230 E. Ohio Street, Suite 500
Chicago, IL 60611-3269

Tel 312 664 4467
Fax 312 664 6143

www.himss.org

April 30, 2009

Mr. Harry L. Reynolds, Jr.
Chairman
National Committee on Vital and Health Statistics
U.S. Department of Health and Human Services
200 Independence Avenue, NW
Washington, DC 20201

Dear Chairman Reynolds:

On behalf of the Board of Directors and 20,000 individual and 350+ corporate members of the Healthcare Information and Management Systems Society (HIMSS), we are pleased to submit, for your consideration, two definitions of "meaningful use of certified EHR technologies" as approved by the HIMSS Board of Directors; one for hospitals[1] and a second for physicians[2].

ARRA calls for multiple years of Medicare incentive payments to hospitals and physicians who meet the requirements of "meaningful use" of "certified electronic health record technology". To be eligible for the incentive payments, hospitals and physicians must use the technology in a meaningful manner; to exchange electronic health information to improve the quality of care; and, submit clinical quality measures – and other measures – as selected by the Secretary of Health & Human Services (HHS). Further, hospitals and physicians must meet the definition within a specified time frame, which as described in ARRA, must be made increasingly stringent over time by the Secretary.

To inform the Secretary's development of such criteria, HIMSS engaged its members (73% of which work in end-user settings), and the public at-large, in an extensive consensus-building effort. This effort resulted in the Board of Directors-approved definitions. In summary, HIMSS recommends the following:

1. To ensure continuity, recognize CCHIT as the certifying body of EHRs.
2. To achieve incremental maturation of meaningful use, adopt metrics that can be reasonably captured and reported beginning in FY11/2011, and then made increasingly stringent using intervals of not less than two years. Our definitions include specific metrics to enact, in phases, over a multi-year period.
3. To bridge existing gaps in interoperability of health information, coordinate with HITSP and IHE to create new harmonized standards and implementation guides.
4. Reconcile the gap between "certified EHR technologies", "best of breed", and "open source" technologies.

For our nation to benefit from the spirit and intent of ARRA – and for hospitals and physicians to have a reasonable chance of achieving the definition – HIMSS asserts that the requirements must be

[1] Hospitals: http://www.himss.org/content/files/2009HIMSS_DefUseHospitals.pdf
[2] Physicians: http://www.himss.org/content/files/2009HIMSS_DefUseEHRUsers.pdf

introduced – and made increasingly stringent – in incremental stages. In the final phase, which must commence in FY15, HIMSS believes the mature definition of "meaningful use of certified EHR technology" includes these attributes:

- A functional EHR certified by CCHIT;
- Electronic exchange of standardized patient data with clinical & administrative stakeholders using HITSP interoperability specifications and IHE frameworks;
- Clinical decision support providing clinicians with clinical knowledge and intelligently-filtered patient information to enhance patient care;
- Demonstrated practice of electronic prescribing;
- Demonstrated reporting of quality and patient safety data; and,
- Capabilities to support process and care measurement that drive improvements in patient safety, quality outcomes, and cost reductions.

HIMSS recognizes, and respects, the complex nature of healthcare and efforts to define meaningful use of certified EHR technologies. To that end, HIMSS offers our content expertise and our significant reach into IT professionals working within our nation's healthcare environment to achieve the spirit, intent, and benefit of ARRA.

The Act has tremendous potential to improve the quality, safety, and cost-effectiveness of patient care. To achieve ARRA's goals, HIMSS looks forward to working collaboratively with public and private sector stakeholders to advance patient care through the best use of IT and management systems. If you or your team have any questions, please feel free to contact Tom Leary, Sr. Director of Federal Affairs.

Sincerely,

/s/ /s/

H. Stephen Lieber, CAE
HIMSS President/CEO

Charles E. Christian, FCHIME, FHIMSS
Chairman, HIMSS Board of Directors
Director IS/CIO
Good Samaritan Hospital

cc: David Blumenthal, MD, M.P.P; National Coordinator for Health Information Technology
Ms. Charlene Frizzera; Acting Administrator, Centers for Medicare and Medicaid Services