



Allscripts Stimulus Series

HITECH Certification 101



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One of the central criterion for receiving HITECH Stimulus funds is to use certified EHR technology. Previously, certification had been performed by a single body (CCHIT) according to standards they also developed. Under the HITECH program, however, certification will be conducted by multiple accredited certification bodies, with different classes of certification possible. To help understand these changes in a practical sense, we are pleased to present this white paper: "HITECH Certification 101."

Background

By now, most physicians practicing in an ambulatory environment are familiar with the HITECH incentive program, which will reward clinicians who prove that they have met a certain set of criteria, as outlined under the Meaningful Use Incentive Rule by the Department of Health and Human Services (HHS). To satisfy these criteria and be deemed a "meaningful user" of Electronic Health Records (EHR), a provider must prove compliance with – at the highest level – three main criteria: use of a certified electronic health record, which includes ePrescribing functionality; connectivity to other healthcare professionals for the exchange of relevant clinical information; and the submission of clinical quality reports on the care being delivered to their patients. Each of these was intentionally left fairly vague when drafted by Congress, and it was left to HHS to extrapolate the more detailed regulations pertaining to HITECH. The Office of the National Coordinator for Health IT (ONC), an agency within HHS, was responsible for outlining exactly what was meant by the concept of EHR certification under this program.

On June 24, 2010, ONC issued the final rule on the establishment of the Temporary Certification Program for Health IT. This Rule announced the certification criteria that EHR technology is now required to meet to be deemed usable within the Meaningful Use incentive program, with utilization of certified products then enabling eligible providers to eventually receive HITECH incentive payments (assuming other requirements are satisfied).

Types of Certified Systems

Under the Temporary Certification rule, which will be in effect for the first two years of the HITECH program (2011 and 2012), there are three types of EHR systems that are eligible to be tested and certified as compliant with the Stage 1 Meaningful Use criteria. These three categories are **Complete EHRs**, **EHR Modules**, and **Integrated EHR Modules** (often called "bundles"). Because the concepts of modular and bundled certification are new, however, and comprehensive certification is not entirely analogous with the prior CCHIT certification program, it is important to clarify the options and responsibilities related to certification under the program.

Complete EHRs

Complete EHR systems are those that have technology in place to perform all of the tasks required by the certification criteria established by the Secretary. This means that an EHR system that has been granted Complete EHR status can be used without any other system to help a physician achieve the Meaningful Use incentives – no other functionality must be added through additional systems to satisfy all of the required criteria. The certification criteria include, among other things, the ability to maintain an up-to-date problem list, record chart vital signs, incorporate lab test results, and report specific quality measures. Additionally,



Complete EHR systems may very well have the ability to perform tasks beyond those addressed in the certification criteria.

EHR Modules

In some instances, a provider may already employ certain health IT functionality within their practice, such as ePrescribing, and they may want to keep using that as they simultaneously expand their use of other systems. Additionally, some clinicians may have a preference for specialty-specific functionality within their efforts to demonstrate Meaningful Use of Electronic Health Records, such as in the area of clinical decision support. These preferences have been partially solved through the creation of the Modular EHR certification status. An EHR Module is any service or component that can meet at least one of the criteria mapped out by the Secretary within the Meaningful Use incentives. While an EHR Module allows for customization and the combination of multiple systems, it cannot be used on its own to help a physician achieve the Meaningful Use incentives – other functionality must be added through the use of other systems to satisfy all of the required criteria in combination.

Modular Integration – EHR Bundling by Vendors

Multiple EHR Modules – as certified individually – can be combined by technology developers into what has come to be known as a “bundle” of EHR Modules. A “bundle” thus certified has the same status as a “complete” system.

Bundling requires certifying multiple EHR Modules that have been integrated and can demonstrate compatibility with each other. It is expected that modular integration will be a popular option in the Meaningful Use Stage 1 period because it affords an expanded flexibility from the Complete EHR option. Thus, various pre-coordinated “bundles” of EHR Modules are expected to be certified using a process similar to testing as a Complete EHR.

Assembling Modules by EPs

EPs have the option of assembling certified modules from one or more vendors and using them as a collection to demonstrate Meaningful Use. In this scenario, EPs do not have to integrate, test or certify the independent modules as a bundled system. What they must do is **attest** that the collection covers all the required functionality to demonstrate Meaningful Use.

This approach offers the greatest flexibility to EPs, but it comes at the cost of having to ensure that independent modules (developed in all likelihood by separate vendors) will function efficiently together. It would be necessary for the EP to arrange for support from each vendor in a potentially complex technical and operational environment.

How Does Certification Affect You?

The general purpose of EHRs is to improve efficiency within a practice – and ultimately, entire healthcare communities – by helping providers increase their efficacy, reduce costs and deliver improved outcomes. Because there has been a wide disparity in the types of products that were called Electronic Health Records in the past and healthcare professionals used them in many varied ways, the HITECH certification program seeks to reduce market confusion as to which health IT products deliver the true functionality of an EHR by offering a certification program. Ultimately, within the Meaningful Use incentive program, if you employ a Complete EHR or a bundling of Modular EHRs in your efforts to demonstrate Meaningful Use, you are well on your way to successfully earning the incentive payments. The list of certified EHR products will be posted on ONC’s web site as they complete the certification process.



A Useful Analogy:

	Electronic Health Records Example	Automobile Example
"Complete" Certification	You buy a Complete EHR from Allscripts, using the product on its own to satisfy the requirements of meeting Meaningful Use. No other system is used in this process.	You purchase a pre-inspected car from a dealer. You take a driving test to demonstrate Meaningful Use of the inspected car.
"Modular" certification	You install an EHR module that has been certified under modular certification. You add another and another as necessary to – in total – be able to satisfy the Meaningful Use requirements. In your attestation about Meaningful Use, you indicate that all of the modules you used were certified. You do not have to have a "local" or "site" certification of the assembled modules.	You buy wheels from one place (a certified "module"), an engine from another (second certified "module") and headlights from another (third certified "module"), and you put them together to form a functioning car. You aren't required to have an inspection of the assembled parts – you just need to attest to the fact that each of the parts in use is certified.