

Test Procedure for §170.304 (g) Timely Access

This document describes the test procedure for evaluating conformance of complete EHRs or EHR modules¹ 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 document² 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 (g) Timely access. Enable a user to provide patients with online access to their clinical information, including, at a minimum, lab test results, problem list, medication list, and 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.

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 timely access certification criterion is discussed:

- “The purpose and intent of this certification criterion and its associated meaningful use objective and measure (as clarified in the Medicare and Medicaid EHR Incentive Programs final rule) is to ensure that patients have the ability to access their health information when they see fit to do so.”
- “Meaningful Use Stage 1 Measure: More than 10% of all unique patients seen by the EP are provided timely (available to the patient within four business days of being updated in the certified EHR technology) electronic access to their health information subject to the EP’s discretion to withhold certain information.”

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 enable a user to provide patients with online access to their clinical information, including lab test results, problem list, medication list, and medication allergy list. Online access is evaluated in terms of the capability for the patient to access their health information online and either display or print the required clinical information. Other forms of online access are not evaluated in this test.

The Vendor supplies the test data for this test procedure.

This test procedure consists of one section:

- Provide Patient Online Access – evaluates the capability to provide patients with online access to their clinical information, including lab test results, problem list, medication list, and medication allergy list
 - The Tester provides a patient with online access to their clinical information, including lab test results, problem list, medication list, and medication allergy list
 - The Tester verifies that the patient accesses their clinical information, including lab test results, problem list, medication list, and medication allergy list

REFERENCED STANDARDS

None

NORMATIVE TEST PROCEDURES

Derived Test Requirements

DTR170.304.g – 1: Provide Patients Online Access

DTR170.304.g – 1: Provide Patients Online Access

Required Vendor Information

- VE170.304.g – 1.01: Vendor shall identify a patient with an existing record in the EHR to be used for this test, which contains lab test results, problem list, medication list, and medication allergy list
- VE170.304.g – 1.02: Vendor shall identify the EHR function(s) that are available to: 1) select the patient, 2) enable patients to access online their clinical information, including lab test results, problem list, medication list, and medication allergy list, 3) display or print (by patient) patient clinical information including lab test results, problem list, medication list, and medication allergy list

Required Test Procedure:

- TE170.304.g – 1.01: Using the EHR function(s) identified by the Vendor, the Tester shall enable online access by the patient to their clinical information, including lab test results, problem list, medication list, and medication allergy list
- TE 170.304.g –1.02: Using the EHR function(s) identified by the Vendor, the Tester, acting in the role of the patient, shall display or print the patient's clinical information including lab test results, problem list, medication list, and medication allergy list
- TE170.304.g– 1.03: Using the NIST-supplied Inspection Test Guide, the Tester shall verify that the patient accesses their clinical information, including lab test results, problem list, medication list, and medication allergy list

Inspection Test Guide

- IN170.304.g – 1.01: Tester shall verify that the patient accessed their clinical information and that the data were displayed or printed, including
- lab test results
 - problem list
 - medication list
 - medication allergy 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	Date Published
0.4	Original draft version	March 19, 2010
1.0	Updated to reflect Final Rule	July 21, 2010
1.0	Updated to remove “Pending” from header	August 13, 2010
1.1	Removed “draft” from introductory paragraph	September 24, 2010