



Health IT Policy Committee

A Public Advisory Body on Health Information Technology to the National Coordinator for Health IT

May 28, 2013

Farzad Mostashari, MD, ScM
National Coordinator for Health Information Technology
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

Dear Dr. Mostashari:

The HIT Policy Committee's (Committee) Certification and Adoption Workgroup were asked to provide comments on the Health Information Technology Patient Safety Action & Surveillance Plan related to the focused questions listed below:

- Meaningful Use and Safety Risk Assessment:
 - To improve the safety of EHRs, should there be a Meaningful Use requirement for providers to conduct a health IT safety risk assessment?
 - Are there models or standards that we should look to for guidance?
- Meaningful Use and Reporting:
 - Should ONC require any form of reporting/reporting verification under Meaningful Use?
- Standards and Certification Criteria Next Steps: The Health IT Safety Plan states that "ONC intends to continue using its standards and certification criteria and certification program rulemaking in ways that enhance health IT patient safety, focusing on human factors, safety culture, and user - centered design (Page 17)." In the 2014 Edition EHR certification criteria final rule, we took the steps below to improve usability and patient safety.
 - What should be the next steps in terms of EHR technology certification?
 - Certified EHR technology developers will be required to publicly identify a method of incorporating user - centered design of eight certification criteria that have a high likelihood of helping to prevent medical errors (77 Fed Reg 54186-54189 (September 4, 2012)).
 - Certified EHR technology developers will also be required to provide transparency regarding their approach to "quality management systems," (77 Fed Reg 54189-54191 (September 4, 2012))

The Workgroup's high level comments were presented to the Committee on February 6, 2013. The Committee deliberated and approved the consolidated comments attached for transmittal to the National Coordinator.

Sincerely yours,

/s/

Paul Tang
Vice Chair, HIT Policy Committee

Attachment