Membership Survey

Insights Into Issues and Expectations for 2008 Interoperability Requirements Proposed by the Certification Commission for Health Information Technology (CCHIT)
EHRVA Survey Results Provide Important Insights into Issues and Expectations for 2008 Interoperability Requirements Proposed by the Certification Commission for Health Information Technology (CCHIT)

The HIMSS EHRVA (Electronic Health Record Vendors Association) is a trade association committed to lead the health information technology (HIT) industry in the accelerated adoption of EHRs in U.S. hospital and ambulatory care settings.

The association (www.himssehrva.org) is comprised of more than 40 member companies and represents a substantial portion of the installed EHR systems in the U.S. today. The EHRVA provides a forum for the vendor community to speak with a unified voice relative to standards development, the EHR certification process, interoperability, performance and quality measures, and other EHR issues. This is in direct response to increasing government, insurance and provider driven initiatives and requests. EHRVA recently surveyed its membership to assess EHRVA expectations and readiness for interoperability requirements already being considered for 2008 CCHIT certification.

The purpose of the survey was to determine if EHRVA members have adequate resources and plans in preparation for this milestone certification. The survey results were presented at the August EHRVA all membership meeting.

Respondent profile
Twenty eight members, or approximately 70% of the EHRVA membership, responded to the survey, with more than half representing the ambulatory EHR market space.

Survey highlights
The survey indicated that the ERHVA membership is aware of the impact that CCHIT and Health Information Technology Standards Panel (HITSP) have on their product development activities. Overall, the survey results suggest that EHRVA members:

- Are knowledgeable about HITSP specifications (76% of respondents)
- Expect ASTM/HL7 Continuity of Care Document (CCD) to be in the next round of CCHIT certification (76% of respondents)
- Understand that the underlying technology used to create CCD (i.e., HL7 Clinical Document Architecture (CDA)) can be leveraged to implement other pending clinical content requirements such as CMS electronic claims attachments (72% of respondents)
- Have limited experience implementing Integrating the Healthcare Enterprise (IHE) profiles (32%-48% of respondents)
- Have identified key areas where the EHRVA could help members prepare for 2008 certification, including CCD education, common interoperability testing tools and shared testing environments.

According to Don Schoen, CEO for MediNotes Corporation and Chair of EHRVA, “I think it is fair to say that the membership agrees there really should be no requirement for companies to learn, and more importantly to maintain, two different standards dealing with the same clinical content. Also, the harmonized CCD standard would allow vendors to provide the necessary ambulatory content when the electronic claims attachment final rule is released in the near future by CMS. Since at least 75% of total software lifecycle costs are associated with maintenance, minimizing software development and maintenance costs in this area can directly benefit our cost-sensitive ambulatory EHR customers.”
Specific survey results can be found on the EHRVA internet site (www.himssehrva.org). Below are some of the highlights:

In response to the question “My company plans to…”, the membership responded as follows:

- Considers the effort to implement CCD complementary to future HL7 CDA requirements, such as HIPAA eClaims attachments Final Rule. The response distribution is as follows: Strongly Agree (10), Agree (15), Neutral (5), Strongly Disagree (0).
- Anticipates that CCD will be required for 2008 CCHIT Certification. The response distribution is as follows: Strongly Agree (12), Agree (13), Neutral (6), Strongly Disagree (0).
- Reviewed HITSP spec to assess the potential product development necessary to meet CCHIT 2008 Certification. The response distribution is as follows: Strongly Agree (14), Agree (14), Neutral (6), Strongly Disagree (0).

In response to the question “What EHRVA sponsored initiatives would be most helpful to my company to prepare for CCHIT 2008 Certification?”, the membership responded as follows:

<table>
<thead>
<tr>
<th>Initiative</th>
<th>Overall Ranking</th>
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<tbody>
<tr>
<td>Education sessions on implementing CCD, including tools, templates and hands-on demonstrations</td>
<td>1</td>
</tr>
<tr>
<td>Development of common tests that can be promoted and recognized by CCHIT for interoperability certification testing</td>
<td>2</td>
</tr>
<tr>
<td>Sessions on how to implement IHE profiles and/or open-source software, test tools that would satisfy HITSP requirements</td>
<td>3</td>
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<tr>
<td>Coordinate test environments among member companies or other resources (such as IHE) for member testing of interoperability specification</td>
<td>4</td>
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<tr>
<td>Ways to leverage CDA &amp; CCD training for other upcoming government requirements, such as eClaims attachments</td>
<td>5</td>
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<tr>
<td>Develop common transport methods to share CCD between EHRs that are not part of a RHIO (e.g., point-to-point)</td>
<td>6</td>
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<tr>
<td>Provide Wikis or other information sharing tools for EHRVA members implementing CCD / HITSP specs</td>
<td>7</td>
</tr>
<tr>
<td>Marketing communications that can inform my customer about CCHIT, HITSP and how ERHVA is collaborating to provide interoperability solutions</td>
<td>8</td>
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As this response summary clearly indicates, a majority of members have considered HITSP specifications. Moreover, they anticipate being included on some level in the next round of interoperability certification requirements. Also, a majority of members expect CCD to be included in that next round as well. The HITSP interoperability specifications provide an opportunity to accelerate the availability of medical summaries between inpatient and outpatient settings. This has gained an increased focus due to the recent changes in Stark Safe Harbor rules for EHR donations. EHRVA recently sent an open letter (www.himssehrva.org/ASP/statements.asp) on this matter to the Office of the National Coordinator (ONC) and CCHIT.

“The survey reinforced our customers’ feedback relative to providing interoperable solutions that address their everyday needs. As a follow-up, we reinforced that it should be a high priority for ONC to address the implementation of CCD compatible medical summaries (e.g. XDS-MS) that support transitions of care without requiring a regional health information exchange (RHIO) to be in place”, stated Dan Michelson, Chief Marketing Officer, Allscripts.

The members also identified interoperability testing as a critical area for EHRVA to address, suggesting that common test tools and testing environments, such as those championed by IHE, be promoted and recognized by CCHIT. “Vendors recognize that interoperability testing is more difficult than testing EHR functionality, and can be extremely costly to both CCHIT and to vendors if it does not leverage existing best practices such as IHE,” stated Jack Smyth, President and CEO of Spring Medical Systems. He added, “Interoperability testing is more than checking the content of a specification. This testing must ensure that a requirement can be implemented in a plug-and-play manner, which includes precisely specifying things like interoperability transport standards (e.g. XDS). Leveraging the work of IHE, with its 10-year track record of global testing interoperability solutions, makes sense.”

Some key initiatives that members are targeting as a result of the survey include:

- The development of a CCD Quick Start Guide to accelerate the development of CCD-based interoperability solutions consistent with HITSP specifications. This is expected to launch in the fourth quarter, 2007.
- The development of test-beds to support interoperability testing among EHRVA members, using the IHE and NIST initiatives as models.
- The encouragement of broader member participation around IHE interoperability profiles that are used extensively in HITSP specifications, including the awareness of the open-source solutions available.

Despite criticism of little or no progress, the EHR vendor community would prove otherwise with both the development activity and key implementations already in place.

According to Hugh Zettel, EHRVA Co-chair and Director of Government and Industry Relations for GE Healthcare, “The EHR community is stepping up to meet the needs of the marketplace and real progress is occurring. Now is the time for the other stakeholders to follow-through. The results of the survey are consistent with our goals with respect to the EHRVA Interoperability Roadmap, and we will continue to focus on those high value interoperability solutions that our customers are demanding. EHRVA members have invested substantial effort in HITSP, CCHIT and related processes, and want the market to know results are beginning to appear in commercial product offerings. With the right market incentives for providers, these efforts can accelerate EHR adoption.”