The road to meaningful use has many moving parts that make this initiative complex. Here on Everything Rad, we’ve spent a lot of time discussing the current state of legislation and regulations, as well as the implications of MU for radiologists in terms of compliance and incentives and penalties. Today we’ll look closer at IT product certification—more specifically RIS certification.

**Product Certification Process**

First it’s important to understand that Health and Human Services oversees two federal agencies set up to manage meaningful use: CMS regulates the providers; ONC regulates the technology.

There is a set of federal regulations with 33 ONC vendor criteria for complete EHR certification and 25 CMS measures that are specific to radiology. Vendors submit their health IT systems for testing and certification by an authorized testing agency (set up by the ONC). Eligible professionals purchase certified technology and then submit an attestation to the CMS that they are using the certified technology in a meaningful way. In year 1, the attestation is simply a signed document. In future years, they will have to submit data to the CMS electronically.
Finally, eligible professionals receive their lump sum payment!

**Understanding RIS Certification**

When planning your meaningful use technological and operational strategy, it’s important to meet with your radiology IT vendor to discuss their certification plans.

Vendors can choose to opt for either complete EHR certification or modular certification:

- **Complete EHR certification** – adheres to all 33 ONC criteria, which includes 25 functional criteria and 8 privacy and security criteria
- **Modular certification** - product can meet any single or multiple criteria. You can combine modular certified products to achieve meaningful use.

If you use modular certified products you need to be certain they cover your MU measure requirements. In addition, ONC regulations state that you need to “possess” all certification criteria, even if you don’t use them for your MU measures—even if they are not all deployed.

**Implementing Modular RIS**

I speak with many customers about how to determine if a modularly certified RIS or complete EHR/EMR is necessary for their facility’s meaningful use compliance. From a radiology standpoint, there are a few things to consider when making your purchasing decision:

- Will your certified EMR / EHR system address the unique workflow and data needs of radiology?
- Are there existing technologies and systems that could be used together for attestation?
- Could a modular RIS send structured data to a certified EMR to support an organization’s broader plan?
In addition, a standalone RIS could play an important role in areas where meaningful use may expand for radiology:

- Order Entry decision support – decision support to make sure exams ordered match patient conditions
- Exam protocoling – Radiologists may begin protocoling exams more frequently using established protocols for patient conditions
- Quality Outcomes – More established guidelines around capturing, maintaining, and reporting radiation dose and exposure
- Structured Reporting – Radiology reports will move from paragraph style reporting to standardized structured reports

This week Carestream’s Vue RIS received ONC-ATCB 2011/2012 certification as an EMR module that meets the first stage of U.S. meaningful use initiatives. Why’d we choose to certify as a module? We wanted to offer our customers a flexible system that captures MU data at the right time in the workflow and shares that information with other health IT and HER systems, as well as offer a RIS that could adapt as meaningful use standards and criteria change, which they are sure to do into the distant future.

Discussions like these are crucial to be having with your health IT and radiology IT vendors as you prepare your meaningful use strategy.

Looking to evaluate MU certified products from multiple vendors? Visit the Certified Health IT Product List to see how systems stack up against the 33 criteria and 25 MU measures: http://onc-chpl.force.com/ehrcert.

References
1. Posts by Carestream Health (blog.carestreamhealth.com)
2. ONC-ATCB 2011/2012 certification (carestream.com)