Test Procedure for §170.304 (d) Patient Reminders

This document describes the draft test procedure for evaluating conformance of complete EHRs or EHR modules[1] to the certification criteria defined in 45 CFR Part 170 Subpart C of the Final Rule for Health Information Technology: Initial Set of standards, Implementation Specifications, and Certification Criteria for Electronic Health Record Technology as published in the Federal Register on July 28, 2010. The document[2] is organized by test procedure and derived test requirements with traceability to the normative certification criteria as described in the Overview document located at http://healthcare.nist.gov/docs/TestProcedureOverview_v1.pdf. The test procedures may be updated to reflect on-going feedback received during the certification activities.

The HHS/Office of the National Coordinator for Health Information Technology (ONC) has defined the standards, implementation guides and certification criteria used in this test procedure. Applicability and interpretation of the standards, implementation guides and certification criteria to EHR technology is determined by ONC. Test procedures to evaluate conformance of EHR technology to ONC's requirements are defined by NIST. Testing of EHR technology is carried out by ONC-Authorized Testing and Certification Bodies (ATCBs), not NIST, as set forth in the final rule establishing the Temporary Certification Program (*Establishment of the Temporary Certification Program for Health Information Technology, 45 CFR Part 170; June 24, 2010*.)

Questions about the applicability of the standards, implementation guides or criteria should be directed to ONC at ONC.Certification@hhs.gov. Questions about the test procedures should be directed to NIST at hit-tst-fdbk@nist.gov. Note that NIST will automatically forward to ONC any questions regarding the applicability of the standards, implementation guides or criteria. Questions about functions and activities of the ATCBs should be directed to ONC at ONC.Certification@hhs.gov .

CERTIFICATION CRITERIA

This Certification Criterion is from the Health Information Technology: Initial Set of Standards, Implementation Specifications, and Certification Criteria for Electronic Health Record Technology Final Rule issued by the Department of Health and Human Services (HHS) on July 28, 2010.

§170.304 (d) Patient Reminders. Enable a user to electronically generate a patient reminder list for preventive or follow-up care according to patient preferences based on, at a minimum, the data elements included in:

- Problem list;
- Medication list;
- Medication allergy list;

[1] Department of Health and Human Services, 45 CFR Part 170 Health Information Technology: Initial Set of Standards, Implementation Specifications, and Certification Criteria for Electronic Health Record Technology, Final Rule, July 28, 2010.

[2] Disclaimer: Certain commercial products are identified in this document. Such identification does not imply recommendation or endorsement by the National Institute of Standards and Technology.

- Demographics; and
- Laboratory test results

Per Section III.D of the preamble of the Health Information Technology: Initial Set of Standards, Implementation Specifications, and Certification Criteria for Electronic Health Record Technology, Final Rule where the patient reminders certification criterion is discussed:

- "…we expect Certified EHR Technology to be capable of generating a patient reminder list for an eligible professional and his/her staff. The meaningful use measure establishes the requirement for an eligible professional to take action once the reminder list has been generated."

Per Department of Health and Human Services, Centers for Medicare & Medicaid Services, 42 CFR Parts 412, 413, 422, and 495, CMS-0033-F, RIN 0938-AP78, Medicare and Medicaid Programs; Electronic Health Record Incentive Program, Final Rule:

- "In order to avoid unnecessary confusion and duplication of requirements, EPs meet the aspect of "per patient preference" of this objective if they are accommodating reasonable requests as outlined in 45 C.F.R. 164.522(b), which are the guidance established under HIPAA for accommodating patient requests."
- "45 CFR 164.522(b)(1) *Standard: Confidential communications requirements.* (i) A covered health care provider must permit individuals to request and must accommodate reasonable requests by individuals to receive communications of protected health information from the covered health care provider by alternative means or at alternative locations."

INFORMATIVE TEST DESCRIPTION

This section provides an informative description of how the test procedure is organized and conducted. It is not intended to provide normative statements of the certification requirements.

This test evaluates the capability for a Complete EHR or EHR Module to electronically generate a patient reminder list for preventive or follow-up care including patient confidential communications preferences based on, at a minimum, the data elements included in the problem list, medication list, medication allergy list, demographics, and laboratory test results.

The vendor will identify in the Complete EHR or EHR module:

- The specific patient reminders that can be generated
- If the implementation supports a reminder list for a specific patient, or for a list of patients to be presented to the eligible provider
- The method for displaying the patient reminder list

While this criterion does not include requirements for documenting in the EHR that the reminders have been communicated to the patient, a separate criterion *170.302 (n) Automate measure calculation* describes the requirements for calculating and reporting the associated percentage-based measure. The automatic capturing of reminders sent to patients could be used to aid in this calculation.

The Vendor supplies the test data for this test procedure.

This test procedure consists of one section:

- Generate Patient Reminder List – evaluates the capability to generate a patient reminder list for an Eligible Provider and their staff regarding preventive or follow-up care
    - The Tester generates a patient reminder list for preventive or follow-up care which includes patient confidential communications preferences and based on the data elements included in the problem list, medication list, medication allergy list, demographics, and laboratory test results
    - The Tester validates that the reminder list is generated and is accurate and complete based on vendor supplied data

REFERENCED STANDARDS

None

NORMATIVE TEST PROCEDURES

Derived Test Requirements
DTR170.304.d – 1: Generate patient reminder list

DTR170.304.d – 1: Generate patient reminder list
Required Vendor Information

VE170.304.d – 1.01: Vendor shall identify two or more patients with an existing record in the EHR to be used for this test, each of which includes the following data – patient confidential communications preferences, patient problems, medications, medication allergies, demographics (age & gender), and laboratory test results

VE170.304.d – 1.02: Vendor shall identify the patient reminders (e.g., INR every 4 weeks) available in the EHR that can be generated based on patient problems (e.g., Mitral Valve Replacement), medications (e.g., Coumadin (warfarin)), medication allergies (e.g., Erythomicyn, Aspirin), demographics (e.g., age, gender, preferred language), and laboratory test results (e.g., INR: 3.0). Vendor shall describe the selection logic implemented in the EHR for these reminders

VE170.304.d – 1.03: Vendor shall identify the EHR function(s) that are available to select, generate and display the patient reminder list for the patients identified in VE170.304.d – 1.01

Required Test Procedure:

TE170.304.d – 1.01 Using the EHR function(s) identified by the Vendor, the Tester shall select, generate and display the patient reminder lists based on the data elements included in the problem list, medication list, medication allergy list, demographics,

and laboratory test results for each of the patients identified in VE170.304.d – 1.01

TE170.304.d – 1.02: Using the NIST-supplied Inspection Test Guide, the tester shall verify that the patient reminder list is generated correctly based upon the data elements included in the problem list, medication list, medication allergy list, demographics, and laboratory test results for each of the patients identified in VE170.304.d – 1.01 correctly and without omission

Inspection Test Guide

IN170.304.d – 1.01: Tester shall verify that the patient reminders generated during the test are consistent with the Vendor-supplied patient data and the Vendor-defined selection logic as described in VE170.304.d – 1.01 and VE170.304.d – 1.02.

IN170.304.d – 1.02: Tester shall verify that the patient confidential communications preferences are included in the patient reminder list

TEST DATA

This Test Procedure requires the vendor to supply the test data. The Tester shall address the following:

- Vendor-supplied test data shall ensure that the functional and interoperable requirements identified in the criterion can be adequately evaluated for conformance
- Vendor-supplied test data shall strictly focus on meeting the basic capabilities required of an EHR relative to the certification criterion rather than exercising the full breadth/depth of capability that an installed EHR might be expected to support
- Tester shall record as part of the test documentation the specific Vendor-supplied test data that was utilized for testing

CONFORMANCE TEST TOOLS

None

Document History

Version Number	Description of Change	Date Published
0.7	Original draft version	March 22, 2010
1.0	Updated to reflect Final Rule	July 21, 2010
1.0	Updated to remove “Pending” from header	August 13, 2010