



Meeting Notes

Health Information Technology Advisory Committee Conditions and Maintenance of Certification Requirements Task Force March 12, 2019, 9:00 a.m. – 10:00 a.m. ET Virtual

The March 12, 2019, meeting of the Conditions and Maintenance of Certification Requirements Task Force (CMCTF) of the Health IT Advisory Committee (HITAC) was called to order at 9:00 a.m. ET by Lauren Richie, Designated Federal Officer, Office of the National Coordinator for Health IT (ONC).

Lauren Richie conducted roll call.

Roll Call

Raj Ratwani, Co-Chair, MedStar Health

Denise Webb, Co-Chair, Individual

Carolyn Petersen, Member, Individual

Sasha TerMaat, Member, Epic

John Travis, Member, Cerner

MEMBERS NOT IN ATTENDANCE

Kensaku Kawamoto, Member, University of Utah Health

Leslie Lenert, Member, Medical University of South Carolina

ONC STAFF

Elise Anthony, ONC

Stephanie Fiore, ONC

Cassandra Hadley, HITAC Back Up/Support

Christopher Monk, ONC SME

Lauren Richie, Branch Chief, Coordination, Designated Federal Officer

Kate Tipping, ONC Conditions of Maintenance of Certification Requirements Task Force Lead

Review of Charge

Lauren Richie reviewed the charge.

- **Overarching Charge:** Provide recommendations on the “application programming interface (API),” “real world testing,” and “attestations” conditions and maintenance of certification requirements; updates to most 2015 Edition health IT certification criteria; changes to the ONC Health IT Certification Program; and deregulatory actions.
- **Specific Charge:** Provide recommendations on the following:



- “API,” “real world testing,” and “attestations” conditions and maintenance of certification requirements
- Updates to the 2015 Edition certification criteria: “Standardized API for patient and population services,” “electronic health information export,” “electronic prescribing,” “clinical quality measures – export,” and privacy and security-related attestation criteria (“encrypt authentication credentials” and “multi-factor authentication”)
- Modifications to the ONC Health IT Certification Program (Program)
- Deregulatory actions related to certification criteria and Program requirements

Lauren Richie turned the meeting over to Raj Ratwani.

Deregulatory Actions Recap and Discussion

Raj Ratwani, co-chair, welcomed the CMCTF and began the discussion by reviewing data ONC provided, as a follow-up from yesterday’s meeting.

REMOVAL OF RANDOMIZED SURVEILLANCE REQUIREMENTS

Raj Ratwani presented data that ONC shared in regards to the surveillance results.

Between August 2016 – March 2019

- 55 unique surveillance activities
 - 11 resulted in the identification of a non-conformity
- Across the 55 there were 276 criteria assessment
 - 261 criteria resulted in conformity.

Based on the review of the data, the CMCTF supports this but suggests that if this provision is implemented, do not remove the prohibition on the consecutive selection of one health IT module (preserve (c)(6)).

REMOVAL OF CERTAIN 2015 EDITION CERTIFICATION CRITERIA AND STANDARDS

ONC proposes to remove the following criteria from 2015 Base EHR Definition: “problem list”

- “medication list”
- “medication allergy list”
- “drug formulary and preferred drug list checks”
- “smoking status”

ONC proposes to remove the following 2015 Edition certification criteria:

- Patient-specific education resources
- Common Clinical Data Set Summary (CCDS) Record – Create
- Common Clinical Data Set Summary (CCDS) Record – Receive
- Secure Messaging

Discussion



- **Sasha TerMaat** noted that ONC cited that these items are not interoperability. She also noted that ONC believes these are included and will continue to be included in EHR systems. That being said, she found ONC's reasons for removing convincing.
- **John Travis** agreed with Sasha TerMaat.
- **Denise Webb** questioned if other items should be removed.
 - **Sasha TerMaat** noted that the same reasoning could be said for family health history and demographics. At some point, this will be included in USCDI.
 - **John Travis** suggested that if the requirements are found in interoperability criteria, then the EHR is already required to collect that data in the form that is necessary for interoperability; therefore, they should be removed.
- The CMCTF decided to make a recommendation that once items are required for interoperability, they should be removed.

REMOVAL OF CERTAIN ONC HEALTH IT CERTIFICATION PROGRAM REQUIREMENTS

- **Sasha TerMaat** and **John Travis** noted that this is a bit confusing.

Recognition of FOOD and DRUG ADMINISTRATION PROCESS

- **John Travis** commented that conceptually it sounds great, but with so many unknowns it is hard to make a judgment. This should be postponed until future rulemaking when more is known.
- The CMCTF decided not to make a recommendation

Public Comment

There was no public comment.

Comments in the public chat

Stephanie Eckgren: They also recommend to remove the transparency attestation requirement

Next Steps and Adjourn

There will be a meeting scheduled to review draft recommendations and prepare for presenting to the HITAC.

Denise Webb asked the CMCTF members to review the Google doc to be share all their thoughts are included to help prepare recommendations.

Lauren Richie adjourned the meeting at 9:41 a.m. ET.