Good morning, my name is Joseph Geretz, I am Chief Software Architect at SRSsoft. Thank you for providing me with this opportunity to supply input on the Certification program.

Certification today, is the capstone to Meaningful Use objectives and measures – with its purpose stated on HealthIT.gov[1] as follows:

> "Certification ensures that EHR technologies meet the standards and certification criteria to help providers and hospitals achieve Meaningful Use objectives and measures[2]."

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[1] http://www.healthit.gov/policy-researchers-implementers/certification-programs-policy

[2] Paraphrased for brevity.

The program's total impact on vendors accrues from the **complete set of** objectives, measures, standards and certification criteria. The **bulk** of the burden which is placed on vendors today, can be traced to the vast and varied scope of the Objectives and Measures upon which Certification is based.

Since 2010 we have experienced a progression of development from one peak to the next, without seeing any valleys. We have lost our ability to innovate on anything above and beyond the mandates of Meaningful Use. Since embarking upon this program we have been unable to devote resources to features which our customers are requesting. In essence the program has become our product manager; all Meaningful Use all the time.

Our customers ultimately bear this burden in terms of higher costs and lost productivity, as the program – with its tight deadlines, trumps our focus on ease of use and productivity.

I deliver my remarks on Certification today with some degree of ambivalence. Narrowly focused evaluation of Certification will yield some benefit, but only to the Certification process itself. A broader evaluation of the **entire scope** of Meaningful Use objectives and measures, **together** with the demands of Certification requirements is warranted. There is much to discuss on this subject, and hopefully we will have that opportunity in the near future.

I will now address the points which are specific to Certification:

Certification benefits (assuming an ideal certification program)**:**

From the vendor perspective, the beneficial aspects of Certification are those which align progressive policy with commercial interests. The convergence of commercial motivators with proper healthcare policy will be the most effective combination of factors to advance the cause of healthcare IT via private industry.

The most beneficial aspects of Certification are those which govern relationships between vendors, and those which help to promote relationships with customers.

These are:

a. **Certification of Interoperability** – this levels the market for all vendors; interoperability barriers are removed so that any conformant EHR may be integrated within any healthcare community.

and

b. **Certification of Suitability** – certifies for the consumer which products will be suitable for a desired purpose. *To the extent Meaningful Use remains attractive to our customers, this certification adds value. We caution however that the long-term attraction of physicians to the Meaningful Use program should not be taken for granted. Should this attraction wane, this aspect of certification will cease to be of interest from our perspective.*

Challenges we have experienced with the current certification program include**:**

1. Assimilation of specifications from a wide range of sources,

2. Specifications which are
    i. out of synch with the state of the industry,
    ii. in conflict with typical practice workflows, or –
    iii. based on immature standards

Additionally, we are challenged by –

3. Requirements to interoperate with unregulated partners

and

4. Certification utilities and testing tools which are –
    i. Defective, or –
    ii. Overly strict with respect to the requirements

Our proposal for an enhanced certification process**:**

We recommend a narrowly focused certification suite which places emphasis on those aspects of EHR technology which are the drivers for the most important items among the wide range of prescriptive criteria to which we must certify today.

These are:

    a. **Interoperability**
       and
    b. **Quality Measures**

This concise set of criteria represents the convergence of progressive healthcare policy with commercial interests. With this framework in place, vendors, in cooperation with market forces, will naturally produce their EHR's to a standard which will advance the cause of Healthcare IT.

We support the suggestion tendered by Mickey McGlynn on behalf of EHRA, for the initiation of a holistic Kaizen process to review the combined Meaningful Use & Certification programs, with an eye toward improvements. We would be happy to participate in such a process.

Once again, I thank the ONC and HIT Policy Committee for providing me the opportunity to deliver this testimony today.