EXTRA
CONTENT
AVAILABLE

EHR Certification for Meaningful Use: Big Changes Coming in 2014

BY LESLIE BURLING-PHILLIPS, CONTRIBUTING WRITER
INTERVIEWING MICHAEL F. CHIANG, MD, JEFFERY DAIGREPONT, AND JULIA LEE, JD, OCS

Next year, there will be considerable change within the realms of electronic health records (EHRs). Currently, to qualify for the program's incentive payments, eligible professionals (EPs) must use a 2011-certified EHR system—one certified as capable of meeting the meaningful use (MU) requirements mandated by CMS since 2011. Next year, however, EPs must use an EHR system that is 2014 certified. If you start learning how to navigate through these changes now, before the upgrade is mandatory, you can pave the way for a smooth transition.

EHR Certification: 2011 vs. 2014

2011 certification was a one-size-fits-all approach. At the inception of the incentive program, a practice's EHR system had to be certified as capable of performing all MU measures, even if the EPs for that practice met the exclusion criteria for some measures.

2014 certification is more flexible. "CMS recognized that many of the certification requisites may not be relevant to certain medical specializations—checking vital signs or recording immunizations in ophthalmology, for example," said Michael F. Chiang, MD, chairman of the Academy Medical Information Technology Committee. As a result, CMS is emphasizing a modular approach.

This concept of modular certifica-

Certification vs. Meaningful Use

"The differentiation between 2014 certification and Stage 2 MU has been confusing for many because the terms are often, but erroneously, used interchangeably," said Dr. Chiang. The rules governing certification are set forth by the Office of the National Coordinator (ONC), while the MU criteria are dictated by CMS. The two entities and processes are inextricably tied to each other but are not synonymous.

Going forward in the program, "rather than referring to systems as Stage 1 or Stage 2 certified, they will be termed either 2011 or 2014 certified. Furthermore, eligible professionals participating in MU must use a system that is 2014 certified, as the original certification criteria set forth in 2011 will no longer satisfy the updated specifications. Consequently, any system that is 2014 certified [as a complete EHR system] should be able to support both Stage 1 and Stage 2 reporting," said Ms. Lee. Dr. Chiang continued: "Although many of the 2011 certification parameters will carry over, there are also new 2014 EHR certification criteria that are completely different from the 2011 certification criteria. These changes are designed to make the technology more usable and relevant," he said.

tion has existed since the beginning of the MU program. "Providers have always been allowed either to use a complete system or to combine multiple modules that, when integrated together, meet all of the certification criteria. For example, if your e-prescribing functionality is provided through one vendor and it satisfies the e-prescribing requirements under meaningful use—and you have a system that did not offer that functionality—you can combine the two and submit the information from both to CMS," said Julia Lee, JD, OCS, executive director of Ophthalmic Partners of Pennsylvania. The difference now is that your combined modules no longer have to meet all the

certification criteria, just the ones your EPs need to satisfy MU.

2014 Certification: An Overview

First, you must have a base EHR. A base EHR is one that is certified as having six capabilities, each of which may involve several criteria. All physicians participating in the meaningful use program, whether they're in Stage 1 or 2, must use a system that is certified as having these six capabilities, said Dr. Chiang.

1. Patient demographic and clinical

AAOE
AMERICAN ACADEMY
OF OPHTHALMIC EXECUTIVES®
Solutions for Practice Management

health information, such as medical history and problem lists

2. Ability to provide clinical decision support

3. Ability to support physician order entry

4. Ability to capture and query information relevant to health care quality

5. Ability to exchange and integrate electronic health information from other sources

6. Ability to protect the confidentiality, integrity, and availability of health information that is stored and exchanged

What do you need beyond a base EHR? Your EHR system also must be certified as capable of meeting the core and menu objectives that are necessary to satisfy the MU program's requirements—and these will vary depending on whether you are in Stage 1 or 2 of the program.

Certification is "complete" or "modular." If an EHR system is certified as "complete," then it meets all the minimum mandatory requirements for certification of an EHR system; but, because of the new flexible approach to certification, it may omit some things that a particular EP may need, such as the clinical quality measures for eye care. You also can take the "modular" approach, using either one certified module or a combination of certified modules to meet the minimum mandatory requirements. With either approach, it will be your responsibility to make sure your EHR system satisfies all the criteria that you need.

Check your vendor's 2014 certification status. The Office of the National Coordinator for Health Information Technology (ONC) has a comprehensive directory of certified complete EHRs and EHR modules: Go to http://oncchpl.force.com/ehrcert and select "2014 Edition."

Start Planning Now

Get it in writing. "Physicians have more leverage when negotiating a new contract as opposed to revising an existing agreement," said Jeffery Daigrepont, senior vice president at the Coker Group. "Sometimes a

vendor will guarantee certification, but the terms are typically broad. Incorporate specific language into your contract that details how the vendor will achieve certification and within what timeline it will occur. Likewise, if you are already bound to a contract, request an addendum or amendment to your contract that states that the vendor will stay current as the certification terms change." Practices can also include a caveat in their contract that allows them to suspend future payments to their vendor(s) if certification is not achieved prior to the deadline. This may help to offset any penalties incurred from CMS, said Mr. Daigrepont. (A free contract review from the Coker Group is available to AAOE members. Go to www.aao.org/ehr, and scroll down to "Vendor Contract Review.")

Communicate with your vendor. "If a vendor is legitimately working toward the new certification, they should already be sending regular updates to their clients about when they anticipate their updated release will be available and when they expect certification will occur," said Ms. Lee. "This gives practices a tentative timeline so they can start internally planning for the upgrade. Our vendor sends out a biweekly newsletter that details its anticipated timeline for different releases and versions."

Client demand will be a factor. How a vendor handles client demand will play a significant role in how quickly practices will be able to complete the transition. "Before these federal requirements were in place, upgrades were optional and generally done at a client's discretion. Now that the upgrades are mandatory, all of a vendor's clients will be attempting to upgrade at the same time, so it is important to know what resources from your vendor will be available to you and when. Work ahead as much as possible, and check with your vendor to find out if any hardware upgrades will be necessary," said Ms. Lee.

Shorter Reporting Period in 2014

Next year, EPs are only required to

report one calendar quarter of data in 2014. "This applies to everyone involved in the program, whether 2014 is your first year for participating in MU or it is your second, third, or fourth year," said Ms. Lee. "CMS granted this unique allowance because all EPs taking part in the EHR incentive program are required to upgrade to the 2014-certified version. It is a complicated process any time you do a large system upgrade. Workflows should be reevaluated and reconfigured, for example. Without this concession, it would be very difficult to both upgrade your system and gather an entire year's worth of data to report."

An Oct. 1 deadline for existing MU participants. Although this gives providers considerable leeway to implement the upgrade, a 2014-certified EHR system must be in place, and in use, no later than Oct. 1 (the first day of the fourth quarter in 2014) in order to report the required amount of data and qualify for the MU program.

A July 1 deadline for new MU participants. For newly participating EPs, the EHR system must be in place by July 1, 2014, in order to report the required amount of data and avoid the 1 percent MU penalty in 2015.

Once your upgraded system is in place, be sure to test all the required functionalities to ensure your data are complete before attempting to report your information to CMS. ∎

Michael F. Chiang, MD, chairs the Academy Medical Information Technology Committee and is professor of ophthalmology, medical informatics, and clinical epidemiology at Oregon Health & Science University, Portland. *Financial disclosure: Is an unpaid member of the scientific advisory board for Clarity Medical Systems.*

Jeffery Daigrepont is senior vice president at the Coker Group. Financial disclosure: Is employed by a consulting firm.

Julia Lee, JD, OCS, is executive director of Ophthalmic Partners of Pennsylvania. *Financial disclosure: Is a consultant for Alcon.*

Your Hour-by-Hour Guide to EHR Events in New Orleans

This year's Annual Meeting features almost 30 hours of programming devoted to EHRs, including 16 free events (Annual Meeting badge required), two Breakfast With the Experts roundtables (ticket required), and 12 instruction courses (Academy Plus course pass required).

You have until Oct. 23 to buy tickets and the course pass online. Go to www.aao.org/2013, select "Program Search," and log in. The course pass will be the first item listed; click

"Search Annual Meeting Events" to find specific events. Once you've found what you need, click "Add to Cart." After Oct. 23, you can only buy tickets and the course pass in New Orleans.

More online. You also can use the Program Search to find out about other IT-related events and to view abstracts for the events listed below.

Download handouts. Starting Oct. 16, you can visit www.aao.org/mobile to download all available handouts.

SATURDAY, NOV. 16

9-10 a.m. **Ocular Imaging Challenge Grant Winner Presentation: Estenda Solutions.** *Frederick Walsh.*
Where: The Electronic Office (Hall G, Booth 3851). Access: Free.

10-11 a.m. **Ocular Imaging Challenge Grant Winner Presentation: EyeDoc.** *Kubilay Cardakli, MD.*
Where: The Electronic Office (Hall G, Booth 3851). Access: Free.

12:30-1:30 p.m. **Privacy Breach: Now What? (Tech03).** *H. Jay Wisnicki, MD, Rainer Waedlich, and Neil H. Ekblom.*
Where: Technology Pavilion (Hall I1, Booth 5145). Access: Free.

SUNDAY, NOV. 17

7:30-8:30 a.m. **Big Data—Leveraging Analytics to Improve Your Bottom Line (B123).** *Jeffery Daigrepont.*
Where: Hall C. Access: Ticket required. (Limited to nine attendees.)

9-9:30 a.m. **The IRIS Registry: Ophthalmology's Moon Shot?** Learn about the IRIS (Intelligent Research in Sight) Registry, possibly the most significant project the Academy has ever undertaken. *Michael X. Repka (moderator) plus Michael F. Chiang, MD, Paul P. Lee, MD, David May, MD, PhD, and William L. Rich III, MD.*
This panel discussion takes place during the Opening Session (Sym 53; 8:30-10 a.m.). Where: The Great Hall. Access: Free.

9-10 a.m. **Ocular Imaging Challenge Grant Winner Presentation: Estenda Solutions.** *Frederick Walsh.*
Where: The Electronic Office (Hall G, Booth 3851). Access: Free.

10-11 a.m. **Ocular Imaging Challenge Grant Winner Presentation: EyeDoc.** *Kubilay Cardakli, MD.*
Where: The Electronic Office (Hall G, Booth 3851). Access: Free.

12:45-1:45 p.m. **Big Data Drives Better Outcomes—The Power and Benefits of the IRIS Registry (Sym57).** *Anne L. Coleman, MD, PhD, and William L. Rich III, MD (symposium cochairs).*
12:45-12:55 p.m.—**The Power of Big Data for Physicians.** *David May, MD, PhD, FACC.*
12:55-1:05 p.m.—**Alleviating Regulatory Burdens on Physicians.** *William L. Rich III, MD.*
1:05-1:15 p.m.—**Ease of Implementation of IRIS.** *John M. Haley, MD.*
1:15-1:25 p.m.—**Benefits of IRIS for the Subspecialist.** *Timothy Murray, MD.*
1:25-1:45 p.m.—**Q&A**
Where: La Nouvelle Ballroom C. Access: Free.

2-3 p.m. **An Approach to Selecting and Implementing EHRs in Your Practice (197).** *Michael V. Boland, MD, PhD (senior instructor), plus Michael F. Chiang, MD, Paulette Hottle, Michele C. Lim, MD, Flora Lum, MD, Brittney Wachter, CPC, OCS, and Linda L. Wedemeyer, MD.*
Where: Room 215. Access: Academy Plus course pass required.

2:30-3:30 p.m. **EHR 101 (Tech09).** *Colin A. McCannel, MD, FACS, and David Silverstone, MD*
Where: Technology Pavilion (Hall I1, Booth 5145). Access: Free.

3-5 p.m. **Celebrate the IRIS Registry Launch.** Grab some coffee and a freshly baked cookie, then view a demo of the

groundbreaking IRIS Registry, the nation's first comprehensive, EHR-based eye disease clinical registry.
Where: Academy Resource Center (Hall G, Booth 3239). Access: Free.

3:15-4:15 p.m. **Meaningful Use Stage 2 and How to Survive a Meaningful Use Audit (210).** *Jeffery Daigrepont (senior instructor) plus Kelsey Lang, MPP.*
Where: Room 291. Access: Academy Plus course pass required.

4:30-5:30 p.m. **Top 10 Success Tips for Your EHR Implementation (215).** *Joy Woodke, COE, OCS (senior instructor), plus Brittney Wachter, CPC, OCS.*
Where: Room 288. Access: Academy Plus course pass required.

4:30-5:30 p.m. **EHR and Image Data Management Implementation: Rapid-Fire Presentations and Panel Discussion (223).** *Rishi P. Singh, MD (senior instructor), plus Michael V. Boland, MD, PhD, David E. Silverstone, MD, and K. David Epley, MD.*
Where: Room 222. Access: Academy Plus course pass required.

4:30-5:30 p.m. **Impact of EHRs on Malpractice Claims Against Ophthalmologists (228).** *Paul Weber, JD (senior instructor), plus Sharon Brown*
Where: Room 295. Access: Academy Plus course pass required.

MONDAY, NOV. 18

7:30-8:30 a.m. **Big Data—Leveraging Analytics to Improve Your Bottom Line (B163).** *Jeffery Daigrepont.*
Where: Hall C. Access: Ticket required. (Limited to nine attendees.)

9-10 a.m. **Ocular Imaging Challenge Grant Winner Presentation: Estenda Solu-**

tions. *Frederick Walsh.*
Where: The Electronic Office (Hall G, Booth 3851). Access: Free.

9-11:15 a.m. EHRs: Compliance and Medicolegal Issues (302). *David E. Silverstone, MD (senior instructor), plus Kevin J. Corcoran and Michele C. Lim, MD.*
Where: Room 333. Access: Academy Plus course pass required.

10-11 a.m. Ocular Imaging Challenge Grant Winner Presentation: EyeDoc. *Kubilay Cardakli, MD.*
Where: The Electronic Office (Hall G, Booth 3851). Access: Free.

11 a.m.-noon. Using a Fully Integrated DICOM Imaging and EHR system (Tech12). *Jeffrey Marx, MD.*
Where: Technology Pavilion (Hall I1, Booth 5145). Access: Free.

11:30 a.m.-12:30 p.m. EHR Implementation: Overcoming Resistance to Change (347). *Joy Woodke, COE, OCS (senior instructor), plus Michele C. Lim, MD, and Colin A. McCannel, MD.*
Where: Room 291. Access: Academy

Plus course pass required.

12:30-1:30 p.m. Introducing the Academy's IRIS Registry: How to Meet Regulatory Requirements for Quality Measures (Tech13). *William L. Rich III, MD.*
Where: Technology Pavilion (Hall I1, Booth 5145). Access: Free.

12:45-1:45 p.m. Stage 2 of Meaningful Use: What You Need to Do to Qualify for Payment (Sym27). *Michael F. Chiang, MD (symposium chair).*
12:45 p.m.—**Timeline, Payment Adjustments, and Hardship Exemptions.** *Michael X. Repka, MD, MBA.*
12:55 p.m.—**Federal Perspective on Stage 2 of Meaningful Use: Benefits for Practitioners and Future Vision.** *Presenter to be determined.*
1:05 p.m.—**Stage 2 Meaningful Use: What Changes Are Most Relevant for Your Practice?** *Michael V. Boland, MD, PhD.*
1:15 p.m.—**Beyond Stage 2: What Do Ophthalmologists Need?** *Michael F. Chiang, MD.*
1:25 p.m.—**Q&A**
Where: New Orleans Theater C. Access: Free.

3:15-4:15 p.m. Questions About EHR Implementation? Ask Us! (394). *Julia Lee, JD, OCS (senior instructor), plus Joy Woodke, COE, OCS, and Robert E. Wiggins, MD, MHA.*
Where: Room 294. Access: Academy Plus course pass required.

4:30-5:30 p.m. Questions About "Meaningful Use" EHR Incentives? Ask Us! (412). *Julia Lee, JD, OCS (senior instructor), plus K. David Epley, MD, Kelsey Lang, MPP, Denise C. Fridl, COT, COE, and Joy Woodke, COE, OCS.*
Where: Room 288. Access: Academy Plus course pass required.

4:30-5:30 p.m. Toward the Electronic Practice (426). *Jeff Grant.*
Where: Room 297. Access: Academy Plus course pass required.

TUESDAY, NOV. 19

9-10 a.m. Digital Devices & Patient Care: Confidentiality, Encryption, HIPAA, and Ethical Considerations (510). *Christie L. Morse, MD.*
Where: Room 220. Access: Academy Plus course pass required.

9:30-10:30 a.m. Internet Privacy and Wireless Security Best Practices (Tech16). *Jonathon Santilli.*
Where: Technology Pavilion (Hall I1, Booth 5145). Access: Free.

10:15-11:15 a.m. Maximizing Your EHR System's Productivity and Financial Benefits (537). *Colin A. McCannel, MD (senior instructor), plus Rishi P. Singh, MD, Michael F. Chiang, MD, and Michele C. Lim, MD.*
Where: Room 355. Access: Academy Plus course pass required.

10-11 a.m. Ocular Imaging Challenge Grant Winner Presentation: EyeDoc. *Kubilay Cardakli, MD.*
Where: The Electronic Office (Hall G, Booth 3851). Access: Free.

10:15-11:15 a.m. EHRs: "Great Expectations" (544). *Jonathan Lohr.*
Where: Room 291. Access: Academy Plus course pass required.

Visit the Exhibition. **Almost 30 EHR vendors to visit.** To see who will be exhibiting, go to www.aao.org/2013 and click "Exhibition" to find the Virtual Exhibition. Also look for the guide to EHR products that will be published in the Friday/Saturday edition of *Academy News,* which will be distributed at the Annual Meeting.

Enjoy a 10-minute demo at The Electronic Office (Hall G, Booth 3851). Experience the value of integrating your EHR system with practice management systems, imaging devices, and other instruments. And learn about the Ocular Imaging Challenge.

Four reasons to visit the Academy Resource Center (Hall G, Booth 3239). Take advantage of Academy and AAOE resources, including:
1. Register for the IRIS Registry. Visit the IRIS Registry kiosk to learn how you can use your EHR data to benchmark your performance.
2. Sign up for a free 20-minute consult on EHRs. Visit the AAOE Practice Management Center to schedule a consultation with a practice management expert.
3. Integrate patient education materials into your EHR system. Talk to staff in the Patient Education area to learn how your EHR provider can incorporate Academy patient handouts and videos in your system.
4. Buy the book *Keys to EMR/EHR Success: Selecting and Implementing an Electronic Medical Record,* 2nd Edition ($139 for members; $188 for nonmembers).

Attend a presentation at the Technology Pavilion (Hall I1, Booth 5145). This year there are 17 presentations, addressing EHRs, smartphones, social media, data security, and much more. For a complete schedule, go to www.aao.org/2013, and select "Exhibition" and "Technology Pavilion."