



**Electronic
Healthcare Network
Accreditation
Commission**

www.EHNAC.org

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September 10, 2015

To: Office of the National Coordinator

Subject: Submission of Non-Governmental Developed Test Procedures, Test Tools, and Test Data for Use Under the ONC Health IT Certification Program

We are responding regarding the Permanent Health IT Certification Program as mentioned in your June 9th document published in the Federal Register as EHNAC believes that the process for self-assessment and follow up site visits should be made part of the Permanent Health IT Certification Program.

For over 20 years, the Electronic Healthcare Network Accreditation Commission (EHNAC) has provided accreditation programs for a variety of stakeholders in the health care industry. EHNAC is an independent, federally recognized, standards development organization (SDO) and tax-exempt, 501(c)(6) non-profit accrediting body designed to improve transactional quality, operational efficiency and data security in health care. EHNAC is the premier accreditation authority promoting standards that support interoperability, stakeholder trust, regulatory compliance, quality service, innovation, and open competition within the healthcare industry.

EHNAC believes that the process and procedures we have developed for our accreditation programs over the past 20 years can be effectively used as a model by ONC in its Health IT Certification Program. As an example, in 2013 we partnered with DirectTrust to develop the Direct Trust Agent Accreditation Program (DTAAP) which we jointly launched to accredit HISP's, CA's and RA's and the industry adoption has been very successful. We have recently developed and launched an accreditation program for practice management systems (PMSAP), which mirrors many of the requirements of the ONC Health IT Certification program.

The EHNAC Process for Development and Approval of Criteria

EHNAC uses a highly structured transparent process to develop and implement its programs. The development of criteria is accomplished by industry experts and vetted through a public comment process, which duplicates that of other SDOs. The exact process of criteria development is detailed on our website on the [Criteria Page](#). Once approved, the criteria are published on the EHNAC website for the public to review and download. Organizations can then apply for accreditation against those guidelines.

The EHNAC Accreditation Process

The accreditation process consists of both a self-assessment against the criteria and an on-site review/audit to verify and validate the results of the self-assessment. Organizations have up to one year to complete the entire accreditation process. The specific steps involved are:

1. Complete the [pre-application form](#) on the EHNAC Web site. A clarification letter is emailed to the organization. Complete an electronic detailed application for each program applied. Upload to EHNAC portal or fax the signed Applicant Agreement and Sentinel Events documents and revenue verification, and mail the application fee to EHNAC.
2. Pay application fees [Annual fee & site visit fee(s)].
3. Upon acceptance of the completed application(s), the EHNAC Self-



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Assessment zip file including the instructional guidance and examples of evidentiary documentation are made available to the organization which must be submitted to the EHNAC secure portal 4 months prior to the expiration date.

4. The guidelines and all other documentation are available on the EHNAC web site for further review.
5. If the Self-Assessment Report contains sufficient satisfactory information and documentation to support the candidate's application, a site visit will be scheduled to verify the information contained in the report. If the Commission or the assigned site reviewer has questions, it may return the Self-Assessment Report for further information before a date is set for the site review.
6. Submit the site visit expense fee.
7. The Commission reviews, comments and votes on the Self-Assessment.
8. The organization will be informed whether the accreditation has been approved or denied.

Benefits of the accreditation process are: assurance that the organization meets criteria (both regulatory and best practice and resources); the opportunity for the organization to thoroughly review and document its processes for, privacy, security, confidentiality and cybersecurity including PHI workflow; and consultative assistance and recommendations for organizations who may fail to meet some of the necessary criteria.

In summary EHNAC believes that the process for self-assessment and follow-up site visits should be made part of the Permanent Health IT Certification Program as mentioned in your June 9th document published in the Federal Register. We would be pleased to discuss this further with you. Please contact me to discuss further.

Sincerely,

Lee Barrett, EHNAC Executive Director
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860.408.1620

Cc: EHNAC Commission