion, enabling patient access
- This proposed capability is meant to represent a floor, not a ceiling



Improve Interoperability

Facilitate Data Access
and Exchange

Requirements

- 1) Security -- developer demonstrates a trusted connection can be established between source system's API and other software
- 2) Patient selection – means for an application to query for a patient's record
- 3) Data -- scope is limited to the data in CCDS per patient and a "get"/read-oriented request. Must support:
 - Data-category request (response format in XML/JSON)
 - All data request (response format in accordance with the Consolidated CDA)
- 4) Documentation
 - Must include accompanying documentation on technical implementation requirements
 - Must include terms of use, including developer agreements

Request for Comment

- 1) How to foster an open ecosystem around APIs
- 2) Whether additional API capabilities should be required for certification
- 3) Should the C-CDA 2.0 creation capability be limited to the CCD document template

Improve Interoperability

**Facilitate Data Access
and Exchange**

- Patient Matching
- Record and exchange Unique Device Identifiers
- Safety-enhanced Design
 - A conditional certification requirement for an expanded set of certification criteria compared to the 2014 Edition
 - Health IT developers must submit information about the user-centered design processes used and applied
- Quality Management System (QMS)
 - A mandatory requirement for certification of a Health IT Module to the 2015 Edition
 - Health IT developers must identify the QMS used to develop, test, implement, and maintain capabilities of certified technology.
 - The identified QMS system must be:
 - Compliant with one established by the federal government, or
 - Mapped to one or more QMS established by the federal government or standards development organizations
 - Attesting that a QMS was not used is no longer permitted



Addressing Health Disparities

Proposed Certification Criteria Capabilities	What the Capabilities Provide
More granular recording and exchange of patient race and ethnicity	Allows providers to better understand health disparities based on race and ethnicity, and improve patient care and health equity.
Recording social, psychological, and behavioral data (e.g., education level, stress, depression, alcohol use, sexual orientation and gender identity)	Allows providers and other stakeholders to better understand how this data can affect health, reduce disparities, and improve patient care and health equity
Exchange of sensitive health information (data segmentation for privacy)	Allows for the exchange of sensitive health information (e.g., behavioral health, substance abuse, and genetic information), in accordance with federal and state privacy laws, for more coordinated and efficient care across the continuum.
Accessibility of health IT	<ul style="list-style-type: none">• More transparency on the accessibility standards used in developing health IT• Compatibility of certified health IT with accessibility technology (e.g., JAWS text-to-speech application)• Web content accessibility for viewing capability of VDT

- **ONC has released draft test procedures for the proposed 2015 Edition health IT certification criteria**
 - Gives more transparency to the testing and certification processes
 - Health IT developers and all stakeholders have “early access”
- **Outcome-based test procedures**
 - Streamlined test procedure format focuses on outcomes
 - Promotes more innovation through less prescriptive testing
- **Public comment**
 - The comment period for the 2015 Edition Draft Test Procedures is **March 20th, 2015 through June 30th, 2015**
 - To review and comment, visit: <http://healthit.gov/policy-researchers-implementers/2015-edition-draft-test-procedures>

Modifications to the ONC Health IT Certification Program

Privacy and Security Certification Approach

- A Health IT Module would need to meet applicable privacy and security certification criteria depending on the other capabilities included in the Health IT Module
- Removes the responsibility from the provider to ensure that they possess technology certified to all the necessary privacy and security criteria



Ensure Privacy and Security Capabilities

- New requirements for “in-the-field” surveillance under the ONC Health IT Certification Program
- ONC-ACBs should ensure that certified Health IT Modules can perform certified capabilities in a production environment (when implemented and used)
 - Reactive surveillance
 - Randomized surveillance
- Enhanced surveillance of mandatory transparency requirements



Improve the Reliability
and Transparency of
Certified Health IT

Improve Patient Safety

- **ONC-ACBs must ensure health IT developers disclose:**
 - Broader and more detailed information than is currently required in the 2014 Edition.
 - Additional types of costs users may incur to implement or use health IT for any purpose within the scope of its certification (not just for achieving MU objectives).
 - Potential limitations (including contractual restrictions) that would limit a user's ability to implement or use health IT for any purpose within the scope of its certification.
- **Health IT developers will be required to attest to voluntarily providing this information:**
 - To customers, prospective customers, and any other person who asks for it (e.g., professional associations representing providers).
 - To do so timely, in plain writing, and in sufficient detail.

Improve the Reliability and Transparency of Certified Health IT



- Converting the CHPL to an open data file to make the reported product data (e.g., test results) more accessible for product analysis
- Propose to require that ONC-Authorized Certification Bodies (ONC-ACBs) report an expanded set of information in the open data file for increased product transparency

Improve the Reliability and Transparency of Certified Health IT

Certification to the 2015 Edition Use Cases (MU & Beyond)

Certification Program Requirements		Proposed 2015 Edition criteria pointed to by CMS for MU 3 & to implement statute (Base EHR definition) (n=37)		Available proposed 2015 Edition criteria for certification (n=19)
Criteria proposed as always required for 2015 Edition certification (n=2)	Criteria proposed as conditional for 2015 Edition certification depending on capabilities in scope (n= 10)			
<i>Quality Management System - (g)(4)</i>	<i>Authentication, Access Control, Authorization-(d)(1)</i>	<i>CPOE Medications (a)(1)</i>	Patient-specific Education Resources -(a)(17)	~Vital Signs, BMI, and Growth Charts - (a)(6)
*Accessibility-Centered Design-(g)(8)	<i>Auditable Events and Tamper-resistance- (d)(2)</i>	CPOE Laboratory (a)(2)	*Patient Health Information Capture – (a)(19)	~Image results - (a)(13)
	<i>Audit Report(s) - (d)(3)</i>	<i>CPOE Diagnostic Imaging (a)(3)</i>	*Implantable Device List - (a)(20)	~Patient List Creation - (a)(16)
	<i>Amendments - (d)(4)</i>	Drug-drug, Drug-allergy Interaction Checks for CPOE – (a)(4)	Transitions of Care – (b)(1)	~eMAR- (a)(18)
	<i>Automatic Access Time-out - (d)(5)</i>	Demographics -- (a)(5)	Clinical Information Reconciliation and Incorporation – (b)(2)	*Social, Psychological, and Behavioral Data - (a)(21)
	<i>Emergency Access-(d)(6)</i>	<u>Problem List – (a)(7)</u>	E-Rx - (b)(3)	*Decision Support – knowledge artifact - (a)(22)
	<i>End-User Device Encryption-(d)(7)</i>	<i>Medication list – (a)(8)</i>	Data Portability – (b)(6)	*Decision Support – service - (a)(23)
	<i>Integrity - (d)(8)</i>	<i>Medication Allergy List – (a)(9)</i>	CQM – record and export - (c)(1)	~Incorporate Laboratory Tests and Values/Results – (b)(4)
	Safety Enhanced Design - (g)(3)	CDS – (a)(10)	CQM – import and calculate – (c)(2)	~Transmission of Laboratory Test Reports – (b)(5)
	*Consolidated CDA Creation Performance – (g)(6)	Drug-formulary and Preferred Drug List Checks –(a)(11)	<i>CQM – report (c)(3)</i>	*DS4P – send (b)(7)
*Green = new to the 2015 Edition		<u>Smoking Status - (a)(12)</u>	VDT - (e)(1)	*DS4P – receive (b)(8)
		<u>Family Health History (a)(14)</u> ; or Family Health History – Pedigree (a)(15)	<i>Secure messaging - (e)(2)</i>	*Care Plan - (b)(9)
~Light Blue = Criteria in the “available” column previously adopted in a certification edition to support MU1/MU2		Transmission to Immunization Registries (f)(1)	*Transmission to PHA – case reporting (f)(5)	*CQM filter - (c)(4)
		Transmission to PHA – syndromic surveillance (f)(2)	*Transmission to PHA – antimicrobial use and resistance reporting (f)(6)	<i>Accounting of Disclosures – (d)(9)</i>
		Transmission to PHA – reportable laboratory tests and values/results (f)(3)	*Transmission to PHA – health care surveys (f)(7)	*Accessibility technology compatibility (g)(5)
Red italic font = “unchanged” criteria (eligible for gap certification)		Transmission to Cancer Registries (f)(4)	Automated Numerator Recording - (g)(1) or Automated Measure Calculation - (g)(2)	~SOAP Transport and Security Specification and XDR/XDM for Direct Messaging – (h)(3)
		*Application Access to Common Clinical Data Set – (g)(7)	<i>Direct Project (h)(1) or Direct Project, Edge Protocol, and XDR/XDM (h)(2)</i>	*Healthcare Provider Directory – query request (h)(4)
Blue underline font = “minimally revised” criteria				*Healthcare Provider Directory – query response (h)(5)
				*Electronic Submission of Medical Documentation– (i)(1)

Certification Responsibilities for Health IT Developers

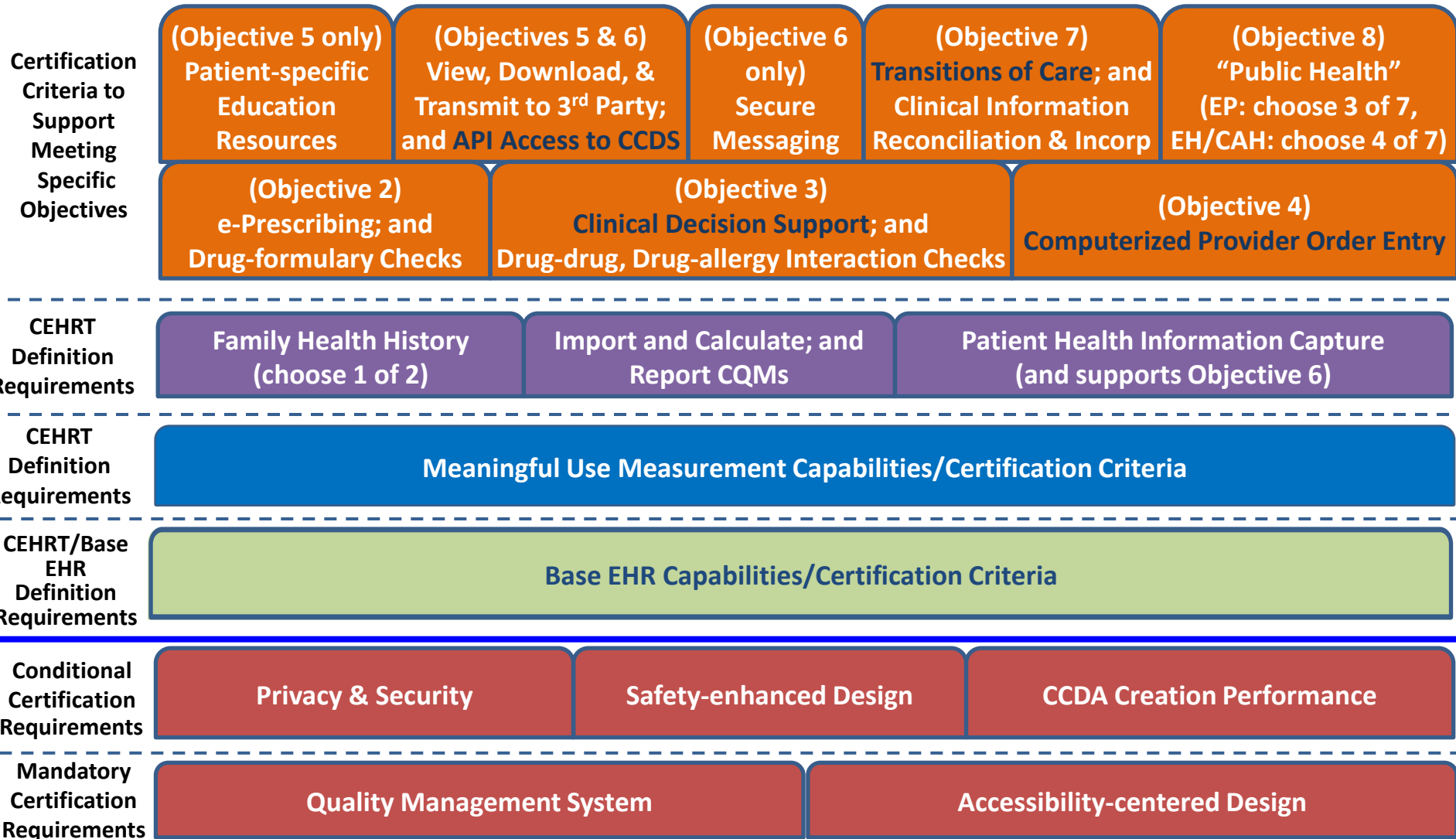
IF you seek product certification to the following:	THEN your product will <u>always</u> need to be certified to:	AND will also need to be certified to:
Any clinical criterion in 45 CFR 170.315(a)	<ul style="list-style-type: none"> The privacy & security (P&S) criteria at § 170.315(d)(1)-(d)(7) Quality management system (QMS) at § 170.315(g)(4) Accessibility-centered design (ACD) at § 170.315(g)(8) 	Safety-enhanced design (SED) at § 170.315(g)(3) if you seek certification to any one of the following criteria: <ul style="list-style-type: none"> § 170.315(a)(1)-(10), (18), (20), (22), and (23)
Any care coordination criterion in 45 CFR 170.315(b)	<ul style="list-style-type: none"> The P&S criteria at § 170.315(d)(1)-(d)(3) and (d)(5) - (d)(8) QMS at § 170.315(g)(4) and ACD at (g)(8) 	SED at § 170.315(g)(3) if you seek certification to any one of the following criteria: <ul style="list-style-type: none"> § 170.315(b)(2)-(b)(4) Consolidated CDA performance at § 170.315(g)(6) if you seek certification to any one of the following criteria: <ul style="list-style-type: none"> § 170.315(b)(1), (2), (6), (7), and (9)
Any clinical quality measures criterion in 45 CFR 170.315(c)	<ul style="list-style-type: none"> The P&S criteria at § 170.315(d)(1)-(d)(3) QMS at § 170.315(g)(4) and ACD at (g)(8) 	N/A
Any privacy and security criterion in 45 CFR 170.315(d)	<ul style="list-style-type: none"> QMS at § 170.315(g)(4) ACD at § 170.315(g)(8) 	N/A
Any patient engagement criterion in 45 CFR 170.315(e)	<ul style="list-style-type: none"> The P&S criteria at § 170.315(d)(1)-(d)(3), (d)(5), and (d)(7) QMS at § 170.315(g)(4) and ACD at (g)(8) 	Consolidated CDA performance at § 170.315(g)(6) if you seek certification to § 170.315(e)(1)
Any public health criterion in 45 CFR 170.315(f)	<ul style="list-style-type: none"> The P&S criteria at § 170.315(d)(1)-(d)(3) and (d)(7) QMS at § 170.315(g)(4) and ACD at (g)(8) 	N/A
45 CFR 170.315(g)(1) or (2)	<ul style="list-style-type: none"> QMS at § 170.315(g)(4) 	N/A
45 CFR 170.315(g)(7)	<ul style="list-style-type: none"> QMS at § 170.315(g)(4) and ACD at (g)(8) 	Consolidated CDA performance at § 170.315(g)(6)
Any transport methods and other protocols criterion in 45 CFR 170.315(h)	<ul style="list-style-type: none"> The P&S criteria at § 170.315(d)(1)-(d)(3) QMS at § 170.315(g)(4) and ACD at (g)(8) 	Transitions of care at § 170.315(b)(1) if you seek certification to § 170.315(h)(1)
Any administrative criterion in 45 CFR 170.315(i)	<ul style="list-style-type: none"> The P&S criteria at § 170.315(d)(1)-(d)(3) and (d)(5)-(d)(8) QMS at § 170.315(g)(4) and ACD at (g)(8) 	Consolidated CDA performance at § 170.315(g)(6) if you seek certification to § 170.315(i)(1)

Proposed EHR Incentive Programs

Stage 3 Meaningful Use Objectives

- **Objective 1:** Protect Patient Health Information
- **Objective 2:** Electronic Prescribing
- **Objective 3:** Clinical Decision Support
- **Objective 4:** Computerized Provider Order Entry
- **Objective 5:** Patient Electronic Access to Health Information
- **Objective 6:** Coordination of Care through Patient Engagement
- **Objective 7:** Health Information Exchange
- **Objective 8:** Public Health and Clinical Data Registry Reporting

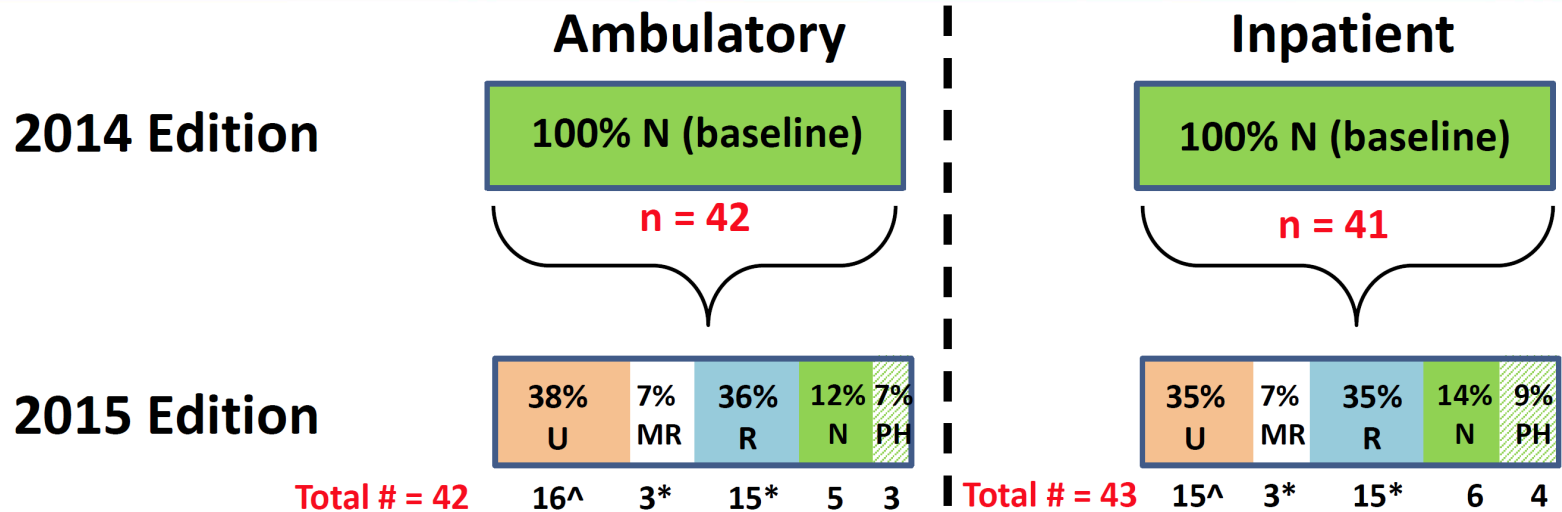
Certified Health IT Module(s) to Support the EHR Incentive Programs Stage 3



Support Stage 3 of the EHR Incentive Programs

What is Minimally Required for Stage 3?

2014 Edition vs. Proposed 2015 Edition



Bottom Line

- 45% of criteria are unchanged or minimally revised for the ambulatory setting.
- 42% of criteria are unchanged or minimally revised for the inpatient setting.
- Only need to do ~60% of the proposed 2015 Edition criteria to participate in Stage 3.
- The total minimum number of criteria needed to participate in Stage 3 remains the same for EPs and almost the same for EHs/CAHs as compared to Stage 2.

➤ **Note:** This analysis does not account for potential exclusions

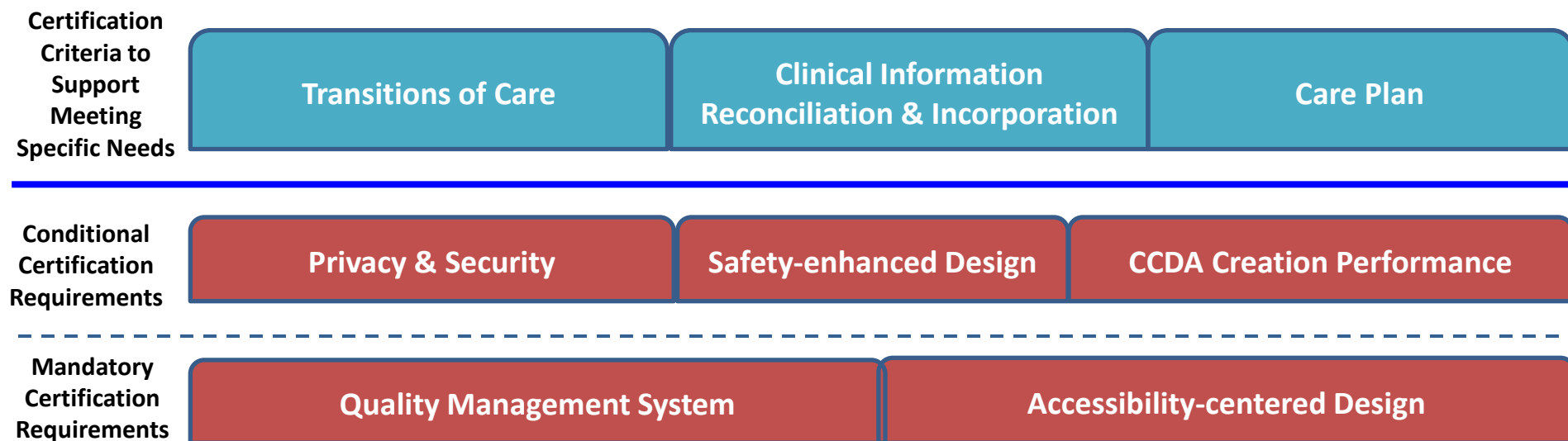
U = Unchanged criteria
MR = Minimally revised criteria
R = Revised criteria
N = New criteria

PH = Public health criteria (new and revised. EPs choose 3 of 6 measures and EHs/CAHs choose 4 of 6 measures.

^ Includes the "QMS" criterion, which may be revised for some health IT developers

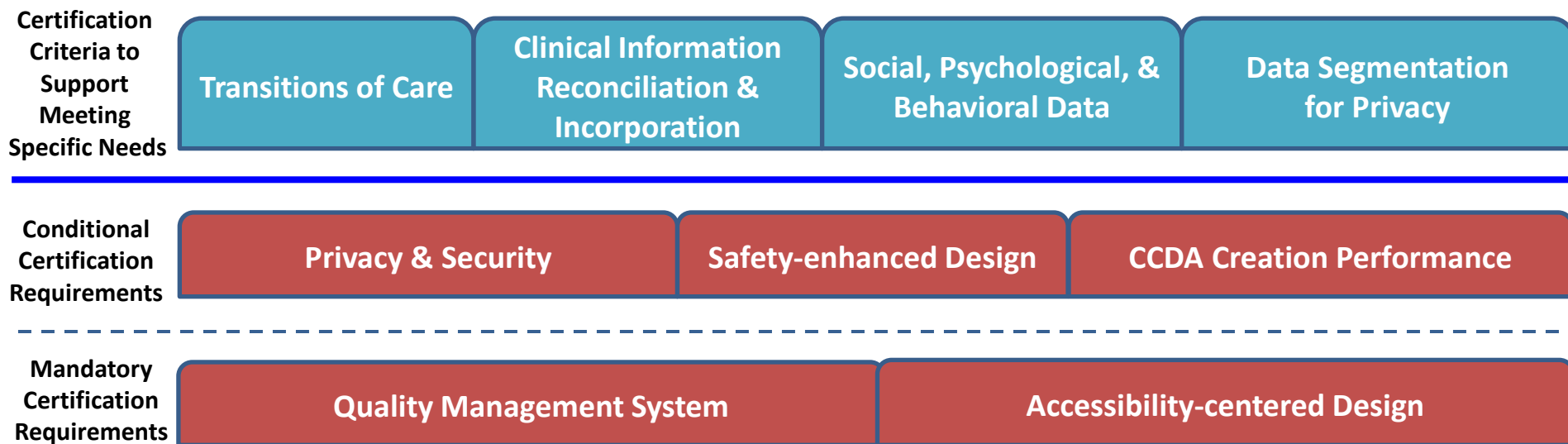
* Depends on which family health history criterion is chosen (SNOMED CT or pedigree)

Long-Term Post-Acute Care Certification (example only)



Use of the Health IT Certification Program
across the care continuum

Behavioral Health Certification (example only)



Use of the ONC Health IT Certification Program
to Support the Care Continuum

Public Comment

- ONC published the 2015 Edition Proposed Rule in the Federal Register on **March 30, 2015**
- The comment period is open until **May 29, 2015**
- You can review the proposed rule and comment here:
http://www.regulations.gov/#!documentDetail;D=HHS_FRDOC_0001-0572
- To assist in commenting on the rule, ONC provides a:
 - Microsoft Word version of the rule
(http://www.healthit.gov/sites/default/files/2015_editionnprm_ofr_disclaimer_3-20-15.docx); and
 - Public Comment Template
(http://www.healthit.gov/sites/default/files/2015editionnprm_public_comment_template_4-1-15_final508.docx)

- Press release: [http://www.healthit.gov/sites/default/files/HHS Proposes Rules Path Inop FINAL FORMATTED.docx](http://www.healthit.gov/sites/default/files/HHS_Proposes_Rules_Path_Inop_FINAL_FORMATTED.docx)
- Fact sheet: [http://www.healthit.gov/sites/default/files/ONC-Certification-Program-2015-Edition FactSheet.pdf](http://www.healthit.gov/sites/default/files/ONC-Certification-Program-2015-Edition_FactSheet.pdf)
- ONC regulations: <http://www.healthit.gov/policy-researchers-implementers/standards-and-certification-regulations>

QUESTIONS?