

National Council Submits Comments on Proposed Certification Criteria for Behavioral Health Electronic Health Records

In November 2009, the Certification Commission for Health Information Technology (CCHIT) released a draft of its proposed certification criteria for behavioral health electronic health records (EHRs). CCHIT developed two sets of criteria for behavioral health services: one set for the needs of behavioral health as an add-on to a physician's office, and one as a stand-alone certification.

On December 10, 2009, the National Council submitted the following comments to CCHIT:

- 1) We believe that the Stand-alone BH Certification should require functionality to meet all of the requirements of ARRA meaningful use. Our understanding of the proposed process is that it will require two certification steps to demonstrate meaningful use. Once the BH certification is obtained, a vendor will have to certify against the specific modules to fill the gap between the BH certification and the ARRA certification. All other CCHIT certification designations (CCHIT Ambulatory, CCHIT Inpatient, etc.) contain the minimum requirements to demonstrate meaningful use. It breaks precedent to have a CCHIT certification that does not include at least the minimum functionality necessary for meaningful use.
- 2) A necessary component to effectively serving clients in the behavioral health field is the ability to involve families as part of the process. Family members regularly participate in the clinical treatment process, which requires the capacity to track these relationships and document their involvement. This functionality is unique to behavioral health and does not appear to be represented in the set of requirements published for the CCHIT BH certification process.
- 3) BH.151 (to be implemented in 2011): *"The system shall provide the ability to configure signature requirements based on document type and provider."* – This requirement is not clearly defined. We would like to see more specific examples provided to clarify the requirement.
- 4) BH.155 (to be implemented in 2011): *"The system shall provide the ability to store and display data from PHR."* – This requirement should specifically spell out what CCHIT considers a PHR, as well as define what data from a PHR should be viewable from within the EHR system.
- 5) BH.078 (to be implemented in 2011): *"The EHR system shall have the ability to link completion of individual Treatment Plan components to a corresponding task in a provider's task list."* – This requirement is not clearly defined. We would like to see more specific examples provided to clarify the requirement.

- 6) BH.137 (to be implemented in 2011): *“The system shall be able to export individual client reports, such as Care Record Summaries.”* – What is the definition of a Care Record Summary? The specific contents should be defined to allow for vendors who do not use the same terminology in their products.

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