



FROM THE CHAIR, November 2010



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The Early Adopter's Dilemma

Approximately 25% of physicians nationwide had already invested in an EHR at the time that the Office of the National Coordinator's (ONC) certification criteria and the Center for Medicare and Medicaid Services' Meaningful Use objectives and measures for incentive payments were first discussed. While the subsequent regulation provided fairly clear direction for those who were looking to adopt newly certified EHR technologies, it also raised questions for those physicians who had already made significant investment through early adoption. Would their systems be "certified" by the vendor who sold them the product? Would their earlier investments, encouraged by other programs, preclude them from earning meaningful use incentive payments? How could they assure their eligibility for incentive payments? What would be the additional cost?

As always, there are no easy answers to these questions. There are, however, some guidelines that should prove useful if you purchased, installed and implemented an EHR prior to the new program rules, depending on the product and your vendor.

For CCHIT Certified® 2011 products:

- If you purchased a CCHIT Certified 2011 product prior to the publication of the final criteria and ONC's Authorized Testing and Certification 2011/2012 program *and* your vendor has subsequently certified its product under the new program, you have a good

chance of getting the necessary minor upgrades from your vendor so that your current EHR will fulfill the certification requirement. This anticipated update was, hopefully, included in your EHR sales contract so that you know what to expect and when. If this was not in your original contract, negotiate the best deal you can *now* to get what you need.

- Your vendor may have certified your already purchased and installed EHR as an EHR module rather than as a complete EHR. ONC's final rule included some new criteria for eligible providers that were not part of CCHIT's 2011 criteria: quality measure calculation and reporting, display of a patient summary in the Clinical Care Record (CCR) format, and ability to send syndromic surveillance and immunization information as specified by the federal government. Your version may be missing these and your vendor may not be planning to upgrade it to include them. Or your vendor may plan to certify a separate EHR module to meet those criteria. If your vendor goes this route, make sure that it also integrates these new functions with the rest of your CCHIT Certified 2011 EHR functions, since integration is *not* required as part of ONC's certification testing. Or you could fill this gap by purchasing another vendor's EHR module to meet the missing criteria.

- If your vendor has not yet tested in the ONC-ATCB program, ask them when they plan to do that.

For older products:

If you have an EHR certified by CCHIT prior to 2011, or one that was never certified, your vendor may not want to take it through the ONC-ATCB 2011/2012 certification process, preferring to sell you one of its newer certified products. All is not lost, but getting this product to ONC-ATCB certification will take some work on your part.

- There is strength in numbers -- work with others in your users' group to assure that your vendor can and will certify as much of the product as can be certified to the new criteria. You will all end up with an ONC-ATCB certified EHR module to which can be added other ONC-ATCB certified products as necessary to assure that you have an EHR certified to all 33 criteria. This does mean, however, that you will have to find vendors who can supply you with modules covering the missing criteria. Those certified EHR modules will be listed on CCHIT's [website](#) (for those that are ONC-ATCB certified by CCHIT) and all will be on ONC's [Certified Health IT Products List](#).

Remember: You bear the burden of integrating these modular products to meet the needs of your practice. The ONC-ATCB program does not test for integration.

- If you were considering a change anyway, this may be the time to do it, moving to either your vendor's new ONC-ATCB certified product or another vendor's certified product. If you are in general medicine or a medical subspecialty, you will want to

consider a dually certified product: CCHIT Certified® 2011 *and* ONC-ATCB certified for greater assurance that it will meet your patient care needs *and* provide the first step in eligibility for incentive payments.

- Your third option is to forgo Stage One incentive payments and wait for Stage Two. There will be a new set of certification criteria and a whole new certification process. Crunch your numbers to determine whether you are better off investing in new systems or additional technologies now or simply waiting another year or two.

Caution: It can take a year or more to research, buy, install, and fully implement an EHR, and more time beyond that to modify practices and workflows required by the definition of 'meaningful use'. Although the incentive program runs through 2015, late starters receive lower incentives and have less time to step up to more advanced stages of meaningful use. The sooner you begin the process, the greater your chances of qualifying for and receiving the maximum incentives available.

And don't forget the most important thing that should be driving your choices: make sure your technology works for you as you care for your patients. This generally means assuring that your system works as an integrated systemnot as a collection of distinct functions (or modules) that don't work together. So if you do go the multiple EHR module route, either plan on figuring out the integration yourself, or be sure you know what it will cost for someone else to do it for you. Your [Regional Extension Center](#) should be able to advise you on the best course.