EHR Crystal Ball: The 2015 NPRM and Today's Policy Picture

Overview

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Agenda

- eHealth Initiative introduction
- Office of the National Coordinator for Health Information Technology (ONC) and their thinking
- Summary of major provisions
- Specific highlights
- Looking ahead to 2017 Edition

eHealth Initiative

- Independent, non-profit organization whose mission is to drive improvements in the quality, safety, and efficiency of healthcare through information and information technology.

- Represents all healthcare industry stakeholders. Working with its membership, eHI advocates for the use of health IT that is practical, sustainable and addresses stakeholder needs, particularly those of patients. www.ehidc.org.

ONC's Purpose for Action

- Revised timeline by CMS announced 12/2013
  - Stage 3 begins 2017
  - Allows for more analysis, development time, etc.
- More frequent rulemaking addresses time of updates and electronic health record (EHR) development and deployment
  - Current regulatory cycles not ideal
  - Not aligned with technology advancements and standards balloting cycle timelines
  - Strategic planning becomes difficult

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Approach enables ONC...

- **More nimble to stakeholder feedback and support programs utilizing health IT**
- **Increased frequency allows for improvements**
- **Allows ONC to signal industry course of action**

  - Interoperability
  - Information exchange
  - Quality improvement
  - Patient engagement
  - Patient safety

- **Smaller requirements that are easier to integrate**

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Voluntary Certification

- 2014 Edition – EHR technology recertification is not required for customer participation

- Participants are not required to upgrade to 2015 Edition certification to meet definition of "Certified EHR Technology"

- Advanced notice of potential requirements for 2017 Edition certification criteria (for Stage 3)

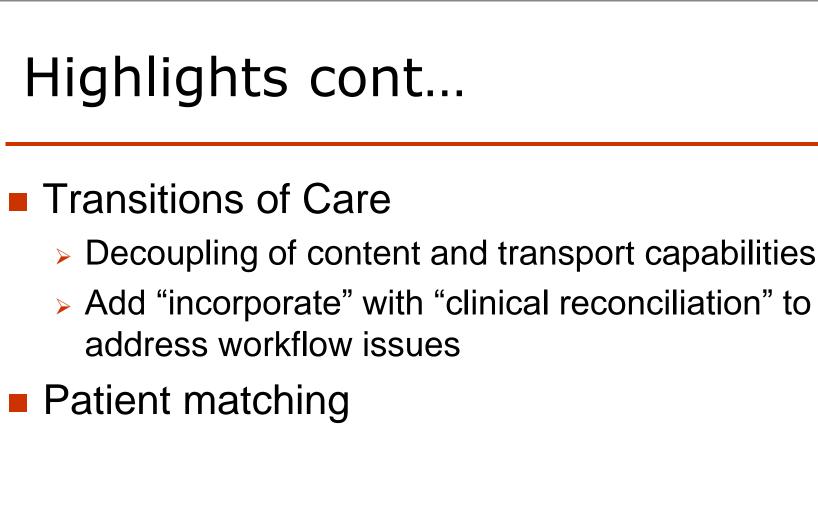01/01/2011

Introduction of "Gap Certification"

- **Capabilities certified in 2015 Edition may qualify for "gap certification"**
  - If remain unchanged in 2017 Edition
  - Do not need to be fully retested and recertified
  - ONC-Authorized Certification Bodies (ACB) has a choice to provide gap certification
  - Availability and scope will depend on final rulemaking for 2017 Edition

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What is included?

- Adopt 60% of 2014 Edition EHR certification criteria

- 2015 Edition addresses
  - Clarifying revisions
  - Standards updates
  - Restructuring
  - New certification criteria

Highlights

- Discontinue "Complete EHR" certification concept

- View/Download/Transmit (V/D/T) – enables patient to choose where health information is sent

- Split Computerized Provider Order Entry (CPOE) – 3 criteria based on order types
  - Medications
  - Laboratory
  - Radiology/Imaging

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Highlights cont…

- **Transitions of Care**
  - ➢ Decoupling of content and transport capabilities
  - ➢ Add "incorporate" with "clinical reconciliation" to address workflow issues
- **Patient matching**

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Looking ahead......2017 Edition

- Clinical Quality Measures (CQMs)
  - Readiness of industry to adopt HL7 Health Quality Measures Format (HQMF)
- Revisit V/D/T
  - Images and non-text data
- Adoption of Blue Button + capabilities
- Duplicate patient records
- Other health IT "HIT Modules"

What's next

- Deadline for comments: Monday, April 28th
- www.regulations.gov

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