“To Verify”
An Opportunity for Compliance Assurance and Oversight in EHR-Sourced Records

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Introduction

- ISO/HL7 10781 - Electronic Health Record System Functional Model, Release 2
- Normative Standard for both HL7 and ISO
- aka FM R2 or R2

R2’s Record Infrastructure (RI) Section utilizes “Lifecycle Events” from ISO 21089 (now in revision)

Forward path is uncertain, “soft”, and in flux
RI.1.1  24 + 3 Lifecycle Events

<table>
<thead>
<tr>
<th>Originate and Retain  RI.1.1.1</th>
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<td>Receive and Retain RI.1.1.8</td>
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<td>Amend RI.1.1.2</td>
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<td><strong>Verify</strong> (Added Lifecycle Event #25)</td>
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<td>Translate RI.1.1.3</td>
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<td>Pseudo-mynize RI.1.1.11</td>
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<td>Re-Identify RI.1.1.12</td>
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<td>Extract RI.1.1.13</td>
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| Archive RI.1.1.14           |
| Restore RI.1.1.15           |
| Destroy or Identify Record Entries as Missing RI.1.1.16 |
| Re-Activate RI.1.1.18       |
| Merge RI.1.1.19 Function    |
| Unmerge RI.1.1.20           |
| Link RI.1.1.21              |
| Unlink RI.1.1.22            |
| Legal Hold RI.1.1.23        |
| Legal Hold Release RI.1.1.24 |
| Encrypt (New)               |
| Decrypt (New)               |

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Overview

“**To Verify**”: Now available as a linchpin and critical opportunity for Record Authenticity and derivatives (Compliance and Program Integrity, Oversight)

- Upcoming ONC Workshop
- Identifying stakeholders
Action Options: Post Workshop

- HL7 gearing up-If/How to engage
- Stakeholder engagement required
  - Advancing ONC S&I Initiative for Lab Results (LRI) which created standing for “To Verify”
  - FHIR Initiative with “Verify” infrastructure
- Possible topic for RMES Profile R2
- Other entities, other areas of interest?
“To Verify”

“To evaluate the compliance of data objects with regulations, requirements, specifications, or other internally imposed conditions based on organizational policy. Contrast with validate.”
“To Verify”

- Could be automated
- Could start with a very small, minor requirement
- Could initially be voluntary (or optional with benefit(s))
- Could become increasingly complex over time

- **Capability currently in progress (in nascent form) in upcoming version of FHIR* specification included in recent ballot.**

- But…

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*FHIR: Fast Healthcare Interoperability Resources
“To Verify”

Needs…
- Advocates/End-users
- Use Case(s)
- Home Health, DME as CMS interest areas

Launch opportunity
ONC Workshop: Using the Lab Results Interface (LRI) Implementation Guide as a “demonstration of current capacities”
Signal vendors: Building better EHRs as best option
EHRs Capturing Real World Acts or Events into Record Entries (REs) via Record Lifecycle Events (LCEs)

- "Real World"
  - Acts and Events
  - [Launch Encounter Record Entry]
    - [Originate Record]
      - [Potential Record Entry]
        - [Retain Record]
          - [Retained (Created) Record Entry]

- Local System
  - (Existing Data Object/Record)
    - [Receive Record]

- Non-Local System
  - [Record Entry State]
    - [Record Entry Transition (or LCE)]

Legend:
- Record Entry State
- Record Entry Transition (or LCE)
“To Verify” in Context of “Export”
Future: “To Validate” for “Export”
Summary

- Lab Results Implementation Guide established the “existence” of LCE “To Verify” as an operational requirement for Received Records (labs)
- FHIR is incorporating “To Verify” as an implementable function referencing End-User specific “Record Specifications” as a Resource Type.
- End Users of EHR-sourced Records can establish “Record Specifications”
“Specification” Potential Examples

Machine-readable specifications to be verified

1. **Elementary**: Yes vs. No: “Clinician (or org) has attested to compliance with applicable documentation guidelines as indicated at (end-user website here…)

2. **Basic**: EHR verifies that this Record Entry Origination event does (or does not) incorporate Record Specification (XYZ) for (End-Use ABC)

3. **Minimal**: EHR verifies that this Record Entry Origination event does/does not capture and attribute all authors per Record Specification (DEF)
Discussion, Questions

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