



Certification Commission
for Healthcare
Information Technology

Panel: Medicare's PHR Choice Program & the Dawn of CCHIT PHR Certification

Moderator: Jody Pettit, MD

Strategic Work Group Leader, Personal Health Records, CCHIT

Western States Health-e Connection

Phoenix, AZ| March 2, 2009



Today's Topics

- CCHIT Background
- CCHIT's Personal Health Record Certification Process
- Future Challenges & How to Participate
- Q & A



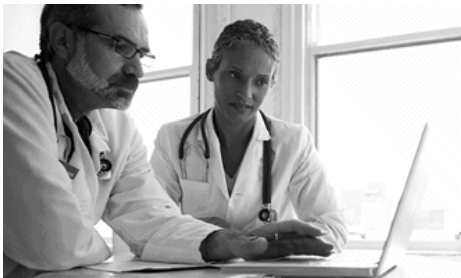
Certification: ensuring products work properly and safely



Electrical devices are tested and certified by Underwriters Laboratories (UL®)



Vehicles are crash-tested and rated by the Insurance Institute for Highway Safety



Healthcare information technology is inspected and certified by the Certification Commission (CCHIT®)



Mission and Goals

Mission:

Accelerate the adoption of robust, interoperable health IT by creating an efficient, credible certification process.

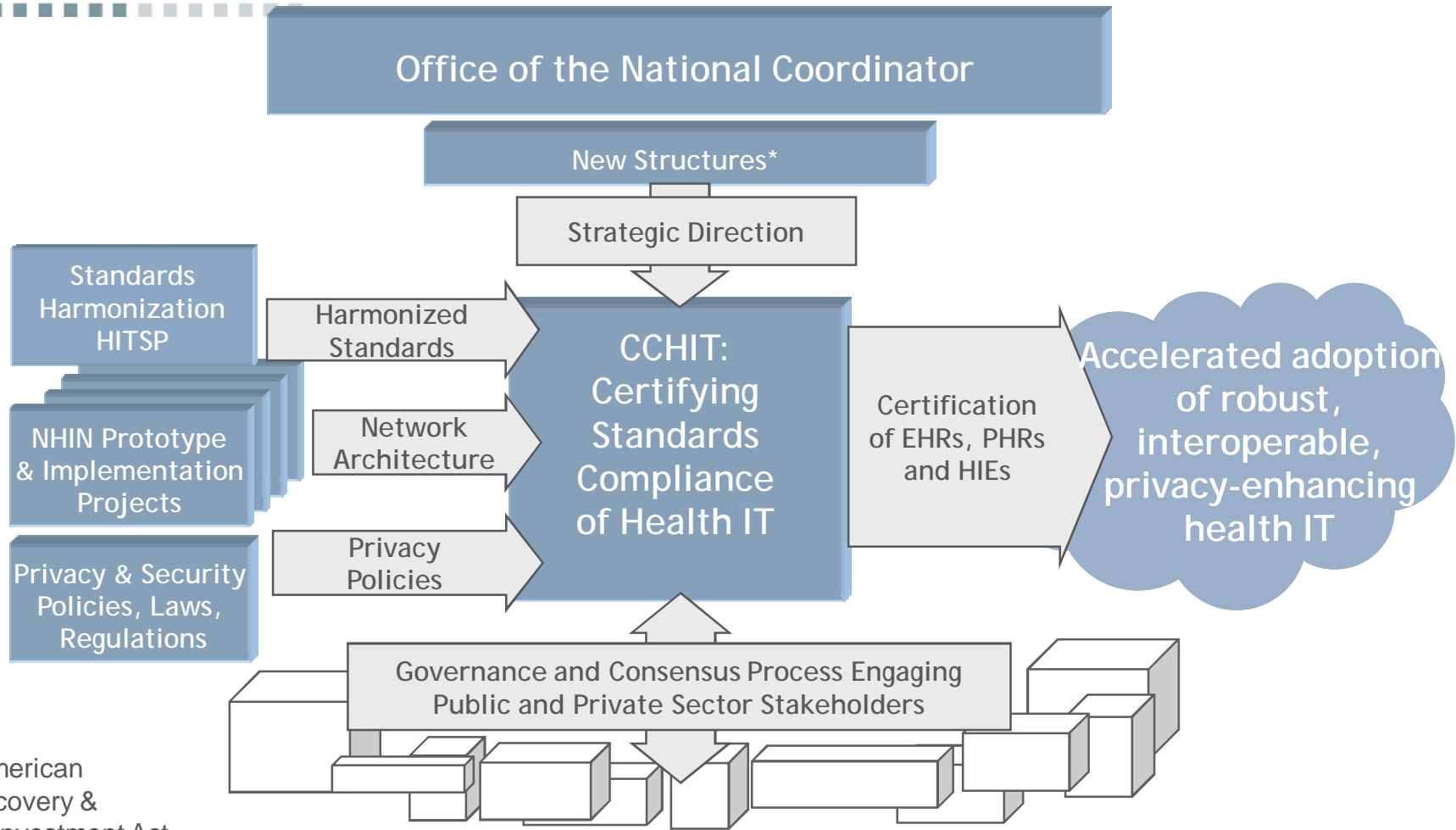
Goals:

- Reduce the risks of investing in health IT
- Facilitate interoperability of health IT
- Unlock adoption incentives and regulatory relief
- Protect the privacy of health information

A Federally Recognized Certification Body



Role of Health IT Certification

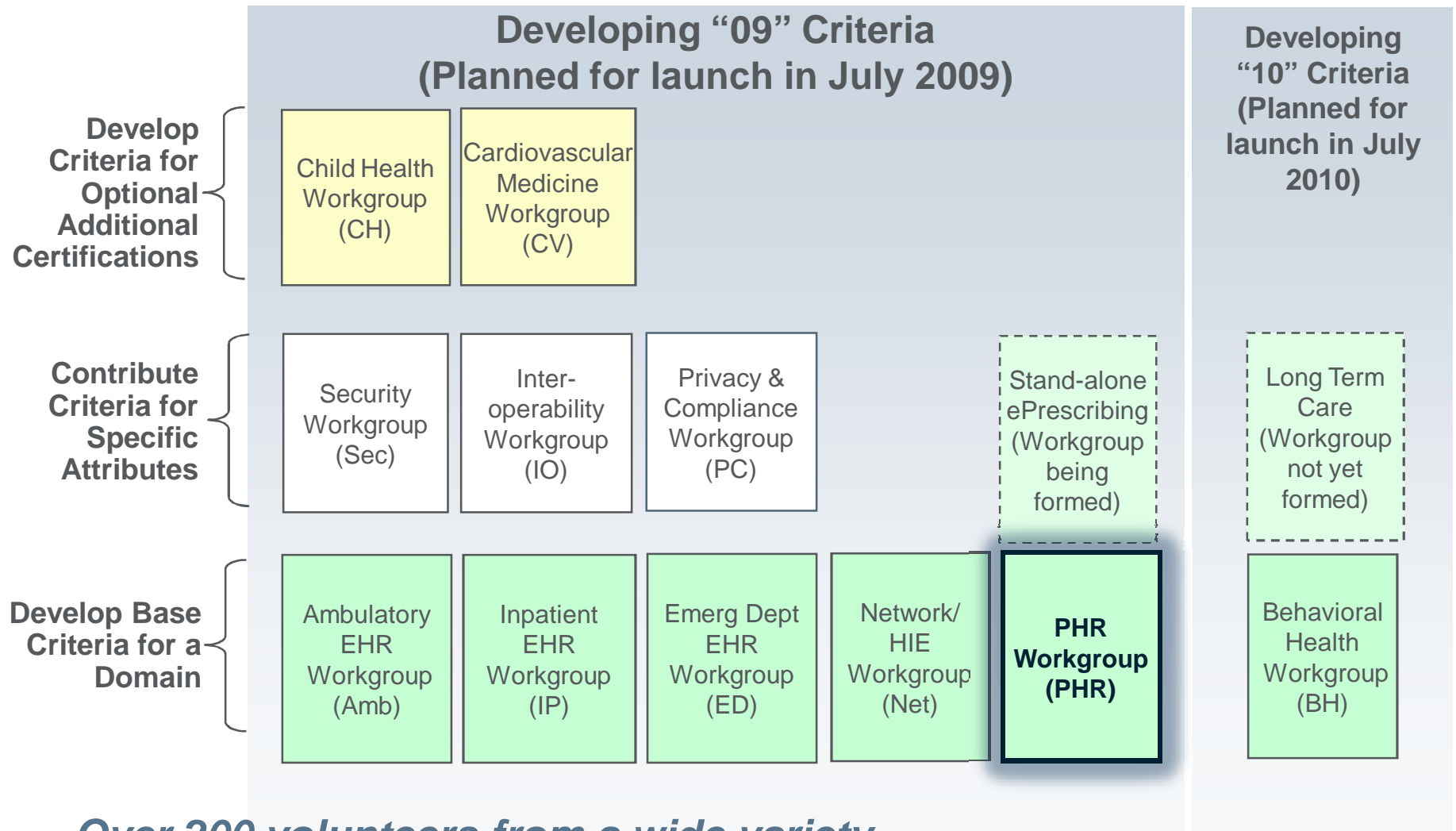


*American Recovery & Reinvestment Act of 2009)

Certification is a voluntary mechanism to accelerate the adoption of standards and interoperability



Volunteer Workgroup Organization



Over 200 volunteers from a wide variety of stakeholders

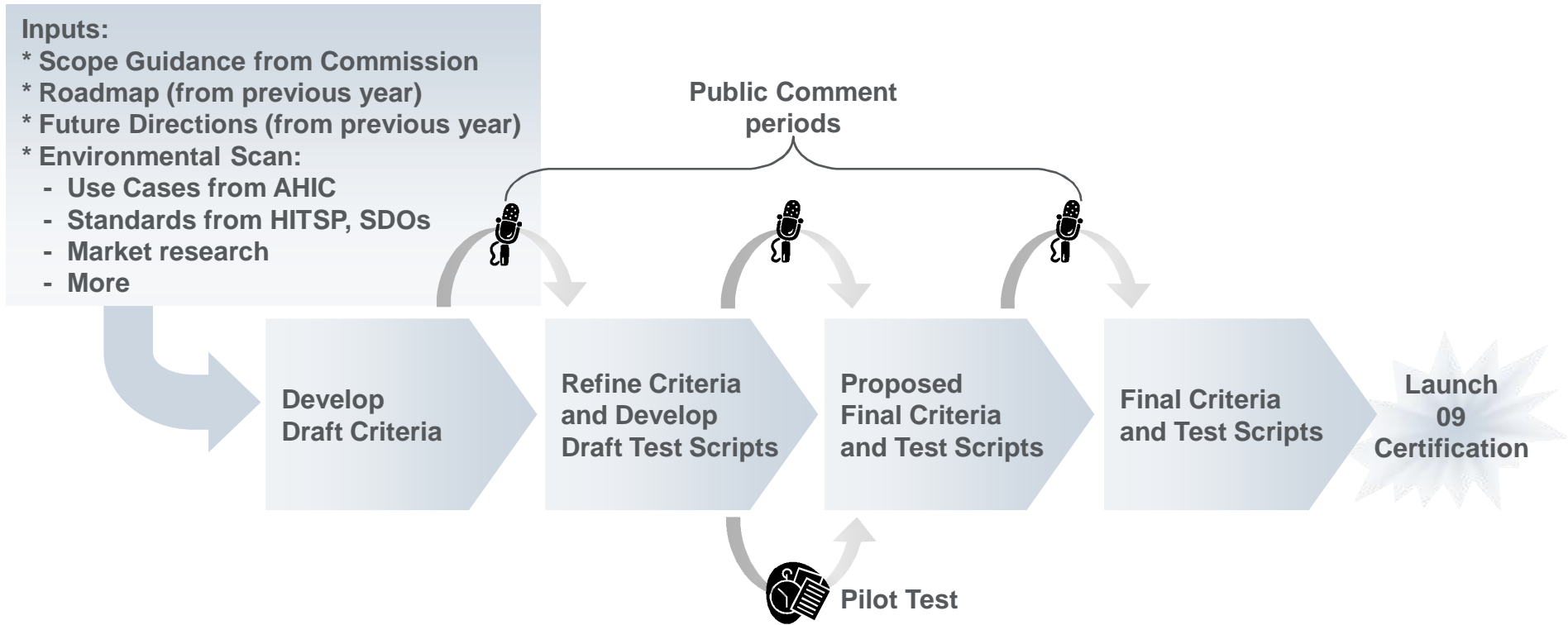


CCHIT's most important asset is the trust of its stakeholders

- Multi-stakeholder governance
- Openness and transparency
- Consensus-based decision processes
- Broad and diverse volunteer participation
- Multiple public input opportunities
- Stakeholder outreach and engagement



Criteria Development Process



A consensus-based process with many opportunities for broad input



Personal Health Record Certification





PHR Advisory Task Force

- **Mark Leavitt,* MD, PhD** (Co-Chair)
CCHIT
- **Paul Tang,* MD** (Co-Chair)
Vice President, Chief Medical Information Officer
Palo Alto Medical Foundation
- **Abha Agrawal, MD, FACP**
Director, Medical Informatics, Associate Medical Director,
Kings County Hospital Center, Brooklyn, NY
- **Richard D. Benoit**
Dossia Ecosystem Development, Director; Senior Program
Manager, Dossia and Intel Digital Health Group
- **Lorraine Tunis Doo, MPH, LEED AP**
Senior Policy Advisor, Office of e-Health Standards and
Services, CMS
- **Steve Findlay, MPH**
Health Care Analyst, Consumers Union
- **Meighan Girgus**
Executive Vice President, Healthcare Markets,
American Heart Association
- **Theresa Hancock, PAHM**
Acting Director, Office of Information, Veterans and
Consumers Health Informatics Office,
U.S. Department of Veterans Affairs
- **Leslie Harris**
President, Chief Executive Officer
Center for Democracy & Technology
- **Missy Krasner**
Product Marketing Manager, Google Health
- **Steve Lampkin, FACHE**
Vice President, Benefits Services & Strategic Initiatives
Wal-Mart Stores, Inc.
- **Holly Miller, MD, MBA**
Vice President, Chief Medical Information Officer
University Hospitals, Cleveland, OH
- **Donald Mon, PhD**
Vice President, Practice Leadership, AHIMA
- **Carl Phelps**
Patient representative
- **Anna Lisa Silvestre**
Vice President, Online Services,
Kaiser Foundation Health Plan
- **Michael Stokes**
Principal Program Manager, Microsoft Corporation
- **Michael Ubl**
Director, eHealth and IT Strategy Director, IT Strategy
and eHealth, Blue Cross Blue Shield of Minnesota

*Co-Chairs



Definition of PHRs for Purposes of Certification

- The Task Force reviewed PHR definitions offered by AHIMA, HIMSS, HL7 EHR TC, Markle Foundation Connecting for Health, and the NAHIT/HHS project
- The Task Force noted that:
 - The PHR space is still rapidly evolving
 - Certification should create a “big tent” that can accommodate diverse PHR models now and in the future
 - Certification should be architecture-neutral
 - Certification must avoid interfering with technology progress and market evolution
- The Task Force recommends that CCHIT should not attempt, and does not need, to wordsmith another definition of PHRs



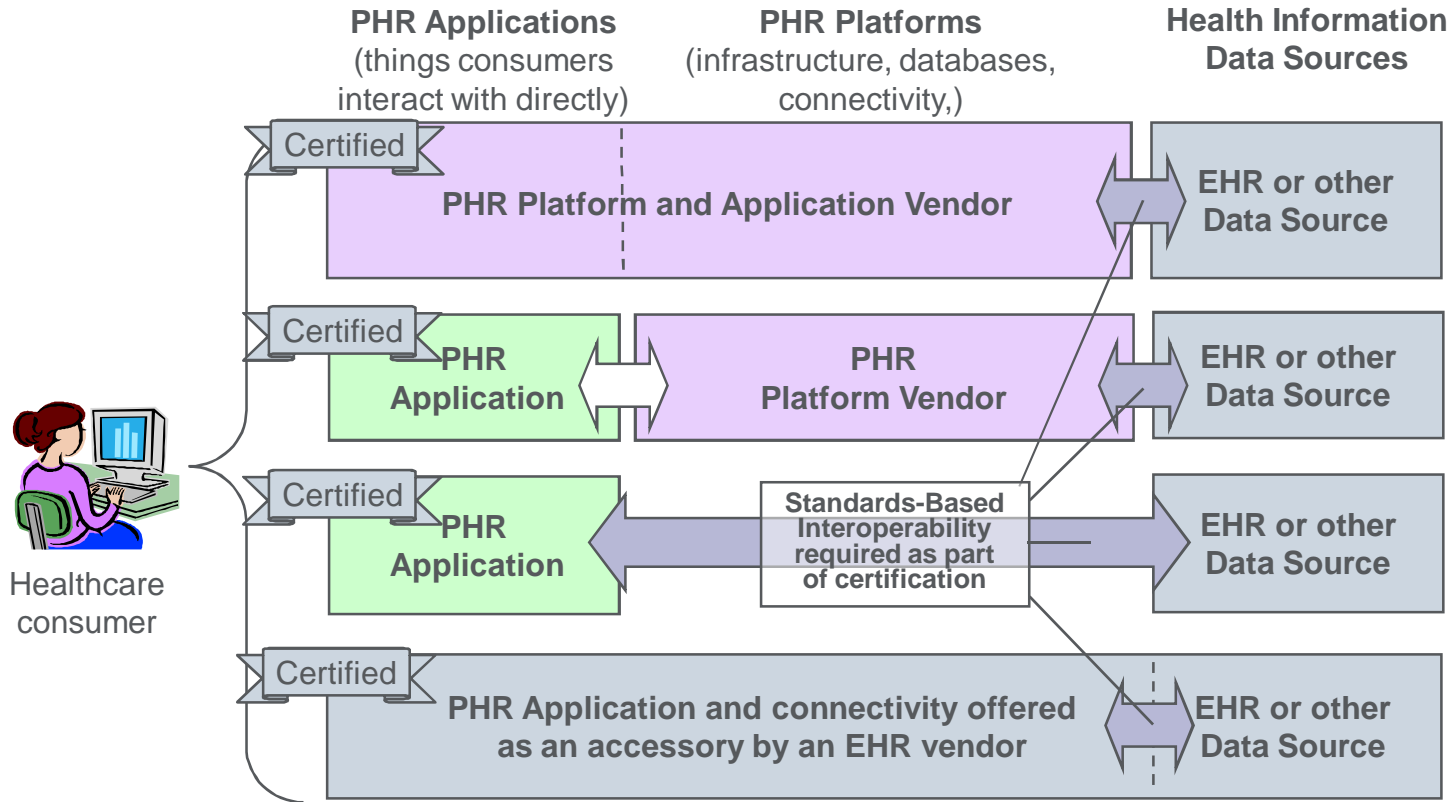
Products & Services to which Certification Should Apply

- The Task Force recommends that certification should apply to any products/services that perform either or both of these activities¹:
 - Collecting, receiving, storing, or using personal health information as part of a consumer data stream or PHR services.
 - Transmitting or disclosing to a third party any personal health information gathered through or derived from a consumer data stream or PHR services.

¹ “Connecting for Health Common Framework for Networked Personal Health Information: Overview and Principles” published by Markle Foundation Connecting for Health, www.connectingforhealth.org, June 2008



Accommodate Diverse Models in Certification





PHR Attributes to Certify: Privacy

- Privacy should be the #1 goal of certification -- the principal value certification can offer is to reduce concerns about privacy
- The Task Force recommends the Consumer Policy Practice Areas in the CfH Framework (CP1-CP9) be considered as a starting point for development of privacy criteria
- Privacy involves organizational policies and behavior, not just versions of software
 - Ongoing monitoring is needed
 - Strong enforcement is needed, including not just revocation of certification, but possibly long-term or permanent disqualification
 - Must give consumers the ability to compel removal or destruction of their stored data in the event certification is revoked
- New or stronger laws and regulations are needed in some privacy areas, and certification must be positioned so that it does not hinder that development



Healthcare Consumer Point of View

- Keep certification **simple for consumers**
 - Consumers associate the certified label with a ‘safety zone’ where information is private and secure
 - Must notify users if they are leaving that zone (e.g. clicking an external link)
- A **single** certification should assure the consumer that **all** desired attributes are satisfied: privacy, security, portability (interoperability), functionality



Priorities for 09 Certification

- Privacy
- Security
- Interoperability
- Functionality (only as it supports the top three)



PHR Work Group Volunteers

- **Ted Eytan,* MD MS MPH**, Medical Director, Health Informatics & Web Services, Group Health Cooperative
- **Lory Wood,* VP**, Chief Security and Compliance Officer, Good Health Network
- **Nicole Antonson, RN, MBA**, Program Manager, Patient Safety, McKesson
- **Suzie Burke-Bebee, MSIS, MS, RN**, Senior Health Informatician, Dept Health and Human Services
- **Albert Chan, MD, MS**, Physician Champion of Electronic Health Record and PAMFOnline, Sutter Health, Palo Alto Medical Foundation/Palo Alto Foundation Medical Group
- **Haris Domazet**, Division Lead of Web Technical Services, Epic Systems Corporation
- **Donna DuLong, RN, BSN**, Program Director, TIGER Initiative
- **Paul Edge**, VP, Clinical Solutions, Misys Healthcare Systems
- **Michael Galang, DO, MS**, Chief Medical Information Officer, Catholic Health System of Western New York
- **Lenel James, BS, MBA**, Senior Project Manager, Blue Cross and Blue Shield Association
- **Jerry Lin**, Product Manager, Google
- **Cortney Nicolato**, Senior Manager, Strategic Alliances & Health IT, American Heart Association National Center
- **Jan Oldenburg**, Practice Leader, Kaiser Permanente
- **Juhan Sonin**, Designer, MITRE
- **Stelle Smith**, Clinical Product Marketing Manager, Sage Software
- **James Tosone**, Director, Healthcare Informatics, Pfizer Inc
- **Lawrence Williams**, President / CEO, Roadside Telematics Corporation
- **Julie Wolter, MA, RHIA**, Assistant Professor, Saint Louis University

*Co-Chairs



PHR Certification Issues

- Certifying Policy
 - Certifying software products or services vs. operations and implementation
 - Bears on protecting privacy
 - May require auditing
- Privacy as “Transparency”
 - Privacy Facts labeling
 - Concept: like nutrition facts on a food label
 - An HHS recommendation



Nutrition Facts At a Glance

Nutrition Facts			
Serving Size 2 cup (228g)			
Servings Per Container 2			
Amount Per Serving			
Calories 250	Calories for Fat 110		
% Daily Value*			
Total Fat 12g	18%		
Saturated Fat 3g	15%		
Trans Fat 0g	0%		
Unsaturated Fat 0g	0%		
Cholesterol 30 mg	10%		
Sodium 470g	20%		
Total Carbohydrate 31g	10%		
Dietary Fiber 0g	0%		
Sugars 5g			
Protein 5g			
Vitamin A 4%	Vitamin C 2%		
Calcium 20%	Iron 4%		
*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:			
Calories:		2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g



PHR Facts At a Glance

Facts about your personal information

Why do we provide you with this information?

We provide this information because we want you to clearly understand [Vendor]’s policies, practices, and procedures for using, securing, and protecting the personal information in your PHR. The table below provides you a snapshot. You can link to more detailed information by clicking on any of the areas below.

PHR Facts At-A-Glance		Our Practices
PHR Type	Provided by	
	Fee	
Who can view your personal information?	You	
	Family and friends	
	Healthcare providers	
	Insurers	
	Employers	
	Pharmacies	
	Additional health programs and services	
	[Vendor]	
	Others	



PHR Dividing Lines

Differences between linked and independent

- Opt-in/opt-out & open/close issues
- Expungement issues
- Operating under HIPAA & PTO exception or not
- Consent vs. Authorization
- Access control issues
- System administrator functions vs. account holder functions

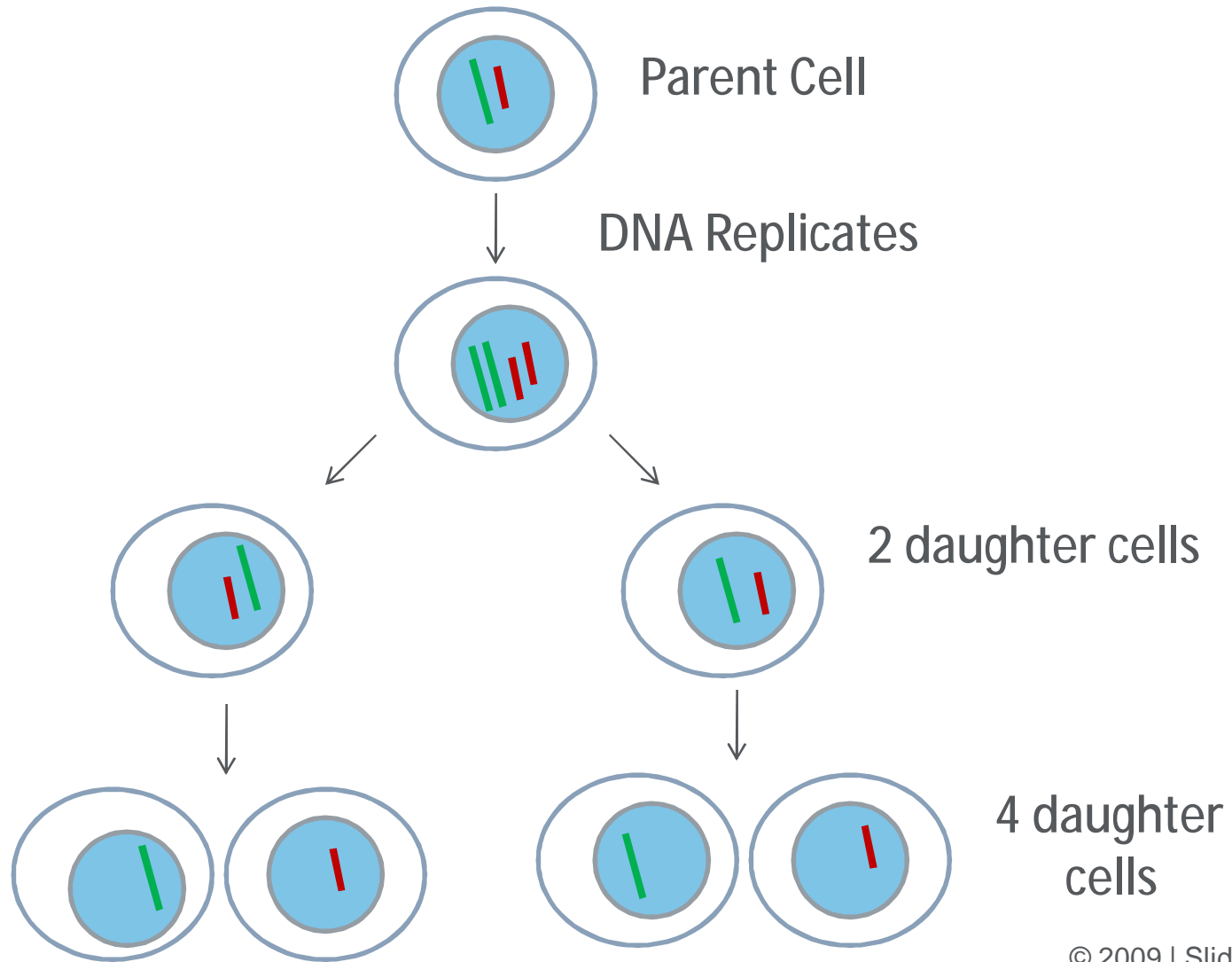


PHR Dividing Lines: some examples

- Access control issues,
 - Linked ‘internal’ access vs. ‘external’ access (e.g., designees – family members, others)
 - Organization vs. individual
 - Level of granularity: restricting access by data type and individual and/or role
- System administrator functions vs. account holder functions
 - Generate audit report: request from SA or DIY online
 - Amendment example: request from SA or DIY online [*stopped short of document integrity issues*]

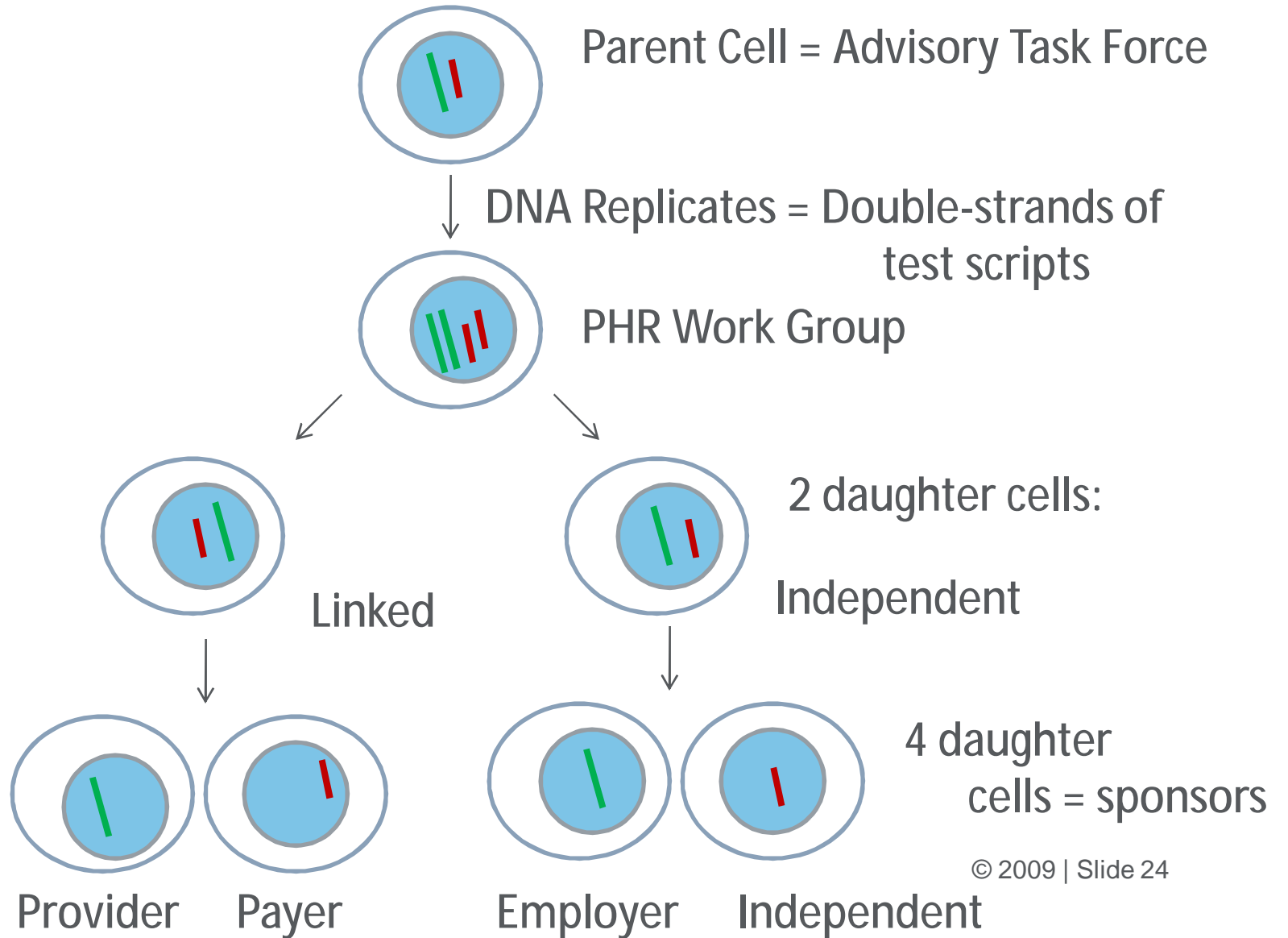


Meiosis





PHR Certification Process





Tentative Privacy Plan

- 2 certifications: linked and independent
 - tested differently re: privacy
 - tested the same re: security and interoperability
- Focus group testing to test understandable names
- CCHIT Certified® labeling that is consumer-friendly
- HHS Privacy Facts At a Glance label on BOTH
- American Recovery and Reinvestment Act of 2009
 - *will reconcile PHR certification with the new provisions of the law*



Outreach to Consumers

- Consumer representation on the Task Force and PHR Work Group
- Town Call teleconference re: PHR certification
- Public comment periods
- phrdecisions.com – a consumer-friendly Web channel



Review and Comment on Criteria & Test Scripts

CCHIT Certification Commission for Healthcare Information Technology

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PARTICIPATE

Overview
Work Groups
Jurors
Commissioners

RELATED LINKS

Inpatient Work Group
Security Expert Panel
Interoperability Expert Panel

Certification Commission materials for public comment

The first draft of the 09 certification criteria has been published as six individual PDF documents (Ambulatory, Cardiovascular, Child Health, Emergency Department, Inpatient and Personal Health Records). These documents represent the different individual certification tracks that will be offered for 09 certification. The documents contain certification criteria from the core work group and may also contain Foundation, Interoperability, Privacy & Compliance and Security criteria.

The public comment period is open through October 28, 2008.

Materials for comment

[Click here to download all of the materials for public comment—including native file formats—in a single Zip file](#)

9/29/2008	Introduction to CCHIT Certified 09 First Draft Criteria	
9/29/2008	Ambulatory EHR 09 Criteria (Draft 01)	
9/29/2008	Personal Health Record (PHR) 09 Introduction	
9/29/2008	Personal Health Record (PHR) 09 Criteria (Draft 01)	

To participate in the public comment process

1. Carefully review the material above. If you have extensive comments, you are encouraged to prepare those comments in advance. Associate each comment with the specific item number for the item.
2. [Click here to register to submit comments.](#) You will be prompted to create a User Name and Password. (NOTE: If you have registered to submit comments during a previous round, your User Name and Password are still active. Please skip this step.) Make a note of these as you will need them if you wish to

Visit www.cchit.org/participate/public-comment

Download the PHR 09 Introduction and Criteria documents

Follow links farther down the page to submit your comments

*Note:
Public comment on final PHR criteria & test scripts
March 30 – April 28*



Visit phrdecisions.com

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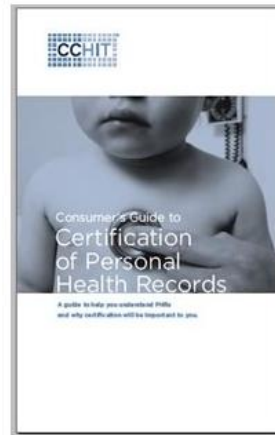
Personal Health Records (PHR) information and news for consumers from

Consumer's guide to CCHIT PHR certification

by CCHIT STAFF

What does the CCHIT certification of PHR mean?

It's a reasonable question. And that's why the Certification Commission created the [Consumer's Guide to Certification of Personal Health Records](#), a quick overview of certification—and its benefits—written with consumers in mind.



Today's consumers want better access to their personal health information and that of their families. They also want to decide who to share it with, and under what circumstances. In our electronic age, patients can have the power to access and control their own personal health record. There are now dozens of organizations that offer systems for accumulating and storing personal health information, either online, on a personal computer, or on the computer systems of health care providers.

Certification is designed to make sure that these products meet a minimum level of security, interoperability, and functionality.

You're invited

Join the Certification Commission for a Town Call discussing PHR and certification, October 10.

[Click here](#) for details.

Download the Consumer's Guide to PHR Certification

BROUGHT TO YOU BY



36 readers
BY FEEDBURNER

To search, type and hit enter

GET PHR DECISIONS BY EMAIL

Enter your email address:

CONSUMER'S GUIDE TO CERTIFICATION OF PERSONAL HEALTH RECORDS

Download the [Consumer's Guide to Certification of Personal Health Records](#), a quick overview of certification—and its benefits—written with consumers in mind.



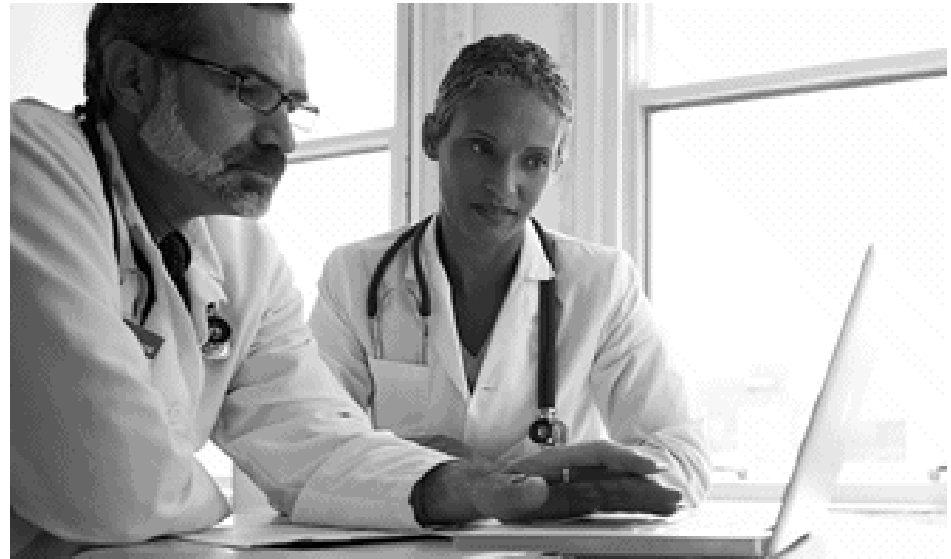
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Future Challenges & How to Participate in the Process





Future Challenges

Understanding and incorporating the privacy provisions of the HITECH Act in the ARRA of 2009

Some examples:

- Definitions
- Electronic copies to individuals
- Business associate contracts
- Breach notification
- Disclosure and sale of personal health information



Opportunities to Participate

- Work group applications open Mar 23 – Apr 20
- Commission nominations open every July
- Public comment periods (30 days) open in September, December, and March
- Town Call teleconferences on specific topics
- Town Halls at major meetings
 - Apr 5-6, HIMSS09

Watch www.cchit.org for announcements of events

Sign up for CCHIT eNews at the website



Sponsorship of Models:

	Linked	Independent
Provider	Yes	Yes
Payer	Yes	Yes
Employer	No	Yes
Independent	No	Yes