



Framework for Meaningful Use

By Bruce Eckert

As of the date of this writing, the HIT Policy Committee's definition of *meaningful use* seems to be well set. July 16's draft definition has remained unchanged through the August, September and October meetings, and David Blumenthal, the National Coordinator for Health Information Technology, has endorsed this draft. While not yet finalized via the federal rule-making process, the draft gives us, as an industry, a working definition from which we can develop specific action plans (while keeping an eye, of course, on the federal rule-making process for last-minute surprise changes!)

Provider organizations should study the current version and, as soon as possible, perform thorough and objective gap analyses, comparing current capabilities against the draft meaningful use definition. Based on our broad industry knowledge and perspective on gap analyses, Beacon Partners recommends heavily focusing on the year 2011 (or year 1) definition. Year 1 is the gateway to the incentives; without achieving year 1, year 3 and year 5 are irrelevant. Each gap analysis should be conducted conservatively. As healthcare management consultants cognizant of the federal rulings and their affects on the healthcare community, we understand how costly an error it would be for an organization to assume that *almost compliant* is close enough.

Do not overlook information privacy and security. The HIPAA Privacy and Security regulations are now a part of the meaningful use definition, along with the Nationwide Privacy and Security Framework – an additional, albeit similar, set of requirements. And HIPAA regulations are further strengthened by another portion of ARRA, the HITECH Act. Clearly, providers need to ensure that their privacy and security policies and procedures are up-to-date, compliant and consistently followed. We advise that as soon as possible providers conduct privacy and security audits and risk assessments, followed

closely by action plans to resolve areas of deficiency. For provider organizations that are not yet having annual privacy and security audits conducted, the time has come to institute this practice.

At this point we do not know how providers will demonstrate that they have met meaningful use. However, the draft definition of meaningful use includes a significant number of measures related to many of the meaningful use objectives. Since July 16, both the HIT Policy and the HIT Standards Committees' agendas have focused on refining measures, including more specific definitions of data elements and tying meaningful use measurements to NQF quality measures. These activities, and the committees' commentary on these measures, not only shed additional light on meaningful use, but also suggest that provider organizations will need robust reporting capabilities in order to demonstrate compliance. We recommend that providers include the defined measures as part of their gap analyses.

The result of the meaningful use gap analysis will be a list of deficiencies that need to be resolved in order to achieve meaningful use. For many gaps more than one method of resolution may be available. This is the point where it can be helpful to look ahead to the meaningful use 2013 Objectives and Measures. Providers should, while addressing their 2011 gaps, also enable their organizations to meet the 2013 standard. In this light, the fastest and lowest cost solutions may not be the best long-term choices.

In many cases the resulting meaningful use compliance plan will consist of multiple, simultaneous projects of varying scopes, but all with drop-dead completion dates. Beacon Partners feels that effective project management will be critical for providers to meet the meaningful use standard in the necessary timeframes. Oversight and governance of meaningful use compliance should be established at a high level in the organization.

The overall project manager should provide frequent status reports to the oversight and governance body so that barriers and conflicts can be resolved quickly. This is not a time to skimp on

proper project planning. Meaningful use projects are likely to compete with each other for key staff members and available capital, and priorities must be firmly set.

Beacon Partners Regional Manager Bruce Eckert, MBA, CPHIMS, is an information systems executive with 22 years of health care information technology management and consulting experience. Beacon Partners coaches organizations in the Healthcare Community on the development of strategies that maximize Enterprise Yield™, the alignment of people, processes and technologies. Beacon Partners has offices in Boston, San Francisco and Toronto and is one of the fastest growing privately-held healthcare management consulting firms.

As the HITECH portion of the American Recovery and Reinvestment Act (ARRA) of 2009 becomes a priority to healthcare organizations, Beacon Partners' ARRA expertise helps organizations develop a roadmap that will lead to meaningful user status and maximize available incentives.

Please visit <http://www.beaconpartners.com> and Beacon Partners' special healthcare informational portal, <http://www.spotlightonhealthcare.com>.

1.800.4BEACON | www.beaconpartners.com
BOSTON • SAN FRANCISCO • TORONTO