SATINSKY CONSULTING

FALL 2010 NEWSLETTER

The primary reason to purchase an electronic health record (EHR) system is to improve the quality of care and the patient experience. However, the availability of a federal financial incentive to providers that meet the requirements for Meaningful Use has motivated many physicians to take the plunge. We are helping physicians at three different stages – those wanting to transition from paper to electronic records, those wanting to use their existing EHR in new ways, and those in new practices that are purchasing EHR from the outset.

Margie Satinsky

In our Summer 2010 Newsletter, we explained the concept of Meaningful Use - the provision in the HITECH Act part of the American Recovery and Reinvestment Act (ARRA) that defines the criteria providers must meet to qualify for the incentives. Questions keep coming. We heard them at our September *EHR and Meaningful Use* presentation for the WakeMed AHEC and the Wake County Medical Society and again as a member of the North Carolina AHEC Vendor Selection Committee. We're sharing the questions and our responses in order to spread the knowledge.

MEANINGFUL USE – 10 MORE THINGS TO KNOW

1. **Has the Office of the National Coordinator for Health Information Technology (ONC) named any organizations that will certify EHR vendors?**

   Yes. During September, 2010 the ONC named three Authorized Testing and Certification Bodies (ATCBs) as meeting its requirements to issue Temporary Certification to EHR products. These include the Certification Commission for Health Information Technology (CCHIT), the Drummond Group, and just recently, InfoGard Laboratories.

2. **Have the three organizations identified above tested and certified any EHR products?**

   As of October 10, 2010 both the CCHIT and the Drummond Group have tested and certified vendors' products that meet the 2011/2012 Stage 1 Meaningful Use criteria. The list of certified products is available at **http://onc-chpl.force.com/ehrcert**. It includes both Complete EHRs that meet all of the criteria for eligible provider or hospital technology and EHR Modules that meet one or more of the criteria. If you don't see the name of your vendor and product on the list, ask your vendor for additional information. The process for reviewing applicants for certification is ongoing, and your vendor and product may be scheduled for review within the next few months.

3. **What's the timetable of major events relating to qualifying for Meaningful Use?**

   - **July 2010:** Submission of applications from entities that wish to be designated as certifying bodies

   - **Fall 1010:** Availability of certified EHRs for purchase

   - **January 2011**: On-line registration of eligible providers and hospitals that wish to apply for the Stage 1 Meaningful Use financial incentive (**http://www.cms.gov/EHRIncentivePrograms**)

- **April 2011:** Eligible providers and hospitals begin making attestation on meeting Meaningful Use criteria

- **Mid-May 2011:** Beginning of Medicare incentive payments

- **2011:** Beginning of Medicaid EHR incentive payments by states

- **2013/2014:** Application of Stage 2 requirements

- **2015:** Application of Stage 3 requirements

4. For what time period must an eligible provider prove Meaningful Use in order to qualify for the incentive?

When an eligible provider first applies for the incentive, the practice must be able to demonstrate Meaningful Use for a continuous 90 day period within a single calendar year.

5. Our practice is overwhelmed with the Meaningful Use requirements. Where should we start?

- Identify a team within your practice that will assume responsibility for Meaningful Use. Include a physician leader, the practice/office manager, and another clinical staff member.

- Familiarize yourself with the Health Information Technology (HIT) core and menu set objectives/measures and with the requirements for reporting clinical quality.

- Contact your EHR vendor for specific information on product certification, ways in which the requirements and your compliance appear in the software, and clarification of the way(s) in which the vendor will help you comply with Meaningful Use. All vendors will help you gather information, but some will do more than others with respect to reporting information to CMS.

- Using a structured guide, do a workflow assessment of your practice.

- Based on the results of your workflow assessment, identify areas that you have not addressed at all and problem areas that need to be corrected.

- Using both your EHR software and management tools that you create, monitor your compliance with the Meaningful Use requirements. Identify and correct problems before you apply for Meaningful Use.

6. What major challenges can we expect in attempting to comply with the Meaningful Use requirements?

- As always, technology is a tool; people make it work. Don't assume that if your EHR vendor's product meets requirements that your practice will automatically qualify for the financial incentives. Your workforce members must use the software in a specific way to meet the requirements for eligible providers.

- Keeping track of HIT 15 core and 5 menu set objectives/measures and 3 clinical quality objectives/ measures will be difficult. Make sure you have a way to monitor what you are doing/not doing.

- Strong leadership is essential. If you are making the effort to apply for Meaningful Use money, make sure somebody's in charge.

7. Must we have a patient portal to comply with the Meaningful Use requirements?

The law doesn't require that an eligible provider have a patient portal, but a patient portal is the easiest and least expensive way for practices to meet several of the HIT objectives/measures. Specifically, you can use the portal to provide patient-specific education resources, provide patients with an electronic copy of their health information, and provide clinical summaries for patients for each office visit. The best way to offer a patient portal is to include an easy-to-find link to it on your website.

8. What is the relevance of HIPAA compliance to the Meaningful Use requirements?

One of the HIT menu set objectives/measures is the protection of electronic health information created or maintained by the certified EHR through the implementation of appropriate technical capabilities. The measure is the conduct or review of a security risk analysis, the identification of gaps, the correction of deficiencies, and the implementation of security updates. That sounds like HIPAA compliance to us!

9. Where can we get help with Meaningful Use?

- The Carolinas Center for Medical Excellence offers educational seminars and consultation to primary care practices.

- The North Carolina AHEC Regional Extension Centers (RECs) offer assistance to primary care practices that apply for help and meet specific criteria (e.g., size, Medicaid/Medicare patients, provision of service in rural or medically underserved areas).

- The North Carolina Medical Society Foundation complements the services available from the North Carolina RECs by offering consultation. Emphasis is on financial analysis as preparation and planning for EHR.

- North Carolina Health Information and Communications Alliance (NCHICA) offers information on interoperability (i.e., the electronic links between your practice and other providers).

10. How can Satinsky Consulting LLC help our practice meet Meaningful Use requirements?

If you don't yet have EHR:

1. Assistance in workflow analysis.

2. Identification of vendors that offer products and services that meet your needs. We're vendor-neutral and have worked with many different companies. Benefit from our experience and that of our clients.

3. Guidance in vendor selection and implementation.

4. Assistance in the evaluation of vendor products, plans, strengths and weaknesses, and pricing.

5. Comparison of vendor proposals. No two proposals come in the same format. We simplify this challenging task.

6. Negotiation of price and other contract terms. Benefit from our experience and leverage with vendors. The organizations listed above do not provide this type of assistance.

7. Arrangements for site visits to our clients so you can benefit from their experience.

8. Vendor reference checks.

9. Troubleshooting in practice-vendor communications. Sometimes you need an account manager who is more experienced than the one assigned to you. We'll help you get the right person.

If you have EHR:

1. Provision of up-to-date summaries of federal and other requirements for IT. Forget about surfing the web; we have all the details in easy-to-read format.

2. Assistance in workflow analysis (if you didn't do it as part of your EHR selection process).

3. Based on the results of your workflow analysis, identification of operational issues and problem correction.

4. Assistance in understanding and complying with specific HIT and clinical objectives/measures.

5. Assistance in HIPAA Privacy and Security Rule compliance. We have two comprehensive and up-to-date manuals that can be customized for your practice. We train your workforce, too.

## Articles on Selecting and Implementing Information Technology

Use the links below, or visit **www.satinskyconsulting.com/publications.htm** to read these and other articles by Margie Satinsky.

- **"Electronic Health Records. Is Now the Time for Your Practice?"**
  North Carolina Medical Board Forum • Summer 2010

- **"Selecting Electronic Health Records and Other Technology Solutions to Support Your Practice"**
  Medical Association of Georgia Journal • 2009

- **"Medical Practice Excellence in the 21st Century: How to assess your practice before choosing the best information technology - Part 3 of a three-part series"**
  Skin & Aging • 2008

Upcoming Webinars on Information Technology

November 17, 2010 2:00 pm ET   **"Creating a Website for Your Practice"**
Sponsored by TSI

Ideas for Managing Your Practice
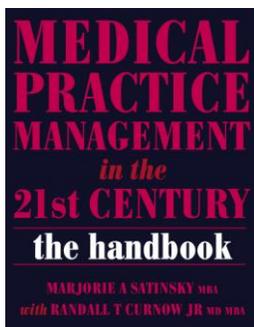
If you are looking for new ideas to improve your bottom line and practice operations, order **The Handbook for Medical Practice Management in the 21st Century**. The book and the companion website offer concrete suggestions and practical tools. Authored by Marjorie A. Satinsky, M.B.A., with Randall T. Curnow, Jr., M.D., M.B.A., the handbook is available from Radcliffe Press.

To order the book, call 800.247.6553 or visit www.radcliffe-oxford.com.