NPRM Request for Additional Comments Certification and Certification Criteria for Other Health Care Settings

HITPC Certification & Adoption Workgroup April 13, 2012

Larry Wolf, Kindred Healthcare

The NPRM Request

• Whether we should consider adopting certification criteria for other health care settings
• Specify the certification criteria that would be appropriate
• Experience of CCHIT certification programs
• The benefits a regulatory approach would provide
• Whether the private sector could address
Other Health Care Settings

- Post-Acute Care –
  Healing, Rehab and Recovery
  - Long-Term Acute-Care Hospitals
  - Inpatient Rehab Facilities/Rehab Hospitals
  - Skilled Nursing Facilities (short-stay, rehab)
  - Home Health (short term)
  - Hospice (short term)
- Long-Term Care –
  Daily Living, Health Maintenance, Risk Management
  - Nursing Facility/Nursing Home
  - Home Health (longer term)
  - Assisted Living
  - Hospice (long term)
- Behavioral and Mental Health
  - Psychiatric Hospitals
  - Methadone Clinics
  - Group Homes & Halfway Houses

Common Characteristics

- Share care with eligible providers
- Typical length of stay in weeks or months not days
- Interdisciplinary care teams
- Range of physician presence
  (from on-site to remote, 24x7 to less than monthly)
- Variety of licensed and unlicensed staff
- Clinical services may come from 3rd-party providers
  (pharmacy, lab, imaging, dialysis, outpatient procedures, …)
- Required electronic assessments
- Distinct or non-existent quality measures
Required Electronic Assessments

- **Nursing Facility**: Minimum Data Set (MDS 3.0)
- **Home Health**: Outcome and Assessment Information Set (OASIS)
- **Rehab Hospitals**: Inpatient Rehab Facility-Patient Assessment Instrument (IRF-PAI) / Functional Improvement Measure (FIM)
- **Prototype Multi-Setting**: Continuity Assessment Record and Evaluation (CARE)

Additional Health Care Providers

Additional Providers Maintaining Medical Records
- Pharmacy
- Immunization Clinics
- Dialysis Center
- Infusion Center
- Therapist / Certified Outpatient Rehab Facility
- Clinical Laboratory (CLIA, ACLA)
- Camp/School
- Wellness Programs
- Correctional Facility
- Non-Medicare/Non-Medicaid Provider
Existing EHR Related Software

- Setting specific products
  - Unique functionality and workflow
  - Multi-function systems
  - Disconnected niche modules
- Adaptation of hospitals and outpatient software
- Varying degrees of implementation

Certified EHR Technology – 2014 Edition

1. Includes patient demographic and clinical health information, such as medical history and problem lists; and

2. Has the capacity:
   i. To provide clinical decision support;
   ii. To support physician order entry;
   iii. To capture and query information relevant to health care quality;
   iv. To exchange electronic health information with, and integrate such information from other sources; and
   v. To protect the confidentiality, integrity, and availability of health information stored and exchanged
Minimum
iv. To exchange electronic health information with, and integrate such information from other sources; and
v. To protect the confidentiality, integrity, and availability of health information stored and exchanged

- Necessary for all settings
- A responsible partner in coordinated care
- Ensure patient identity
- Ensure provenance
- Ensure privacy & security
- Ensure standards-based exchange

Base EHR
i. To provide clinical decision support;
ii. To support physician order entry;
iii. To capture and query information relevant to health care quality;
   • Not all of 2014 Edition criteria apply to all settings
Core + Menu (Setting Specific)
Comprehensive (Setting Specific)

Software Certification & EHR Models

- ONC-ATCB – Modular Certification
  - Potential for a common core
- CCHIT – Comprehensive
  - LTPAC SNF/Home Health
  - Behavioral Health
  - Specialized needs of these settings

- HL7 EHR Functional Model
  - Electronic Health Record-System (EHR-S) Functional Model (FM)
- HL7 EHR Profiles
  - Vital Records
  - Pharmacist/Pharmacy Provider
  - Records Management and Evidentiary Support
  - Long Term Care
  - Clinical Research
  - Child Health
  - Behavioral Health
Adopting Certification Criteria

Pro
• Basis for evaluation in software acquisition process
• Can support eligible provider (EP & EH) Meaningful Use
• May facilitate broader adoption of standards-based exchange
• More comprehensive use of content and vocabulary standards
• May encourage innovation (new ways to achieve criteria)

Con
• May create an unfunded mandate
• May discourage innovation
• Coding to the minimum
• False sense of security
• Barrier to market entry

CCHIT Certification Program Experience

• Broad participation to define Behavioral Health and Long-Term/Post-Acute Care
• Defines a setting specific, comprehensive EHR
• Also offer ONC-ATCB Certification

Product Type
• Ambulatory EHR
• Inpatient EHR
• Emergency Department EHR
• Long Term Post Acute Care EHR
• ePrescribing Module

Additional Certification
• Behavioral Health (2) (includes ONC-ATCB Ambulatory Complete EHR)
• Cardiovascular Medicine (10)
• Cardiovascular Medicine with Advanced Reporting (9)
• Child Health (33)
• Dermatology (3)
• Enterprise (3)
• Home Health (2) (includes ONC-ATCB Hospital Module)
• Skilled Nursing Facility (3) (includes 2 with ONC-ATCB Hospital Module)
• Women's Health (2)
<table>
<thead>
<tr>
<th></th>
<th>Government</th>
<th>Private</th>
</tr>
</thead>
<tbody>
<tr>
<td>Voluntary</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manditory</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>