

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

2

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

3

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)

4

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

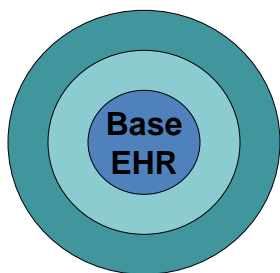
5

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

6

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

7

Proposed EHR Model

Micro Minimum Kernel

- 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

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)

8

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

9

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

10

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)

11

Approach

	Government	Private
Voluntary		
Mandatory		