Summary of Testimony
National Committee on Vital and Health Statistics
Hearing on Criteria for Meaningful Use of EHRs
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Definition of Meaningful Use Needs to Consider Broad Context for Health IT Policy and Funding

Health IT is essential to achieving broader health reforms, and creating a health care system that is safe, effective, affordable, and reliable in its performance. We should not forget the compelling evidence assembled by the Institute of Medicine – the quality chasm is wide, and bold systemic changes are needed to fill the gap. These reports also focused on the need to interconnect health IT systems and to facilitate broad sharing of information, including functional specifications for electronic medical records, and data standards for patient safety surveillance and reporting. Since that time, many other groups have built on IOM's work and documented specific gaps in care and outcomes, while also delineating the characteristics of systems approaches to achieve higher performance. This growing body of work draws a strong relationship between health IT use and the alignment of organizational, technical, clinical and financial imperatives.

Meaningful Use Requires Development of HIE Infrastructure

Creating a robust and sustainable health information infrastructure requires coordination of a complex set of activities, unified and driven by a common vision for the "big picture" of health care reform discussed briefly above. Essential building blocks include:

- A framework for collaborative governance to set and enforce policy;
- A defined technical architecture including HIE standards and protocols;
- Clinical and public health uses, defined in a structured way, and infused throughout policy and technical architecture;
- Alignment of EHR and HIE requirements, financing and incentives; and
- Support services to expand and ensure successful EHR use.

In short, technical interoperability requirements and certification are not sufficient – the goals for meaningful use of EHRs can only be fully and efficiently realized through an integrated policy and standards-based HIE framework. This integration is essential to promoting broad use of EHRs because it will maximize data availability, reduce cost, improve reliability, enable population based assessment, and ultimately accelerate improvements in clinical care and outcomes. In particular, this approach is essential to support public health surveillance and improvement efforts through combined deployment of HIE and EHR capabilities which could not be addressed solely through EHR use.

HHS Should Align Policy and Financing Mechanisms to Support Both HIE and EHRs

With stimulus funding and new policy direction, HHS has both authority and resources to support coordination of HIE investment and implementation along with policies and funding for meaningful use of EHRs. Incentives should support not only hardware and software costs, but also operating costs for HIE, since HIE is an essential component to making point of care information more robust and reliable.

HHS should establish a broad governance and policy structure to guide further development of national policies aligning the policy and standards committees with other multi-stakeholder consensus organizations; define specific roles for states to coordinate implementation activities through multi-stakeholder, public-private partnership models; align policy and financing levers to establish coordinated incentives for HIE development and EHR use; support ongoing work to further consensus development and use of clinical quality measures (including integration of new measures resulting from comparative effectiveness, clinical research, and pharmaceutical surveillance activities separately funded by the stimulus legislation); and establish a roadmap for future systems enhancements through certification processes and reimbursement policies.