August 10, 2009

David Blumenthal, MD, MPP
National Coordinator for Health Information Technology
Office of the National Coordinator
Department of Health and Human Services
Room 729D
200 Independence Avenue, SW
Washington, DC 20201

Dear Dr. Blumenthal:

The Health IT Policy Committee (the Committee) received a number of recommendations from its Workgroups during the July 16, 2009, Committee meeting. The first recommendation, which came from the **Meaningful Use Workgroup,** pertains to the definition of "meaningful use," and focuses on improved health outcomes and efficiency as demonstrated through the meaningful use of certified electronic health record (EHR) technologies. During that meeting, the Committee considered the recommendation and decided to adopt it as its own.

As background, the American Recovery and Reinvestment Act of 2009 authorized the Centers for Medicare & Medicaid Services (CMS) to provide a reimbursement incentive for eligible professionals and hospitals who are "meaningful users" of certified electronic health records (EHRs). This incentive payment is anticipated to begin in 2011 and gradually decrease through 2014, after which providers are expected to have adopted and be actively utilizing an EHR in compliance with the "meaningful use" definition or they will be subject to financial penalties.

As we understand, CMS intends to publish a proposed rule in the next 12 months to propose a definition of meaningful use of certified Electronic Health Records (EHR) technology and establish criteria for the incentives programs. We have been informed that CMS is working with the Office of the National Coordinator (ONC) to identify the proposed criteria. Consequently, the work of the HIT Policy Committee serves an advisory purpose, and will hopefully lay a foundation for the policies, which as we understand, will be proposed by the Secretary and subject to public comment.

The ultimate goal of meaningful use of an EHR is effective use and exchange of electronic health information to improve health care and manage chronic disease while decreasing costs and inefficiencies. However, this will be a gradual process that will require time, education, workflow redesign, and seeks to improve the delivery of medical

care. In order to achieve widespread use of health information technology, it is important to start with a basic set of features and capabilities focusing on data collection and build on these capabilities that can become the basis for improved performance in subsequent years.

The Committee reached several important decisions regarding the definition of meaningful use, progressing from a focus on process to achieving measurable outcomes that support patient engagement and improved care coordination. Five health outcomes are prioritized for consideration by the National Coordinator and ultimately for the Department of Health and Human Services (HHS): improve quality, safety, efficiency, and reduce health disparities; engage patients and families; improve care coordination; improve population and public health; and ensure adequate privacy and security protections for personal health information.

RECOMMENDATION

We are submitting to you as our Recommendations the attached matrix for your consideration and possible consideration by the Department of Health and Human Services (HHS) in defining "meaningful use" of an electronic health record (EHR).

The second set of recommendations originated from the Committee's **Certification/Adoption Workgroup**. During the July 16th meeting, the Committee considered the recommendations, which focus on improving the certification process to ensure that a system is able to achieve government requirements for security, privacy, and interoperability, and that the system would enable the Meaningful Use results that the government expects.

After lengthy discussion, the Committee accepted the following high-level recommendations as they relate to certification and are submitting them to you as our recommendations.

RECOMMENDATIONS

1. Focus certification on meaningful use.
2. Leverage the certification process to improve progress on security, privacy, and interoperability.
3. Improve the objectivity and transparency of the certification process.
4. Expand certification to include a range of software sources: open source, self-developed, etc.
5. Develop a short-term transition plan for the certification process.

The Committee recommends that the National Coordinator accept its Recommendation on "meaningful use," and its Recommendations on Certification, and further request that the Secretary direct the appropriate operating and staff divisions (OP/STAFFDIVs) within the Department to consider how best to address the Recommendations.

We fully appreciate your Office's and the Department's leadership role and efforts to advance widespread adoption of interoperable health information technology in the United States.

Sincerely,

Paul Tang
Vice Chair
Health IT Policy Committee

Attachment: Matrix on Meaningful Use Objectives and Measures