Good morning. I am Dr. Sarah Corley, Chief Medical Officer for NextGen Healthcare and a former CCHIT commissioner.

As constraints on provider's time become more prevalent, healthcare professionals are turning to technology-driven solutions that can increase practice efficiencies and allow them to focus on delivering quality care to their patients. A certification program can give providers the assurance that the software product will meet **baseline** standards for compliance with regulatory requirements as well as the functionality that stakeholders think is important in supporting improved care.

Meticulous testing of EHR products is critical to their optimal performance and to maintain the highest standards of patient safety possible. The current certification timelines and cycles do not allow time necessary to safely develop content focused on user workflows. Given today's limited timelines, EHR developers do not have all the necessary requirements available prior to beginning their work, which means rework and extensive wasted effort when late guidance is issued. In addition to the 18 month time period that vendors require from the final release of all requirements, test scripts and testing tools to safely develop the software, there must be time for health care providers to thoroughly test the software in their unique environments. That process includes testing all interfaces and connected software and devices, adjusting workflows and training end users. Our clients generally require 12-18 months to complete this work after general release of the software before they are willing to introduce it into their production environment.

To that end, I recommend returning to the certification process that was followed in the Certification Commission for Health Information Technology (CCHIT) model; which included key elements such as broad stakeholder participation, an environmental scan of availability of functions, maturity of proposed standards, and a published roadmap. Extensive stakeholder input by clinicians, vendors, academia, developers, payers, and consultants is essential to assure that the certification is relevant to those purchasing and using the products and services. There should not be requirements to collect data that is not relevant to the care of the patient in that setting.

The certification process should include environmental scans to identify the current state and availability of key requirements and functionality. Most importantly, a successful certification program must provide a forward-looking roadmap of certification requirements and clearly detail additional criteria vendors are to expect in the future. That could continue to drive enhanced capabilities and standards compliance without releasing requirements prematurely. With roadmaps, certification occurs with predictable timelines and requirements providing the opportunity through which vendors could develop, QA and test software to increase certification preparedness and the end users have the opportunity to plan for changes in workflows. In addition to predictable timelines, test scripts need to be published well in advance and pilot testing of the test scripts must be done before the final version is released to catch and address and potential problems.

The current program includes many requirements not relevant to large segments of the healthcare provider community. Certification requirements should be limited to the core that all physicians or hospitals must adhere to. If there is a need for additional requirements for certain types of healthcare providers, add on items can be certified separately so vendors who do not serve that market are not forced to develop software that their clients do not want or need. There should be evidence of the utility of any given certification requirement. It is important to remove requirements for automatic numerator and denominator calculations for measures that require additional documentation that is not necessary for the provision of care. These measures should be attested to.

 No matter what the approach, for HIT product certification to truly be of value to interested parties, those parties need clear knowledge of what the certification program intends to accomplish and its criteria need to match what the end user is expected to accomplish. It should include only criteria that support the core needs of the regulatory program focusing on a more narrow set of truly import and achievable goals. While our common goals are improving quality, increasing patient safety, and expanding interoperability, I believe this can be done with a much narrower range of certification requirements.