NOV 19 2018

Dear Tribal Leader and Urban Indian Organization Leader:

I am writing to provide an update on the Agency's progress in certifying the suite of applications that comprise the Indian Health Service (IHS) Resource and Patient Management System (RPMS) to meet certification criteria and standards specified in the 2015 Edition Health Information Technology (Health IT) published by the Office of the National Coordinator (ONC)[1].

For hospitals or clinicians that participate in any of the various quality or incentive payment programs sponsored by the Centers for Medicare & Medicaid Services (CMS), the 2018 calendar year is the last reporting period for which eligible hospitals, critical access hospitals, and eligible clinicians (also referred to as eligible professionals) can use 2014-certified Health IT to qualify for incentives or avoid payment adjustments associated with these programs.

The IHS Office of Information Technology (OIT) will not have met all certification requirements by the time that reporting is due for the 2019 calendar year. I am providing the following information on 2015 Edition Health IT certification planning at the IHS, the impacts of non-certification in 2019, and mitigation recommendations.

I.   **2015 Edition Health IT Certification Planning**

The IHS approach to 2015 Edition Health IT certification of the RPMS suite of applications will be different than past certifications (in 2011 and 2014).

Instead of providing a certification that includes the entire suite of RPMS Electronic Health Record (EHR) software applications together, in 2019, the IHS will pursue "modular" certifications. This will allow the OIT to prioritize functions that are most important to RPMS users for either clinical or operational reasons, and develop and certify those functions earlier in the process.

In addition, the OIT is exploring the possibility of integrating certain third-party and/or commercially certified modules that can be implemented with modest effort and minimal disruption, to shift some of the certification requirements to external vendors.

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[1] 2015 Edition Health Information Technology (Health IT) Certification Criteria, 2015 Edition Base Electronic Health Record (EHR) Definition, and ONC Health IT Certification Program Modifications Final Rule, 80 FR 62601, October 16, 2015.

2015 Edition Health Information Technology (Health IT) Certification Criteria, 2015 Edition Base Electronic Health Record (EHR) Definition, and ONC Health IT Certification Program Modifications Corrections and Clarifications – December 11, 2015

As presented at the recent IHS Partnership Conference in Phoenix, Arizona, on July 31-August 1, 2018, the high-level approach to 2015 Edition Health IT certification will be as follows:

A.   Certification of RPMS eCQM Reporting Tool. As an update since the conference, the RPMS eCQM Reporting Tool was certified to the 2015 Edition in August 2018.

B.   Focus on certification requirements for high-priority clinical functions in the RPMS, including:

1.   **Electronic Prescribing enhancements**, specifically those that allow providers to see whether e-prescribed medications have been picked up and have timely refills.

2.   **Immunization Data Exchange**, specifically importing data from multiple disparate state immunization registries into RPMS.

3.   **Support for Sexual Orientation and Gender Identity** (SOGI) recording in a manner that ensures sensitive collection of SOGI information and its reuse as part of efforts to provide safe, welcoming, and culturally competent care to these underserved and high risk populations.

C.   Evaluation of third-party products to replace and enhance the functions of the RPMS Network, including capabilities such as Health Information Exchange, Master Patient Index, and Personal Health Records. The goal is to enhance the portability of data across systems and more effectively support secure access to health records by patients and providers.

D.   Development and release of additional certified RPMS modules, prioritized according to importance to RPMS users, in consideration of value, impact, cost, and available resources. Completion is targeted at the end of Fiscal Year (FY) 2020.

II.   **Impacts of Non-Certification in 2019**

Eligible hospitals and eligible clinicians that use RPMS will not have all components of 2015 Edition Health IT certification criteria in place by the time attestation for the 2019 reporting period takes place in early calendar year 2020.

Many sites will see some degree of impact beginning in 2021. These impacts will vary widely depending on the programs in which eligible hospitals and eligible clinicians are participating. These impacts could range from missing incentive payments, to not receiving upward payment adjustments (typically a few percent) on Medicare claims.

Based on research using 2016 collections data conducted by IHS Quality Health Care Program leadership and the Office of Resource Access and Partnerships, we estimate that the total financial impact to RPMS customers nationwide in calendar year 2021 will likely exceed $3 million. While this amount is considerably less than the anticipated cost to the Agency to complete 2015 Edition Health IT certification, we recognize that any missed opportunity to maximize revenue at sites is undesirable.

III.   **Mitigation Recommendations**

There are several steps that can be taken to reduce the impacts of not using fully certified Health IT in 2019. Specifically:

A.   Eligible hospitals and eligible clinicians can apply to the programs in which they participate, requesting hardship exceptions or extraordinary circumstance exceptions due to the fact that 2015 Edition certified Health IT is not available to them for all of the modules that they need.

B.   Various third parties offer registries that receive data from EHR systems used by eligible clinicians, calculate this information, and submit Clinical Quality Measure results to the appropriate programs. Although not a substitute for a fully certified Health IT suite, those sites with eligible clinicians participating in quality payment programs dependent on Clinical Quality Measure submission may wish to explore those options. A list of Merit-Based Incentive Payment System CMS-Approved Qualified Clinical Data Registries and Qualified Registries can be found online at https://www.cms.gov/Medicare/Quality-Payment-Program/Resource-Library/Resources-by-topic.html.

We hope this information is useful to our RPMS customers. The IHS is committed to achieving regulatory compliance while addressing solutions in support of the IHS mission. If you have questions about the approach to 2015 Edition Health IT certification for RPMS, OIT will be hosting a series of three web forums during FY 2019 that will provide an opportunity for clarification and feedback. The web forum dates will be announced on the IHS Calendar of Events at https://www.ihs.gov/ihscalendar/. Additional up-to-date information on the ONC 2015 Edition Health IT certification can be found at https://www.healthit.gov/topic/certification-ehrs/certification-health-it.

If you have any questions, please contact Mr. Mitchell Thornbrugh, Acting Chief Information Officer and Director, OIT, IHS, by telephone at (301) 443-2019 or by e-mail at mitchell.thornbrugh@ihs.gov.

Sincerely,

/Michael D. Weahkee/

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