



2015 Edition Cures Update Certification Whitepaper

Dynamic
Health IT



INTRODUCTION

The American Recovery and Reinvestment Act of 2009 allocated \$19.2 Billion to increase the adoption and use of Electronic Health Records (EHR) by physicians and hospitals. This program was called “Meaningful Use” and it dispersed funds through existing Medicare and Medicaid reimbursement incentives paid to hospitals and physicians who were “meaningful users” of “certified” EHR systems.

As part of this program, the Office of the National Coordinator for Health Information Technology (ONC) was created within the Department of Health and Human Services. The ONC develops Health Information Technology certification standards for EHR solutions. These certification standards have been updated periodically. The latest iteration is the 2015 Edition.

The ONC has appointed several Authorized Certification Bodies (ONC-ACB) to certify EHR solutions and ONC-Authorized Testing Laboratories (ONC-ATL) to administer testing. The current list is [posted online](#). The Drummond Group is most widely-used, followed by UL (formerly InfoGard). Products that pass certification are designated as CEHRT and listed on the [Certified Health IT Product List \(CHPL\)](#). These products are primarily developed and certified by software vendors but hospitals and other healthcare entities have also certified home-grown and vendor software. To maximize reimbursement and avoid penalties, clinicians and hospitals are required to use CEHRT by Centers for Medicare & Medicaid Services (CMS) programs, including Medicare, Medicaid, Promoting Interoperability and electronic Clinical Quality Measure (eCQM) reporting.



GOALS

Software developers certify their applications to meet the ONC's Certified EHR Technology (CEHRT) requirements to increase sales and meet customer needs. While certification is important, it is also important to minimize cost and resource utilization. Once certified, developers typically want to maintain appropriate certification and update to the latest standards when necessary.

HOW DOES THE CERTIFICATION PROCESS WORK?

Once a developer decides to get certified, there are decisions to be made:

- Should I certify all at once (big bang) or in stages (wave testing)?
- Which modules and versions of my product should be certified?
- Which criteria should I certify on?

Addressing the first item requires examining your company goals. Some vendors want to “get on the scoreboard” (the ONC CHPL) as fast as possible and don't mind incurring extra cost. In that case, wave testing is preferred. If you are not in a hurry and want to minimize expense, the big bang approach may be best. In either case, plan on several months to complete your first certification.

The second and third questions are intertwined and planning involves weighing a combination of factors. There are currently 58 criteria. Some are required and some are optional. ONC classifies most criteria into 3 categories and we've added a 4th catch-all:

- 1) “Base EHR” criteria involve core functionality.
- 2) “CEHRT” is a superset of Base EHR that includes important regulatory reporting criteria for your clients.
- 3) Privacy and Security” is self-explanatory but also includes criteria related to your software development process and audit trail functionality.
- 4) The remaining criteria are either optional or associated with Promoting Interoperability Objectives (PI). This category includes criteria that you **may** want to certify based on customer requirements and your company's goals.

For hospitals and clinicians to avoid penalties and qualify for incentive bonuses, they must have a full suite of 2015 Edition certified software. This means they must have software that meets all the criteria in ONC's 3 categories above, plus selected PI criteria. This suite can be a single product from one vendor or it can consist of multiple products from one or more vendors.



ONGOING REQUIREMENTS

Having your product listed on the ONC CHPL is an important milestone but certification doesn't stop there. There are ongoing requirements:

- Quarterly attestations you'll need to complete indicating whether you've changed functionality related to any certified products.
- Annual CQM updates affect reporting requirements but don't necessitate re-certification until 2015 Ed Cures Update is required.
- Other changes, described below.

Make sure to budget time and money for these ongoing requirements.

RECENT CHANGES

The 2015 Edition CEHRT requirements have been in place for some time but under the 21st Century Cures Act:

- CMS introduced a "2015 Cures Update" designation on the ONC CHPL and there are [new and revised criteria](#) under this new designation.
- The final rule lays out new Conditions of Certification (CoC) and Maintenance of Certification (MOC) requirements that include publicly posting documentation and attestations on your web site.
- ["Real World Testing"](#) is a new ongoing requirement that starts in December, 2021.
- [The Standards Version Advancement Process \(SVAP\)](#) is a voluntary program that allows vendors to migrate to newer versions of standards such as USCDI and C-CDA without the need to re-certify.

PREPARING FOR CERTIFICATION

The best publicly-available resources defining certification requirements are on the [healthit.gov 2015 Edition Cures Update Test Method web site](https://www.healthit.gov/2015-edition-cures-update-test-method-web-site). This site describes each criterion in detail and lists the testing methods and test steps required. It also indicates which criteria are:



Proctor Tested



ONC-ATL will administer testing

Self-Declaration



If you certified these criteria for 2014 Edition, that certification can be carried over to 2015 Edition.

Gap Eligible



Attest that your software includes the functionality

The Bottom Line IS THE TESTING/CERTIFICATION DOCUMENTATION THAT YOUR ONC-ATL PROVIDES WHEN YOU SIGN UP TO GET CERTIFIED.

The cost of certification is always an important factor. Cost will vary depending on which ONC-ATL and ONC-ACB you choose and how many products and criteria you certify. A modular certification could cost less than \$10K, while a complete certification could be over \$30K. You should get quotes from more than one certifying body and weigh pros and cons before deciding.

STRATEGIC PARTNER

Founded in 1999, Dynamic Health IT (DHIT) specializes in integration and exchange of healthcare data. Since the beginning of Meaningful Use, DHIT has assisted clients achieve HITECH and CEHRT certification. In addition to consulting services, DHIT provides our ConnectEHR, Dynamic FHIR API, Patient Portal, and CQMsolution pre-certified bolt-on software applications with flexible deployment and hosting options. As DHIT works with more vendors, we continue searching for additional ways to help clients meet certification requirements.

At DHIT, we welcome your feedback on requirements and are eager to assist with certification. Our expert consulting and bolt-on modules have paved the way for many successful EHR vendor certifications.

Please contact Michelle Bond for additional information, mbond@dynamichealthit.com.

