

EHR Technology Certification for Hospitals--Complete and Modular Options

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Presenters

- * **Bambi Rose—BLR Solutions**

Bambi Rose, RHIT, is the President and CEO of BLR Solutions, LLC. She has extensive experience working with vendors and providers helping them to prepare for technology certification testing under the ARRA Meaningful Use incentive program and other proprietary certification programs. Bambi also has years of experience evaluating, selecting, purchasing and implementing electronic health record systems in both the ambulatory provider and hospital environments, and she has worked with most of the major vendors in the marketplace.

- * **Jim Tate—EMR Advocate, Inc.**

Jim Tate, President of EMR Advocate, Inc., is a nationally recognized expert on the CMS EHR Incentive Program and the “meaningful use of certified technology.” He is an accomplished project manager and has led numerous EHR implementations in the United States and Asia. Jim has worked with over 150 HIT vendors in the development and certification of both EHR and Practice Management systems.

A Brief History of the American Recovery and Reinvestment Act of 2009 (ARRA)

- * Effective Feb 19, 2009
- * **HITECH** is the section dealing with health IT
- * Codified the Office of the National Coordinator (ONC), and HIT Policy and HIT Standards Committees
- * Allocated \$2B for programs directly administered by ONC
- * Provided ~\$20B in incentive payments (and penalties for noncompliance) for Eligible Providers and Hospitals under Medicare and Medicaid for “adoption and meaningful use of certified EHR technology”

A Brief History of ARRA (cont.)

- * Why are incentives needed for EHR adoption?
- * Who qualifies?
- * Stages of the program
- * What are Authorized Testing and Certification Bodies (ATCB's)?
- * Oversight by ONC and CMS

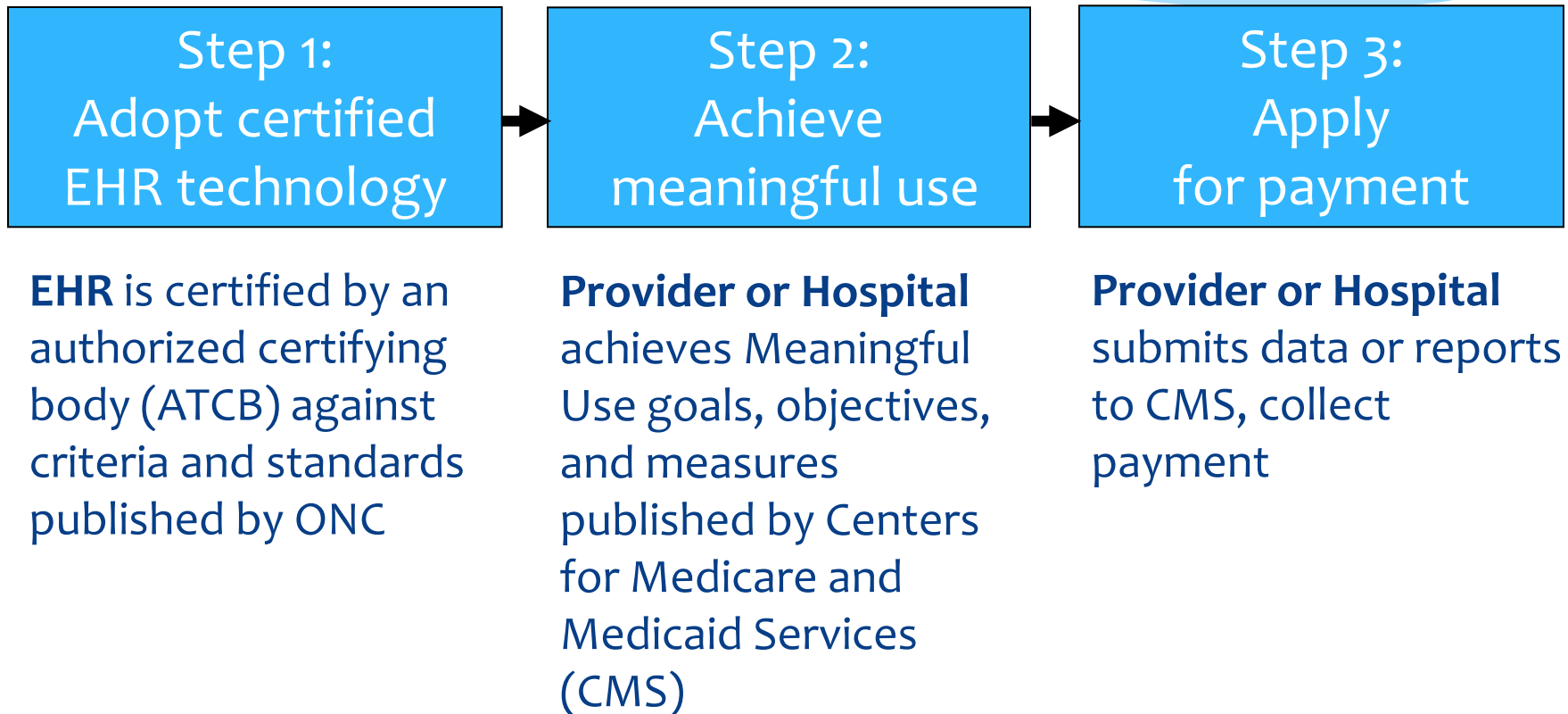
Federal Definitions of “Certified EHR Technology”

- * **Complete EHR:** able to perform, **at a minimum**, all of the applicable capabilities required by certification criteria adopted by the Secretary, and thereby, as providing eligible professionals or eligible hospitals with **the technical capabilities they need to support their achievement of meaningful use of certified EHR technology**
- * **EHR Module:** any service, component, or combination that can meet the requirements of at least one certification criterion adopted by the Secretary
- * **Certification:** ONC authorized process for complete EHRs or EHR modules required for eligibility for incentives

Why Certification?

- * Ensuring technology complies with standards
 - * ONC developed EHR criteria
 - * NIST wrote testing procedures
 - * ATCB's test technology
- * Establishes a baseline of functionality
- * Requires 100% compliance
- * Meant to provide assurance and remove barriers to adoption
- * Required to obtain incentives

Three Steps to the ARRA Incentive Money



The Paths to EHR Certification

- * Hospitals may wish to seek certification of their technology in these situations:
 - * They use self developed EHR technology to meet one of the ONC criteria
 - * They use older, uncertified vendor EHR technology
 - * They use certified vendor EHR technology, however, they have customized/modified the code for their facility
 - * They have a mixture of certified and uncertified EHR technologies
- * Certification is not needed if the hospital has adopted an EHR with “Complete EHR” certification, or a combination of certified EHR Modules covering 100% of the Meaningful Use criteria

The Paths to EHR Certification (cont.)

- * The “possession” rule from ONC, defined
 - * Complete vs. Modular EHR Certification
 - * Overlapping technology vs. substitution
- * Situations hospitals may find themselves in
- * Options to consider
 - * Modular vs. Complete EHR Certification

Assessment of Your Technology

- * Inventory all EHR components/software
- * Analyze if 100% of ONC criteria are covered (31 criteria for hospitals)
- * Is each technology certified by a vendor?
- * Any gaps? Develop a plan:
 - * Purchase certified technology
 - * Self-develop technology
 - * Assess criteria compliance

Assessment of Your Technology (cont.)

- * Resources to help:

- * NIST website: <http://healthcare.nist.gov/>
- * ONC website: <http://healthit.hhs.gov/>
- * ATCB's (See the list on the ONC website)

Building Your Team

- * Likely members
 - * CIO
 - * IT Analysts
 - * Departmental Users
- * Knowledge of systems and functionality is key
- * Separate certification team from MU team

The Testing and Certification Process— What to Expect

- * ATCB's have developed their own test scripts
- * Ensure compliance to test scripts
- * Practice equates to success
- * Testing typically conducted via web-demonstration
- * Retesting policies differ
- * Where are test results posted?

Frequently Asked Questions

- * Do I have to certify data source systems?
- * Do I have to certify all my interfaces?
- * Do I have to demonstrate integration of all my systems?
- * Is Security testing required for each certification?
- * Can I test incrementally as each technology is ready?

Thank You!

Q&A

For more information:

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