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National Leadership for Health Information Technology EHR Association Position Paper

The Electronic Health Record (EHR) Association supports the goals and achievements to date of national leadership for health information technology (health IT) in the US. In particular, the Healthcare Information Technology and Standards Panel (HITSP) and the Certification Commission for Health Information Technology (CCHIT) have played key roles in providing national technical leadership for health IT. These entities have made significant progress in developing harmonized interoperability specifications based on consensus standards and fostering their adoption in EHR products certified and released in 2006, 2007 and 2008 and due to be certified and released in 2009.

The federal government should commit the resources and policies necessary to encourage the adoption by care providers large and small of such interoperable HIT solutions. This is a major opportunity to be seized to achieve the goal of the widespread, interoperable exchange of health information throughout the US.

For nearly five years, the public and private sectors have invested hundreds of millions of dollars and resources to help carry out these initiatives. In addition, many states have aligned their health IT initiatives with the goals and work of these initiatives to foster interoperability of health information. As the new administration and Congress begin their work, it is critically important that these initiatives do not veer off course. We anticipate that a significant change in direction could set back the progress on interoperable health IT back at least three years thus impacting timely and much-needed improvements in safety, quality and efficiency. Specific recommendations regarding each organization are identified below.

Healthcare Information Technology Standards Panel (HITSP)

HITSP is the product of an original contract from the Office of the National Coordinator in 2005 to harmonize standards, the *Standards Harmonization Collaborative*. HITSP brings together stakeholders from across the healthcare community who use and develop health IT products, as well as government agencies and standards setting organizations to review and recommend useful, harmonized standards to advance interoperability across healthcare. The harmonization of standards for healthcare enables interoperability of disparate applications in an accurate, private, and secure manner to support the efficient, effective sharing of information to improve delivery of healthcare and public health. HITSP is administered by the American National Standards Institute (ANSI) in cooperation with the Healthcare Information and Management Systems Society (HIMSS), the Advanced Technology Institute (ATI), and Booz Allen Hamilton.

In conducting standards harmonization, HITSP receives use cases and harmonization requests from the ONC and AHIC. HITSP then develops interoperability specifications supporting the use cases. Interoperability specifications enable health IT products to effectively exchange health information. Examples of interoperability specifications released to date include such areas as biosurveillance, consumer empowerment and electronic health record exchange. The interoperability specifications from HITSP are included in criteria for CCHIT's certified health IT products.

EHR Association Position: The EHR Association strongly recommends that the Secretary supports the continuance of the governmental role in support and funding of the public/private Standards Harmonization organization, and the process of standards review and harmonization currently provided by HITSP. We also recommend a key governmental role in recognizing those harmonized standards resulting from the Standards Harmonization Process.

This complements the current private sector process of standards development through the many successful Standards Development Organizations (SDOs) such as HL7, DICOM and others that have a long history of convening subject matter experts by topic to develop standards that feed the Standards Harmonization process.

The EHR Association strongly supports the work of HITSP as the organization to oversee this critical role of Standards Harmonization and Implementation Specifications. Starting over with a different organization and/or process could set the work on interoperable health IT, and the resulting improvements in safety, quality and efficiency, back at least three years.

The EHR Association member organizations employ subject matter experts who have made standards development in healthcare their professional missions, providing thousands of volunteer hours to many SDOs. The EHR Association members have joined HITSP, the Standards Harmonization body, to ensure that our extensive implementation experience with interoperability is brought to bear on these deliberations and will continue to contribute these specialized resources to support of this process going forward.

Certification of Healthcare Information Technology

Since its establishment in 2004 as an independent, nonprofit organization in response to the national goal of all Americans having interoperable electronic health records (EHR) by 2014, CCHIT has become a recognized certification organization by HHS and healthcare providers throughout the US. CCHIT has certified over 150 EHR products for both ambulatory and inpatient care settings. The certification work of CCHIT aims to make EHR selection more efficient by ensuring a baseline of functionality, standards compliance and interoperability among products.ⁱ

Recognizing the achievements to date of the certification effort, federal and state governments, along with health IT collaboratives throughout the US, are calling for the use of certified technologies. For example, Massachusetts recently passed a law requiring hospitals and certain other organizations to use interoperable electronic health applications. These systems must be CCHIT Certified. Within the federal government, the Centers for Medicare and Medicaid Services' (CMS) Physician Quality Reporting Initiative (PQRI), an incentive program for healthcare providers that participate in a voluntary quality reporting program, requires participants to adopt a qualified EHR, such as a product that has been certified or is capable of performing three key functions.ⁱⁱ

The certification process has been a collaborative effort with subject matter experts from vendors, healthcare providers, insurance carriers, academics and other stakeholders contributing thousands of hours to CCHIT Workgroups and efforts. This ensures that broad, extensive knowledge and implementation experience is brought to bear on these efforts.

EHR Association Position: The EHR Association supports the purpose and work of certification efforts focused on increasing adoption of interoperable EHRs. Interoperability among healthcare providers can allow for significant improvements in safety, quality of care and efficiency. Aligning on the HITSP harmonized set of interoperability standards, then driving the adoption of those standards through certification can assist with achieving more interoperability and the associated benefits.

We support the current CCHIT certification process and applaud improvements to ensure that vendor development timetables are considered and that a balanced set of requirements are chosen. We support the certification timeframes being set by the Certification body and recommend that any proposed legislation align on these timeframes. We recommend improvements in the efficiency and cost effectiveness of the process. In support of achieving interoperable EHRs and adoption, we believe that

additional certification criteria should primarily focus on interoperability. Strict attention should be paid to selecting HITSP Interoperability Specifications that are market tested. In addition, all aspects of the process need to be reviewed to ensure predictability and adequate time for stakeholder participation. These improvements will further streamline the certification process, reducing product development costs for health IT suppliers and implementation costs for our customers. These measures will help foster innovation while supporting the overall mission and goals of a health IT certification process.

The certifying body should be accountable on a regular basis to the public/private entity created to provide leadership on the strategy to drive interoperability of healthcare IT across the nation to ensure the process and outcomes are aligned with the overall goals of certification.

Federal Coordination for Health Information Technology

In 2004, Executive Order 13335 established the Office of the National Coordinator, to be led by the National Coordinator for Health Information Technology (National Coordinator). Appointed by the Secretary, the National Coordinator was charged with overseeing the development of a nationwide health information technology infrastructure; developing and maintaining the implementation of a strategic plan for health IT; and addressing such issues as adoption of health IT, privacy and security, and the cost and benefits of interoperable health IT.

Under the direction of the National Coordinator, the ONC provides counsel and leadership for HHS' health IT activities and achieving a nationwide health information infrastructure. The many duties of the ONC include oversight over federal HIT activities and overseeing various contract and grants.

EHR Association Position: The EHR Association supports the codification of the ONC, or similar organization, within HHS. Establishing such an organization, through law will help ensure continued coordination of Federal HIT activities and support and guidance for health IT activities throughout the US. Such leadership is essential to achieving the widespread use of interoperable health IT and the resulting benefits.

Public/Private Health IT Leadership

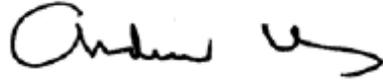
Background: Since its federal charter in 2005, AHIC has played an instrumental role in advancing the interoperability of health IT throughout the United States. Facilitated through the ONC, AHIC served as a public/private collaborative to make recommendations to the Secretary of Health and Human Services (HHS) on how to accelerate the adoption of interoperable health IT. Over the past three years, AHIC has provided use cases to the Health Information Technology Standards Panel (HITSP) and oversaw the development and completion of a wide variety of "Interoperability Specifications" concerning health IT and consumer empowerment, chronic care, electronic health records, biosurveillance and quality. Since its inception, AHIC was conceived to be an interim organization that would sunset by December 2008 at which time a new public/private partnership would be established.

EHR Association Position: We recommend that the Secretary contract with a public/private entity to provide leadership on the strategy to drive interoperability of health IT. We recommend that such an entity be structured to influence public policy that supports the interoperability strategies. We believe that this entity should be partly funded by the government and partly funded by the private-sector, with appropriately balanced governance and decision-making among the stakeholders. We also recommend that the HIT suppliers (vendors), who have by far the most experience in developing and installing HIT systems, hold at least one position on the entity.

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About HIMSS EHR Association

HIMSS EHR Association is a trade association of Electronic Health Record (EHR) companies that join together to lead the health information technology industry in the accelerated adoption of EHRs in hospital and ambulatory care settings in the US. Representing a substantial portion of the installed EHR systems in the US, the association provides a forum for the EHR community to speak with a unified voice relative to standards development, the EHR certification process, interoperability, performance and quality measures, and other EHR issues as they become subject to increasing government, insurance and provider driven initiatives and requests. Membership is open to HIMSS corporate members with legally formed companies designing, developing and marketing their own commercially available EHRs with installations in the US. The association, comprised of more than 40 member companies, is a partner of the Healthcare Information and Management Systems Society (HIMSS) and operates as an organizational unit within HIMSS. For more information, visit <http://www.himsshra.org>.

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- ⁱ “Report on Activities and Progress.” Certification Commission for Health Information Technology (CCHIT). September 16, 2007. Available at: <http://www.cchit.org/files/Presentations/CCHITReportActivitiesProgress200709.pdf>. Accessed on August 25, 2008.
- ⁱⁱ “Physician Quality Reporting Initiative (PQRI)”. American Psychiatric Association. Available at: <http://www.psych.org/MainMenu/PsychiatricPractice/MedicareMedicaid/PQRI.aspx>. Accessed on August 25, 2008.