



Agenda

Background

The [Health IT Standards Committee](#) is responsible for making recommendations to the National Coordinator for Health IT on standards, implementation specifications, and certification criteria for the electronic exchange and use of health information. In developing, harmonizing, or recognizing standards and implementation specifications, the Health IT Standards Committee will also provide for the testing of the same by the National Institute for Standards and Technology (NIST).

Implementation Workgroup

Update by Liz Johnson, Co-Chair Judy Murphy, Co-Chair

- Over the past several months, the Implementation Workgroup has been reviewing the HHS Certification Process.
- Liz Johnson presented the recommendations from the Implementation Workgroup as follows:
 1. Create a grid that shows the standards, certification criteria, testing methodology, and implementation guidance for each of the Stage 2 MU Measures, including the quality measures.
 2. Launch a unified HHS website that serves as the “single source of truth” for CMS’s MU and ONC’s certification programs.
 3. Establish a clear process to manage updates to specifications for MU measures and quality measures. Include version numbers and release notes for all updates so users can easily identify the most recent info and clearly understand what has changed since the last update. Indicate whether updates are mandatory or optional.
 4. Clarify and simplify requirements for possession and attestation to use of certified EHR technology:
 - Simplify rules for Provider
 - Simplify certification process for vendors and ONC-ATCBs
 - Consider requiring Providers to possess EHR technology certified only against those measures they use for MU
 - List the products included in a certified system by name and indicate the MU measures supported by each named product
 - Give Providers the flexibility to pursue any option:
 - A single complete certified EHR
 - An all-modular EHR comprised of certified modules
 - A complete certified EHR plus certified modules
 - Pieces of a complete certified EHR plus certified modules
 5. Build realistic software development and implementation timelines into regulatory requirements.
 - Align certification requirements with stage of MU.

- Establish effective dates at least 18 months following publication of NPRM for new certification criteria.
6. Publish the HHS process for conducting MU and Certification compliance audits.
 - Clarify how FAQ's will be used.
 - Identify the type of documentation the Provider will need.
 7. Publish the timeline for publication of the MU Stage 2 Measures, as well as for the associated proposed and final regulations and Certification Test methods.
 8. Revise individual certification criteria and test procedures based on specific comments.
 9. Create "scripts" with combined test procedures that permit the vendor to satisfy multiple certification criteria at once.
 - More input and analysis required
 - May be more appropriate for certain scenarios
 10. Publish more guidance for providers in order to clarify the difference between the Certification Criteria and the Meaningful Use incentives requirements.
 11. Identify pre-defined bundles of certification criteria and standards representing key EHR elements that make up a complete EHR, and reflect the way providers think about health IT.

Discussion on Implementation Workgroup Recommendations

- Regarding Recommendation #5, 18 months from when? The HIT Standards Committee seemed set on 18 months from the release of the NPRM for each stage.
- Liz Johnson emphasized that stakeholders are looking for as long a length of time available for implementers to complete the necessary processes of getting EPs and EHRs prepared for the next set of requirements.
 - HIMSS joined a coalition of organizations to recommend 18 months from the publishing of the final rule.
- Standards Committee members requested that the Implementation Workgroup include other recommendations regarding the Certification Process that were suggested prior to the Implementation Workgroup's efforts. We will be able to see what recommendations are included when the minutes for the November meeting are published.
- Liz Johnson also emphasized that stakeholders are clamoring for a Roadmap for certification prior to the start of MU Stage 3.
- Regarding Recommendation #2: Single Source of Truth Website will impact S&I Framework and CHPL program.

Updates from ONC

Doug Fridsma and ONC Staff

- [S&I and CDA](#)
- **Issue #1: Inadequate and Confusing Documentation**
 - CDA Document, Section, and Entry templates balloted by disparate organizations and scattered across more than a dozen documents.
 - C32 is a 5 page specification; its implementation information is spread across 8 different documents totaling hundreds of pages.

- **Solution: CDA Consolidation**
 - ONC fostered SDO and implementer collaboration to reconcile and consolidate all CDA Templates in to a newly balloted single Implementation Guide.
 - HL7 received and addressed more than 1000 comments – primarily from implementers
- **Issue #2: Lack of Implementer Tools and Resources**
 - One implementer described the toolset employed to wade through CDA based PDFs in order to understand requirements
 - Laser Printer
 - Yellow Highlighter
 - Legal Pad
 - We cannot require software engineers to digest hundreds of pages or to have a PhD in CDA in order to implement it – we must provide them with a better way to interface with the standard
- **Solution: Express CDA as a Computable Model**
 - ONC joined MDHT project supported by the VA and IBM Research
 - Paradigm changer – Documents → Models → Resources
- **Issue #3: Overly Complicated XML Schema**
 - The base standard requires even limited scope CDA instances to carry the full compliment of base CDA hierarchies, elements and attributes.
 - Implementers are unable to scope CDA down to the level of complexity relevant to a specific instance.
- **(Potential) Solution: Green CDA**
 - The definition of instance specific schemas which allow implementers to ‘leave behind’ the complexities of CDA which are not pertinent to their implementation.
 - Assignment of business labels (e.g. ‘code/@code’ → ‘Result Type’)
 - Transformable to canonical CDA to maximize compatibility
 - Natural extension of Consolidation and MDHT efforts

Tasks for ONC Staff

- Transitions to Care: Consolidated CDA is the correct course of action and move toward Green CDA.
- Models in S&I Framework and created internationally need to be considered
- Consider CIMI as an alternative to Green CDA.
- **Developing Modular Specifications for Transport Standards**
 - Model Driven Health Tools: Established by the VA.
 - Part of a worldwide phenomenon.
 - Getting the model right can result in real code being developed. Useful to use cases, testing scripts, etc.

- Should be seen as a tool for general Modular Specifications
- Task for ONC Team: Focus on Transport Standards, Payload, and Vocabulary Standards.
- Public Review
 - The deliverables have been available throughout the Project lifecycle at <http://modularspecs.siframework.org/>
 - Public calls have been held throughout the process to gather input from the stakeholder community
 - There will be a formal review period for 90 days after the conclusion of each phase.
- **Quality Measures and Standards** Avinash Shanbhag, ONC
- Goal: Strong MU eMeasure Ecosystem
 - Provide clear, and platform independent specifications
 - Simple to implement and comply with quality reporting requirement
 - Uses curated Value Sets based on HITSC recommendations
 - Integrates easily into vendor EHR
- Analysis of the CQM Standards
 - National Quality Forum (NQF) Quality Data Model (QDM)
 - *For Syntax and semantics*
 - HL7 Health Quality Measures Format (HQMF)
 - *Enabling eMeasure development and execution*
 - NQF Measure Authoring tool (MAT)
 - *Usability*
 - *Maintenance (Versioning)*
 - Certification of eMeasure
 - *113 NQF published eMeasure*
- Next Steps:
 - Complete analysis and determine next steps for
 - QDM
 - HQMF
 - MAT
 - Determine transition/implementation strategy for using recommended value sets
 - Focus on Stage 2 MU quality measures while ensuring long term improvements are made to eMeasure ecosystem

Discussion on Quality Measures and Standards Presentation:

- HIT Policy Committee and HIT Standards Committee Quality Workgroup needs to be revitalized. ONC will take the task of working with CMS to identify their charter and goals. ONC will report on the December HIT Standards Committee Meeting.
- **Innovation Imperative Initiative:** Wil Yu, ONC Innovation
 - Clarification that innovations associated with care delivery and reimbursement is run by the CMS Center for Medicare and Medicaid Innovation.
 - ONC Innovations work is focused on the supply side of innovation
 - the developers of new technologies to address healthcare innovation.
 - Supporting the developers, investors, facilities, etc. to move from prototype development to testing
 - Passionately Inspire Innovation
 - Demonstrate Bold Leadership
 - Promote Communication and Identify Pathways to Success
 - Champion Engagement
 - Support Judiciously
 - Innovations for Health IT – limited basis innovation testing to further evolve new technologies and provide real world exposure to potential solutions.
 - Prizes and challenges help innovators.
 - Interested in hearing from the Committee members on activities that the Innovations Initiative can leverage to support the Standards Committee

Discussion of Innovation Imperative

- Fridsma: Reason for the Innovation Presentation is to sensitize the HITSC that tools like the Innovations Grants are available.
- We want to make sure that the HIT Standards Committee starts to think about future opportunities and how to leverage challenge grants to get the community-at-large to help identify possible solutions to the Standards Committee's overarching questions.
- Think about how innovation ties into actual work, such as MU, S&I Framework, and Certification. Committee should think about shared goals and interacting with the vendor community

Closing Comments:

- Thanks to Judy Murphy for her work on the Implementation Workgroup and best of luck in her new role with ONC.
- Chris Ross has been accepted as a replacement for the Implementation Workgroup.
- Virtual meeting in December.