



Electronic Health Records Association Responds to ONC and CMS NPRMs on Meaningful Use Stage 2

CHICAGO (May 4, 2012) – The Electronic Health Records (EHR) Association today submitted its detailed comments on the two Notices of Proposed Rule-Making (NPRMs) on Meaningful Use Stage 2 – one from the Centers for Medicare and Medicaid Services (CMS) for healthcare providers laying out revised Meaningful Use objectives and measures for use of certified electronic health records (EHRs); and the second from the Office of the National Coordinator for Health IT (ONC) on EHR certification criteria and Standards related to Stage 2.

"This was truly a collaborative effort that engaged more of our members than any of the previous public comment opportunities," said Leigh Burchell, Vice President of Government Affairs for Allscripts and Chair of the Association's Public Policy Leadership Workgroup. "Seven of our eight standing workgroups focused on specific sections of the NPRMs, ultimately collecting feedback from 138 individuals representing 25 member companies. We're delighted with the level of participation, which represents the majority of operational EHRs in the US and, most importantly, their users, lending credibility and weight to these comments."

The Association provided many specific recommendations on proposed certification criteria and standards as well as on Stage 2 meaningful use requirements for providers. It praises CMS' confirmation of a one-year delay in the start of Stage 2 in order to allow more time for development, testing and implementation of EHRs updated for Stage 2, which had been requested by a wide variety of stakeholder organizations.

The EHR Association represents a community of software developers with many decades of experience creating successful electronic health records and related modules. Their collaborative response to the NPRMs is intended to provide input from both EHR companies and their customers based on this unparalleled experience. Comments and suggestions sent to ONC and CMS represent the consensus of companies that bring many points of view, including small ambulatory systems to large enterprise systems, software-as-a service models to traditional software, and software module suppliers.

"Through our comments, we try to highlight many of the initiatives from ONC and CMS that we agree with and offer our comments on how to fine tune other areas for best adoption by our users," added Carl Dvorak, Vice President at Epic and Chair of the EHR Association.

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Dvorak went on, "We are honored to carry the message from our customers to ONC and CMS in support of appropriate timelines for not only software development and deployment, but most importantly for safe adoption by clinicians. In this regard, we strongly support and appreciate CMS' proposed one-year extension of Stage 1 of meaningful use. We also recommend that CMS and ONC consider the additional ideas shared previously by the EHR Association and again in our comments this week that would build upon the one-year extension and assist in holistically resolving the challenge of appropriately timing Stage 2 for all stakeholders."

The Association also highlighted that many elements of both the CMS and ONC proposed rules are aimed at substantially increasing the use and benefit of standards-based interoperability and exchange, which has been one of the EHR Association's areas of advocacy and support since its inception in 2004.

Ms. Burchell concluded, "Overall, we congratulate ONC and CMS on the tremendous effort that went into the development of the proposed rules, as well as the progress we've made as an industry in accelerating the adoption of EHRs and other health IT. We are ready to work with ONC and CMS to add clarification to the final rules as quickly as possible after they are published to ensure that our companies are ready to support the work our customers will need to do to upgrade their systems and implement many new features prior to the rapidly approaching start of Stage 2."

The complete responses to both the ONC and CMS NPRMs are available at http://www.himssehra.org/docs/20120503_EHRCommentsONCMU2NPRM.pdf and http://www.himssehra.org/docs/20120503_EHRCommentsCMSMU2NPRM.pdf.

About the HIMSS EHR Association

The HIMSS EHR Association is a trade association of 42 electronic health record (EHR) companies that join together to lead the health IT industry in the accelerated adoption of electronic health records in hospital and ambulatory care settings in the US. The Association provides a leadership forum for the EHR software provider community to speak with a unified voice relative to standards development, the EHR certification process, interoperability, performance and quality measures, and other EHR issues as they become subject to increasing government, insurance and provider-driven initiatives and requests. Membership is open to HIMSS Corporate Members companies that design, develop and market their own EHRs. The Association is a partner of the Healthcare Information and Management Systems Society (HIMSS) and operates as an independent organizational unit within HIMSS. For more information, visit www.himssEHRA.org.

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