

THE TIMELINE FOR ARRA PROVISIONS

The American Recovery and Reinvestment Act includes numerous deadlines and milestones for technology. I thought it would be useful to provide a timeline for the work ahead:

Upon enactment (February 16, 2009)

*Additional funding to government agencies to enhance adoption of healthcare information exchange (Section 3011)

* Research and development programs (Centers for Health Care Information Exchange Integration). Grants will be awarded on a merit-reviewed, competitive basis. The purposes of the Centers include generating innovative approaches to technology integration through cutting-edge, multidisciplinary research, and HIT development. Eligible research areas include:

-Interfaces between human information and communications systems

-Voice recognition systems

-Software that improves interoperability and connectivity among health information systems

-Software dependability of systems critical to health care delivery

-Measurement of technologies on the quality and productivity of health care

-Health information enterprise management

-Health information security and integrity

-Technology to reduce medical errors (Section 13202)

Within 45 days of enactment (April 3, 2009)

*Appointment of HIT Policy Committee members - Section 3002(b)

After 45 days from date of enactment (April 3, 2009), but prior to 90 days (May 18, 2009):

*HIT Policy Committee makes recommendations to ONC on areas in which standards, implementation specifications, and certification criteria are needed included those to protect privacy, ensure security, account for disclosures, encrypt information and use EHRs for quality improvement (Section 3002)

Within 90 days of enactment (May 18, 2009)

*HIT Standards Committee will develop a schedule for assessment of the policy recommendations developed by the HIT Policy Committee (Section 3003)

*NIST to conduct pilot testing of standards and implementation (Section 3003 and Section 13201)

*Draft description of program for establishing regional centers for HIT Implementation Assistance (Section 3012)

Not later than 45 days after the HIT Standards Committee delivers recommendations to ONC

*ONC makes a determination whether to endorse each standard, implementation specification, and certification criterion for the electronic exchange and use of health information that is recommended by the HIT Standards Committee and delivers recommendations to HHS Secretary (Section 3001)

By December 31, 2009

*The HHS Secretary (in consultation with other Federal Agencies) will determine what standards should be adopted from those endorsed by ONC, and adopt them through rulemaking processes (Section 3004)

*The Secretary will adopt an initial set of standards, implementation specifications and certification criteria through release of Interim Final Regulations (Section 3004)

After January 1, 2010

*Grants to standards and Indian tribes (for development of loan programs to facilitate adoption of certified EHR technology) (Section 3014)

By October 1, 2010

*Study and report to Congress on current availability of open source HIT systems to federal safety net providers and recommendations for legislative or administrative action (Section 4014)

After October 1, 2010

*State grants to promote HIT (implementation grants to facilitate and expand health information exchange, including required matches) (Section 3013)

Effective January 1, 2011

*Accounting of disclosures for EHRs acquired after January 1, 2009 (Section 13405)

Effective January 1, 2014

*Account of disclosures for EHRs acquired before January 1, 2009 (This is a grandfather clause which assumes older EHRs may not have audit trail functionality and gives vendors extra time to retrofit them) (Section 13405)

This is an audacious schedule and the folks at ONC are working 24x7 to meet the 2009 deadlines. Today is the deadline for nominations to the HIT Policy and Standards Committees. I've been nominated by ANSI for the Standards Committee.