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TECHNOLOGY

Medical Information Technology

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Certified Electronic Health Records:

*Regulators Change Of Heart
Provides New Opportunities*

In my last article I discussed the health IT provisions in the American Recovery and Reinvestment Act (ARRA) which are designed to promote and provide incentives for the adoption of certified EHRs. I emphasized in the article that physicians who demonstrate the **meaningful** use of a **certified** EHR will be eligible for up to **\$44,000** each in incentive bonus payments, in addition to Medicare and Medicaid reimbursement, provided that they implement such a technological solution by January 1, 2011.

I admonished the Certification Commission for Healthcare Information Technology (CCHIT) to define what the term “certified EHRs” really means. I was especially concerned that the current certification system favors established and certified vendors posing insurmountable obstacles for smaller and emerging product developers, even though those may offer a better and more cost-effective product! Well, in a surprise move during a public meeting, CCHIT announced on June 17th a substantial revision of their certification approach and proposed three EHR certification pathways:

- EHR-C: Certified EHR Comprehensive
- EHR-M: Certified EHR Module
- EHR-S: Certified EHR Site

The EHR-C is the same certification that CCHIT has been doing since its inception. Unfortunately, the current certification process may mislead doctors to believe that a certified EHR is better and safer! This may not be the case at all! Quite frequently EHR vendors inflate their software with “certified” and often redundant features, to be able to claim that they were certified. Needless to say, many of those “certified” products are useless in the clinical practice! Furthermore, a considerable number of CCHIT certified EHR companies are going under leaving physicians behind desperately seeking new IT solutions. It is likely that the current EHR-C certification could be changed, added to, or modified in order to meet the ARRA requirements.

The EHR-M certification is where CCHIT will certify certain modules from a software vendor. CCHIT plans to combine and develop those criteria to decide which modules will be certified. For example, an EHR vendor

could choose to just get e-Prescribing EHR-M certified. Thereby, the use of this EHR component could qualify for ARRA incentives. With EHR-M, vendors can focus on one specific component of the EHR-C certification and make sure it works. This process will probably be much cheaper and will allow small companies to get their products certified.

The EHR-S category represents the most interesting and exciting new component addressing the home grown EHR system market and the so-called open-source program providers. The EHR-S certification is essentially where CCHIT will certify a site (organization, hospital, clinic) to show that they meet the various ARRA requirements. The EHR-S certification only certifies that the site meets the ARRA requirements and not necessarily that the software that site is using meets the requirements! Basically, the EHR-S certification tries to certify that a site is using an EHR to the ARRA requirements. This certification is a potential win-win solution for small group practices or hospital systems that have a mixture of all sorts of uncertified systems, but have the required functionality.

In summary, it is clear now that CCHIT is transitioning its timelines to adapt to the new requirements of the stimulus law (ARRA/HITECH) as well as the still-emerging work processes of the Office of the National Coordinator (ONC/HHS) and its two advisory committees. Therefore, there will not be a 2009 certification program! According to the CCHIT website they intend to launch the 2011 ARRA certification in the Fall of 2009. The correlation between the 2009 criteria and the 2011 ARRA criteria will depend on decisions yet to be made by ONC and the two advisory committees. These new criteria will open the EHR market for a fair competition of small and large vendors and will level the playing field. This will help physicians to obtain cost-effective, functional and certified EHR products that meet their professional and financial needs.

I look forward to reading your comments and suggestions on our blog at <http://miamimedblog.blogspot.com/> or send me a twit at <http://twitter.com/dadedoc>.

Disclosure: The author is a practicing family physician, addiction specialist and computer consultant. In addition, he is a founder and managing partner of VirtualMed, LLC (www.virtualmed.com)

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