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The Honorable Michael J. Kussman, MD
Under Secretary for Health
Veterans Health Administration
U.S. Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

The Honorable S. Ward Casscells, MD
Assistant Secretary of Defense (Health Affairs)
1200 Defense Pentagon
Washington, DC 20511-1200

Dear Dr. Kussman and Dr. Casscells:

I am pleased to submit the Healthcare Information and Management Systems Society (HIMSS) response to the *Joint --DoD-VA Inpatient EHR Request for Information*, which was posted on November 29, 2007 (**Solicitation Number W81XWH-08-RFI-EHR**). HIMSS is the healthcare industry's membership organization exclusively focused on providing global leadership for the optimal use of healthcare information technology (IT) and management systems for the betterment of healthcare. HIMSS represents more than 20,000 individual, 330 corporate members, and 47 chapters nationwide. HIMSS seeks to shape healthcare public policy and industry practices through its educational, professional development, and advocacy initiatives designed to promote information and management systems' contribution to quality patient care.

HIMSS strongly supports the interoperable exchange of healthcare information to promote better quality and lower cost healthcare. We proudly leverage the collective expertise of our members to ensure that our response reflects the broadest level of industry experience. The viewpoints of our Enterprise Information Systems Steering Committee, Electronic Health Record Vendors Association, and individual members, along with their industry colleagues, ensure that HIMSS fulfills its requirement to offer a coordinated voice to the national discussion on these important healthcare issues.

To that end, HIMSS appreciates being able to focus our comments on interoperability, standards harmonization, certification of EHR-products, and lessons learned from the HIMSS Davies Award Program.

Interoperability

As you know, healthcare delivery in the United States is a complex and costly process. Thought leaders throughout the healthcare industry agree that the quality and cost effectiveness of care delivery will be greatly enhanced by the timely, accurate, and secure exchange of healthcare data between providers. To achieve that end, over the past decade, industry efforts have made great strides in establishing processes for agreement on common interpretation of industry standards.

Integrating the Healthcare Enterprise

An interoperability initiative that is worth noting is the Integrating the Healthcare Enterprise (IHE) Initiative. IHE is a global initiative that creates the framework for passing vital health information seamlessly – from application to application, system to system, and setting to setting – across multiple healthcare enterprises. IHE brings together healthcare information technology stakeholders to implement standards for communicating patient information efficiently throughout and among healthcare enterprises by developing a framework for interoperability. Because of its proven process of collaboration, demonstration and real-world implementation of interoperable solutions, IHE is in a unique position to significantly accelerate the process for defining, testing and implementing standards-based interoperability among electronic health records systems.

Under the leadership of HIMSS and the Radiological Society of North America (RSNA), IHE began in November 1998 as a collaborative effort to improve the way computer systems in healthcare share critical information. IHE includes medical specialists and other care providers, administrators, standards organizations, IT professionals, and vendors.

Systems engineers from leading health information technology organizations gather annually around the world to test the ability of their applications to share patient data within and across hospitals and healthcare systems. The IHE North American Connectathon featured more than 400 engineers testing over 150 systems from 80 organizations. Initiatives in the U.S. and around the world are striving to enable the exchange of EHRs across networks of providers to improve care delivery. Through IHE, the physician community and the healthcare IT industry are implementing standards-based solutions to make interoperable healthcare data sharing possible.

IHE took a major step in its evolution as an international organization by adopting in October 2007 the IHE Principles of Governance. This document, unanimously approved by the IHE Strategic Development Committee, establishes IHE International as an association comprised of many member organizations. The IHE International Board also will take the necessary legal steps to form a non-profit corporation by March 2008. More information on the value of IHE to the international standards harmonization effort is available at www.ihe.net.

Also, in preparing for an in-patient EHR, HIMSS recommends DoD and VA review the work of the HIMSS Electronic Health Record Vendors Association (EHRVA). The EHRVA consists of EHR vendors who address national efforts to create interoperable EHRs in hospitals and ambulatory settings. HIMSS EHRVA operates on the premise that the rapid, widespread adoption of EHRs will help improve the quality of patient care and the productivity of the healthcare system.

Of particular note, in October 2006, HIMSS EHRVA members developed an *Interoperability Roadmap*, which may be of use to your joint review. In developing the Roadmap, the EHRVA sought to “provid[e] a pragmatic, logical structure for implementation of [a common foundation of standards for interoperability].”¹ The *Interoperability Roadmap* includes the input from a broad range of stakeholders to develop four levels of specificity for EHR adoption and interoperability success, including the ability to 1) share care status information 2) share diagnostic results and therapeutic information 3) advanced clinical support and access control; and 4) collaborative care, active quality reporting, and health surveillance. The full Interoperability Roadmap is available at http://www.himssehrva.org/docs/roadmap_v2c.pdf

Healthcare Information Technology Standards Panel

The Healthcare Information Technology Standards Panel (HITSP) was established by HHS as the effective means for private/public sector stakeholders to harmonize a universal set of interoperability standards to enable portability of healthcare information to support an infrastructure that promotes higher quality healthcare and increased value for purchasers and consumers. HITSP has been in place for only two years, but has already demonstrated that it provides an effective process for evaluating and selecting standards to support health information exchange based on Use Case goals developed and agreed upon by virtually all healthcare industry stakeholders.

The HITSP process recognizes the need for U.S. healthcare standards to harmonize with international standards convergence efforts. Leveraging international efforts can help HIT suppliers bring interoperable systems to market more quickly in the U.S. A June 2007 HIMSS position² supports HITSP’s development of specifications that will allow HIT suppliers to focus their efforts and deliver interoperable solutions to their customers more quickly than if those suppliers are forced to support multiple, competing and duplicative standards.

As your process moves forward, HIMSS encourages DoD and VA to leverage HITSP initiatives on interoperability standards, which is supported by nearly 400 organizations representing consumers, healthcare providers, public health agencies, government agencies, standards development organizations, and other stakeholders. HITSP’s transparent, multi-stakeholder process is the right path to achieve greater levels of interoperability. Members work together to define the necessary functional components and standards – as well as gaps in standards – which must be resolved to enable the interoperability of healthcare data.

¹ *EHRVA Interoperability Roadmap*, Healthcare Information and Management Systems Society (HIMSS) Electronic Health Records Vendors Association (EHRVA), October 2006, www.himss.org

² *HIMSS Position Statement: Adoption of HITSP Interoperability Specifications*, Healthcare Information and Management Systems Society, June 2007, <http://www.himss.org/content/files/HIMSSPositionStatementHITSP2007.pdf>

Certification Commission for Healthcare Information Technology

As a co-founding organization and active supporter of the Certification Commission for Healthcare Information Technology (CCHIT), HIMSS strongly encourages DoD and VA to review CCHIT's certification requirements for in-patient EHRs. CCHIT is a recognized certification body for electronic health records and their networks, and an independent, voluntary, private-sector initiative. HIMSS members have worked with our industry colleagues over the past two years to provide input into the CCHIT requirements development process. The requirements for in-patient EHRs should serve as an excellent blueprint for your joint review.

Nicholas E. Davies Awards

HIMSS also recommends that the two departments review the Nicholas E. Davies EHR Awards Program to gain insight into achieving excellence in implementing EHR systems. The program recognizes healthcare provider organizations that successfully use EHR systems to improve healthcare delivery. The award was created by the Computerized Patient Record Institute- Healthcare Open Systems and Trials (CPRI-HOST) in 1994. The first three recipients of the Davies Organizational Award were recognized in 1995. Today management of the program continues under HIMSS, following the merger of CPRI-HOST and HIMSS in 2002.

The Davies Award is an excellent source of information on EHR adoption. The program is based on an evaluation framework that involves a two-step process, and modeled after the Baldrige Award. Applicants are asked for assessment and documentation of their progress based on four key areas including management, functionality, technology and overall value. The program objectives include, promoting the vision of EHR systems through concrete examples; understanding and sharing the documented value of EHR systems; providing visibility for high-impact EHR systems; and sharing successful EHR implementation strategies.

Since its inception in 1994, recognition has been awarded across three categories; organizational, ambulatory care, and public health. To date, the Organizational Davies Award has recognized 24 organizations for excellence in EMR-EHR implementation in the hospital-based setting. The 2007 winner is Allina Hospitals & Clinics in Minneapolis, Minnesota, which has connected 11 hospitals and 65 clinics in Minnesota and western Wisconsin.

Manuscripts of award applications for all Davies Organizational Award recipients are available at http://www.himss.org/ASP/davies_organizational.asp

Conclusion

HIMSS encourages DoD and VA to continue to work with other federal agencies and industry to ensure the “next steps” toward in-patient EHR are consistent with interoperability capabilities being outlined by HITSP and CCHIT. In the in-patient setting, military and veterans HIT requirements are very similar to requirements found in the civilian healthcare delivery setting. The functionality needs are the same with a greater stress on interoperability and data transport protocols. DoD and VA providers need to be able to identify patients, match these identities to existing documentation of allergies and pertinent history, enter appropriate documentation as care is rendered all throughout the treatment or medical evacuation chain, have the treatment record available for future clinicians, and ensure access and transfer to other facilities – DoD, VA, or civilian. Ensuring this type of functionality and interoperability has been the work of CCHIT and HITSP.

In addition, as a co-founder of IHE, HIMSS and our volunteer members appreciate the necessity of common parameters for developing healthcare information technology solutions. We encourage the joint review to engage with IHE North America to leverage the success of the ten-year-old initiative, which is bringing us closer to an end-state in healthcare delivery where disparate systems will achieve data sharing success by adhering to industry standards on healthcare vocabularies, messaging structures, and infrastructure guidelines.

Finally, through all these efforts, we are beginning to see the fruit of the industry’s labor on interoperability standards that will foster greater data sharing as patients seek care across the healthcare continuum. We all benefit from the resulting higher quality, more cost effective healthcare system that a Nationwide Health Information Network enables.

We look forward to further dialogue on this important public policy issue. If you have any questions, please feel free to contact Thomas M. Leary, HIMSS Senior Director for Federal Affairs at tleary@himss.org or 703.562.8814.

Sincerely,



H. Stephen Lieber, CAE
President/Chief Executive Officer

cc: Mr. Charles Campbell, Chief Information Officer, Military Health System
Mr. Craig Luigart, Chief Information Officer, Veterans Health Administration