CompTIA

WHITE PAPER

Health IT Deployment: The Essential Role of Small IT Solution Providers

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EXECUTIVE SUMMARY

The health IT transition is a vital step toward improving the quality of care and overall health of patients throughout the United States. Several key legislative efforts have established policies seeking to advance the transition among medical providers. Trends, however, indicate that small medical providers are slow to adopt health IT due to a range of concerns about their ability to navigate complex technologies and the impacts it could have on their practices.

At the same time, small IT solution providers have the expertise to be a meaningful partner in the transition, but current policies have restricted their ability to enter the health IT market on a large scale. Several minor changes to existing policy would make great strides towards bringing small IT solution providers into the fold to help advance the transition and remove some of the burden from small medical providers. This paper outlines recommendations within three distinct policy areas: education, technical assistance, and privacy and security.

Health IT has the ability to increase the quality of care to patients and usher in significant economic benefits for small businesses across the nation. However, for health IT to be a success, federal policies must understand the important link between small medical providers and small IT solution providers. Policies that foster a partnership between these small businesses will not only allow medical providers to focus on patients, but will also help to grow the economy and keep the U.S. IT industry competitive within a $3 trillion global IT market.

PART 1: HEALTH IT AND SMALL BUSINESS

Health information technology (IT) deployment is a vital national priority that has the capability to increase the quality and efficiency of healthcare in the United States, while reducing the overall long-term costs associated with antiquated record keeping and other applications. From eliminating the need for duplicative medical tests to providing healthcare professionals with instant access to patient information, health IT is a key component of modernizing our healthcare systems.

Health IT also has the ability to transform our nation's evolving economy. As Secretary Sebelius noted, "we believe in health information technology because it's an investment in a stronger economy."[1] Two studies, one by the RAND Corporation and one by the Center for Information Technology Leadership, report estimates of the potential net benefits that could arise nationwide if all providers and hospitals adopted health information technology. Both studies estimated annual net savings to the health care sector of about $80 billion, relative to total spending for health care of about $2 trillion per year.[2]

In order to achieve the dual benefits of healthcare optimization and economic growth, health IT should be implemented in a manner that allows medical providers to continue to focus on patient care and not be distracted with complex and expensive new requirements. The IT industry should be a partner in this process in order to provide a seamless health IT transition, while removing the burden from medical providers. This partnership will not only allow for more widespread adoption of health IT among small medical providers, but will also allow healthcare providers to continue their focus on patients and avoid dedicating staff to new information technology systems.

As part of a $3 trillion global industry, IT sector employment in the U.S. could benefit from healthcare growth in the form of a higher volume of work and in newly created positions. According to the Bureau of Labor Statistics, employment of medical records and health information technicians is expected to increase by 20 percent, much faster than the average for all occupations through 2018.

Great benefits exist for both our healthcare and the economy by effectively integrating the IT community into the health IT transition.

Wider adoption of health IT has the potential to generate both internal and external savings:

- Internal savings are those that can be captured by the provider or hospital that purchases the system; they are most likely to be in the form of reductions in the cost of providing health care—that is, improvements in the efficiency with which providers and hospitals deliver care.

- External savings are those that the provider or hospital that purchases the system cannot realize but that accrue to another such provider or perhaps the relevant health insurance plan or even the patient. Such savings might arise, for example, from the newfound ability of participants in the health care sector to exchange information more efficiently.

Source: Congressional Budget Office, Evidence on the Costs and Benefits of Health Information Technology

ABOUT CompTIA

The Computing Technology Industry Association (CompTIA) is a non-profit trade association representing the IT industry. CompTIA represents over 2,000 IT companies. Our members are at the forefront of innovation and provide a critical backbone that supports broader commerce and job creation. These members include computer hardware manufacturers, software developers, technology distributors, and IT specialists that help organizations integrate and use technology products and services. CompTIA is dedicated to serving its membership by advancing industry innovation and growth through its educational programs, market research, networking events, and public policy advocacy.

1 Secretary Sebelius Remarks, HIMSS Convention, February 23, 2011.
2 Congressional Budget Office, Evidence on the Costs and Benefits of Health Information Technology: www.cbo.gov/ftpdocs/91xx/doc9168/05-20-HealthIT.pdf.

CompTIA is also the leading global provider of vendor neutral IT certifications to validate skills in the workplace. Over 1.5 million individuals hold one of our certifications, with the vast majority having completed one of our foundational certifications, A+, Security+, and Network+. The development and dissemination of these certifications serve the industry by adding to the level of knowledge and professionalization of the IT solution provider. In turn, this allows the IT solution provider to be an ambassador for the IT industry, bringing to its client a voice of technical knowledge and support.

CompTIA offers its members and the industry at large numerous training and credential programs to help them enter the health IT market, among other IT verticals. The CompTIA Healthcare IT Technician certificate covers the knowledge and skills required to implement, deploy, and support health IT systems in various clinical settings. The exam covers regulatory requirements, organizational behavior, IT operations, medical business operations and security. The exam is intended for IT professionals who are CompTIA A+ certified or have 500 hours of hands-on IT technical experience in the lab or field, plus the knowledge/skills necessary to deploy and support health IT systems. On the business side, CompTIA offers a suite of training courses and educational tools to help IT companies maintain best practices when developing and implementing IT solutions for healthcare offices and hospitals.

PART 2: POLICY AND REGULATORY LANDSCAPE

The HITECH Act and the Strategic Plan

The Health Information Technology for Economic and Clinical Health (HITECH) Act was signed into law as part of the American Recovery and Reinvestment Act in 2009. The legislation makes significant progress in providing incentives for early adoption of Electronic Health Records (EHRs) through incentive payments for achieving the "meaningful use of electronic health records" standard, which are later replaced by penalties for noncompliance. Achieving the "meaningful use" standard adds an additional layer of concern for medical providers as the path to reaching "meaningful use" remains unclear to many small medical providers. The legislation also codifies the Office of National Coordinator for Health Information Technology (ONCHIT), expands the requirements of the Health Insurance Portability and Accountability Act (HIPAA), and provides several funding opportunities to assist in the transition.

What is "Meaningful Use"?

The American Recovery and Reinvestment Act of 2009 specifies three main components of Meaningful Use:

1. The use of a certified EHR in a meaningful manner, such as e-prescribing.
2. The use of certified EHR technology for electronic exchange of health information to improve quality of health care.
3. The use of certified EHR technology to submit clinical quality and other measures.

According to the Centers for Medicare & Medicaid Services, "meaningful use" means providers need to show they're using certified EHR technology in ways that can be measured significantly in quality and in quantity.

Recently, the Office of National Coordinator (ONC) released the "Federal Healthcare IT Strategic Plan: 2011-2015," which outlined five general goals:

- Achieve adoption and information exchange through meaningful use of healthcare IT.
- Improve care, improve population health, and reduce healthcare costs through use of healthcare IT.
- Inspire confidence and trust in healthcare IT.
- Empower individuals with healthcare IT to improve their health and the healthcare system.
- Achieve rapid learning and technological advancement.

Thus far, the federal government has taken significant steps towards achieving these goals; however participation by small and medium sized medical providers has not achieved full potential. In order to realize better health outcomes, a more efficient delivery of medical services, and a satisfied patient base, it is important that more small medical providers participate and that IT solution providers be made a partner in achieving these goals.

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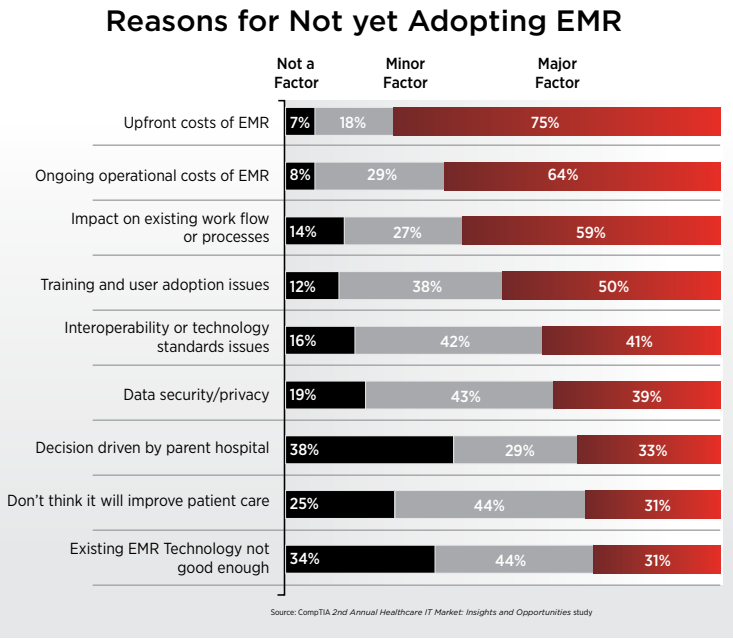
Small Medical Providers

Early trends indicate that small medical practices are less likely to transition to electronic medical records, despite incentives provided within the HITECH Act. According to the Office of National Coordinator, only 41% of small medical providers will be compliant with digital health record records by 2014. In many cases, small medical providers are concerned about the lack of staff resources they have to dedicate to a health IT system. According to Farzad Mastashari, National Coordinator, small medical providers "often lack staff with IT training and don't have the background or the time to do it themselves."[3]

There continues to be a concern that implementing health IT in small practices will become the responsibility of medical staff and, ultimately, take them away from their primary focus. At a recent Congressional hearing, a small medical provider highlighted this concern by stating, "I fear the effect it may have on my practice in terms of the disruption of care that I can provide to my patients during the procurement of hardware and software, converting patient records, learning and implementing the system as a practitioner, and training staff. And while I certainly understand that an EMR system would benefit patients, will it require more—or less—physician and staff time, and will it ultimately be beneficial to my practice?"[4]



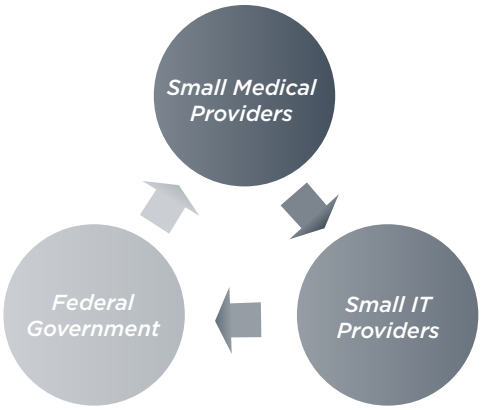
3 Farzad Mastashari, Testimony before the House Small Business Subcommittee on Healthcare and Technology, June 2, 2011.
4 Denise Lea Elliott, Testimony before the House Small Business Subcommittee on Healthcare and Technology, June 2, 2011.

While the HITECH Act is an important framework for advancing health IT, the legislation does not promote the significant role the IT community, particularly IT solution providers, should play in the transition to electronic medical records, especially for small medical providers. As HHS Secretary Sebelius noted in a recent speech, "switching from paper to electronic records is never easy. But it is a lot harder for the small practice with limited staff and resources than it is for the major hospital with a trained IT team and a big budget for capital improvements."[5]

The IT industry has the ability to help fill the health IT void among small medical providers and reverse the current trend away from implementation. However, small IT providers have significant barriers to participating in the health IT transition.

Role of IT Community, Barriers

Current estimates are that the Unites States will need 50,000 more health IT workers to help medical providers achieve meaningful use of electronic medical records.[6] Yet, the IT industry has a long track record of growth and is uniquely positioned to fill this void—particularly among small and medium-sized IT firms. According to a 2010 Small Business Administration report, small firms accounted for 65% (or 9.8 million) of the 15 million net new jobs created between 1993 and 2009. Furthermore, small businesses hire 40 percent of high tech workers (such as scientists, engineers, and computer programmers).[7]



While the IT solution provider could play a significant role helping small medical providers overcome the challenges of implementing health IT, a variety of barriers exist that have prevented IT solution providers from entering the market in meaningful numbers. In general, the HITECH Act and the strategy presented by the ONC both have a significant focus on the medical provider, yet do not mention the role IT solution providers could play in a successful transition. Therefore, the entire burden has been placed on the medical providers themselves, without a focus on partnering with IT solution providers.

There are also specific barriers preventing small and medium sized IT businesses from helping achieve the healthcare and economic potential, such as:

- A lack of resources for retraining IT professionals,
- Fully integrating IT professionals in the assistance provided by the Regional Extension Centers, and,
- Data breach provisions that place unfair burdens on IT professionals.

While these barriers could significantly limit entry for IT professionals and, therefore, limit the success of the health IT transition for small medical providers, there are opportunities to overcome these barriers. We explore each of these areas below.

5 Secretary Sebelius Remarks, HIMSS Convention, February 23, 2011.
6 EHR Institute: www.ehrinstitute.org/ehrhow/group-blog.blog/2010/09/08/Additional-50-000-Health-IT-Workers-Needed-to-Impl.
7 Small Business Administration, Frequently Asked Questions: web.sba.gov/faqs/faqIndexAll.cfm?areaid=24.

PART 3: EDUCATION

POLICY RECOMMENDATION

> Provide support and resources toward retraining current IT professionals in health IT specialties.

CURRENT SITUATION

The current economic slowdown is having a profound effect on the labor market as workers shift to adapt to new realities. As Secretary of Labor Hilda Solis noted, "As the economy recovers, the labor market will continue to evolve. To remain competitive, we need to ensure that industry has the labor it needs to innovate and expand, and that displaced workers have the skills to compete for these new jobs." Health care-sector jobs have continued to grow throughout this recession, and this growth is expected to continue as the American population ages.[8]

The Bureau of Labor Statistics estimates that medical records and health information technicians held about 172,500 jobs in 2008. Jobs are expected to grow by 20%, or about 35,100 new jobs, for the decade 2008-2018. The Office of National Coordinator estimates that 50,000 IT workers will be needed to meet the EHR requirements of "meaningful use." To meet this need, there has been a significant focus on recruitment of new individuals trained in health IT at the college and university level through scholarships and grants made available by the American Recovery and Reinvestment Act. CompTIA very much supports this focus as demonstrated by our deep commitment to, and active participation with, the Midwest HIT Regional College Consortium and to the HHS/DOL Career Clusters effort. However, from our experience, more attention and resources need to be provided to training existing IT professionals who already have basic IT skills but who need additional help in adding a health IT "bolt-on" to their considerable knowledge and experience in IT. Many of these professionals will go through private training centers and/or will audit courses at their local community college or university, and then take a certification test to validate those skills allowing them to more rapidly become conversant in health IT. This summer, CompTIA launched its own healthcare IT technician certificate, a vendor- and technology-neutral credential that validates the operational, regulatory and security knowledge necessary to provide hardware and software support in medical environments where EHR systems are used.

OCCUPATIONAL PROJECTIONS DATA:
MEDICAL RECORDS AND HEALTH INFORMATION TECHNICIANS

Employment		Employment Change (2008-19)		Job openings due to growth and replacement needs
2008	2018	NUMBER	PERCENT	2008-2018
172,500	207,600	35,100	20.3	70,300

Source: U.S. Bureau of Labor Statistics

Typical coursework in health information technology includes medical terminology, anatomy and physiology, health data requirements and standards, clinical classification and coding systems, data analysis, healthcare reimbursement methods, database security and management, and quality improvement methods.[9] While bringing new people into the profession is important, the existing IT community must not be forgotten and, indeed, should be leveraged more effectively as we work to

8 Politico: www.politico.com/news/stories/0710/40195.html.
9 U.S. Bureau of Labor Statistics: www.bls.gov/oco/ocos103.htm.

draw current IT professionals into new careers. These men and women can be activated very rapidly to help with the transition toward health IT, but they need some economic assistance to offset some of the costs of this sizeable investment.

SOLUTION PROVIDER HIT TRAINING NEEDS

HIT Training Needs	Very Critical Need	Somewhat Critical Need	Not Critical
Compliance/regulatory mandates (HIPAA)	45%	36%	20%
Healthcare workflow processes	42%	43%	15%
Software applications such as EMR	41%	40%	18%
How to access federal stimulus funds	39%	45%	17%
Business strategies for entering a new market	37%	47%	16%
Sales training	31%	47%	22%

Source: CompTIA's 2nd Annual Healthcare IT Market: Insights and Opportunities study

OPPORTUNITY

President Barack Obama said that "one thing government can do is partner with the private sector to make sure that every worker has the necessary skills for the jobs they're applying for."[10] Policies such as an HIT education tax credit or direct lending to offset education and other costs would provide valuable resources to allow workers with IT knowledge to shift their focus to the growing health IT sector, allowing tens of thousands of IT workers to take advantage of the national push for the benefits surrounding EMRs.

However, we understand the fiscal pressures that are having a profound impact across federal budgets and initiatives. Because of that, we recommend adapting existing tax credit programs to help retrain current IT professionals and then phase credits out over time. In particular, we encourage policymakers to amend the Lifetime Learning Credit and Business Education Tax Deduction so that individuals and IT solution providers could offset some of the expense of earning appropriate certifications and skills for the HIT marketplace. These initiatives can provide the necessary incentive to defray the costs for business owners, while ensuring that the workforce is capable of handling the challenge ahead.

Further, we recommend that capital support for small IT businesses should be provided by re-allocating funds from existing programs designed to assist small businesses, such as the Small Business Lending Fund. While a total of $30 billion has been allocated to the Small Business Lending Fund, at this point, applications for only $12 billion has been received. Accordingly, we recommend undistributed funds be redirected to address these HIT funding needs.

10 Wall Street Journal: online.wsj.com/article SB10001424052702304259304576379142910970126.html.

PART 4: TECHNICAL ASSISTANCE

POLICY RECOMMENDATION

> **Ensure that Regional Extension Centers (RECs) work to educate and integrate small IT firms into the health IT transition.**

CURRENT SITUATION

The Office of National Coordinator has used $677 million to fund 62 Regional Extension Centers throughout the nation. According to the ONC, the goals of the RECs "include outreach and education, EHR support (e.g., working with vendors, helping choose a certified EHR system), and technical assistance in implementing health IT and using it in a meaningful way to improve care."[11]

The RECs have the ability to greatly impact the EHR transition, especially among small medical providers. According to David Blumenthal, the former National Coordinator, "conversion from paper to electronic health records is a challenging task for any provider, and we believe that help from the RECs will make an important difference, especially in assisting doctors in smaller practices and the smaller and rural hospitals."[12] The outreach and technical assistance RECs could provide should not only increase participation, but reduce costs for the providers. In order to best serve medical providers and encourage greater participation, RECs should universally expand their focus to everyone that plays a role in the transition and not limit their focus to medical providers—many of which will outsource their IT work to a third party.

Small IT solution providers can play a significant role in helping small medical providers with the transition to EHRs; however, RECs greatly vary in their approach to small IT firms. In some cases, RECs are doing very little to establish a connection between small IT firms and small medical providers, which leaves small medical providers without a vital component of a successful EHR transition. While most RECs identify themselves as vendor neutral, many have preferred vendor lists that vary significantly in terms of preferred vendors and overall structure.

Additionally, REC websites vary significantly, which reduces their ability to advance their outreach goals. In most cases, they provide little information for IT professionals that could be carrying out the transition and focus entirely on the medical providers, which remain hesitant to move forward.

The absence of a universal commitment by the RECs to integrate small IT firms into the transition will not only impact the ability of small medical providers to participate in the transition, but will also limit their ability to focus on patient care.

11 Office of National Coordinator: healthit.hhs.gov/portal/server.pt/community/facts_at_a_glance/1835/home/17870.
12 David Blumenthal: www.regionalextensioncenters.com.

OPPORTUNITY

CompTIA strongly supports the concept of Regional Extension Centers that will assist in the EHR transition, especially for small medical providers that continue to struggle without clear direction. It is important, however, that the RECs have a uniform process that facilitates communication and outreach to all parties involved in the transition. While some RECs are already effectively doing this, it is important to ensure that RECs across the nation are providing uniform services to best reach the goal of a successful EHR transition.

RECs should have a list of local solution providers that are readily available to medical providers. These lists should be neutral and provide a diverse menu of local options to assist with the EHR transition. RECs should also offer guidance and training to IT solution providers on "meaningful use," data breach, and notification standards. Additionally, the RECs should actively work to partner medical providers with IT solution providers and resist attempting to serve as the IT solution provider themselves. In some cases, RECs are establishing venues (similar to job fairs) that would connect these two vital components of the EHR transition, which is a model that should be used throughout the country.

CompTIA is working to make sure IT companies are well-versed in the specific IT needs of healthcare providers, and has created a suite of training courses and educational tools to that end.

PART 5: PRIVACY AND SECURITY

POLICY RECOMMENDATION

> **Amend the Business Associate Rule.**

> **Enact federal preemption for data breach standards and notification requirements, including elimination of private rights of action.**

CURRENT SITUATION

In general, CompTIA applauds the efforts made under the HITECH Act to raise privacy standards for personal health information (PHI). Consumer and medical trust in health IT will only come to pass if there is strong respect for, and protection and enforcement of, personal health information. With that said, there are a series of notable provisions that will present substantial burden on the small IT solution provider that could severely restrict entry and competition in the HIT space.

Business Associate Rule

Under the HITECH Act, business associates and subcontractors of the covered entities are now directly liable under HIPAA for complying with the security and privacy rules. Originally, the HIPAA Security Rule required a covered entity to maintain administrative, technical, and physical safeguards to ensure the confidentiality, integrity, and availability of all PHI the covered entity

creates, receives, maintains, or transmits. However, the HITECH Act extended the application of the HIPAA Security Rule's provisions on administrative, physical, and technical safeguards and documentation requirements to business associates of covered entities, making those business associates subject to civil and criminal liability for violations of the HIPAA Security Rule.

This change represents a departure from HIPAA where the liability for business associates was based on the applicable business associate contract with the covered entity. This means that a small IT solution provider can now be exposed to criminal penalties and civil fines that can range up to $1.5 million—a crushing amount for a business with 20 employees or less.

State Standards

Today, over 45 states have data breach notification requirement laws on the books with varying requirements and standards. When the HITECH Act was enacted, the new law specifically allowed states to maintain their individual data notification laws, so long as the state laws did not provide less protection than the HIPAA Privacy Rule. Because of this, states were authorized with few limitations under the HITECH Act to create new requirements that impose additional limitations on the use and disclosure of protected health information, including adding new parameters on how data breach notifications must be managed.

This interplay between state and federal standards can be a source of great confusion to a small business in the HIT space. For example, under the HITECH Act a data breach notification must be provided within 60 days of a breach, but in states like Massachusetts, a notice of data breach must be provided within 45 days. Even more complicating, under the business associate rule, the notice requirement is triggered if a vendor knows, or "should have known" that a breach occurred had the vendor undertaken "reasonable diligence." Yet the Massachusetts data breach law requires a vendor to provide notice when it "knows or has reason to know of a breach of security."[13] These variances can cause small IT solution providers millions of dollars in aggregated compliance and legal costs.

Furthermore, because the HITECH Act does not preempt state data breach notification laws that are more stringent, small IT solution providers remain exposed to civil litigation through private rights of action. Currently, over ten states maintain data breach notification laws with private right of action provisions, subjecting small businesses to significant legal exposure and risk. For example, any resident of California can file a civil action under the state's data breach notification law, which includes data breaches of medical health information. The costs associated with defending a civil lawsuit, regardless of merit, can be devastating to a small IT solution provider and pose a significant barrier to entry.

To be clear, CompTIA believes that there should be strong and robust protections for the management, storage, and transmission of protected medical health data. However, when states are allowed to implement their own patchwork requirements, the results often pose a significant barrier affecting consumers, medical practices, and IT firms.

Did You Know?

The Poneman Institute recently calculated that the average cost of a data breach is $204 per compromised customer or patient record. This includes $144 in indirect costs and $60 in direct costs. The cost per record of a data breach involving a laptop computer or other mobile device is $225. These costs result from a complex web of competing and conflicting state data breach laws for protected medical information.

Source: For the Record: www.fortherecordmag.com/archives/013111p14.shtml

13 Commonwealth of MA: www.malegislature.gov/Laws/GeneralLaws/PartI/TitleXV/Chapter93H/Section3.

OPPORTUNITY

CompTIA strongly believes that there must be robust protection and enforcement of personal health information. Only by ensuring significant security precautions will we as a nation be able to usher in the opportunity surrounding health IT, from both a medical delivery and economic standpoint. Modifications to the provisions noted above can ensure significant protection of PHI while fostering a competitive and open environment for small to medium sized health IT solution providers.

Specifically, CompTIA believes that the HITECH Act should be revised to serve not just as the floor, but also as the ceiling for data notification requirements. CompTIA has long supported federal preemption for data breach standards and notification, and the evolution of HIPAA under the HITECH Act makes this an even more integral change for small HIT providers. One consistent law across the country with an agreed upon definition of a breach and notification time period, as well as elimination of private rights of action, could save small and medium size IT solution providers millions of dollars in reduced compliance and legal costs associated with data breach notification requirements. Such an approach would eliminate uncertainty and confusion as to what the obligation of a business would be in the event of a data breach.

CompTIA also supports the HIPAA liability model in place prior to the enactment of the HITECH Act. Under the HIPAA Privacy and Security Rules, business associates and related third parties had a contractual obligation to certify that an IT firm met the HIPAA privacy and security obligations. These certifications created a competitive incentive for IT firms to offer the highest standard of privacy and security compliance. Instead, the new framework of fines serves as a disincentive to new entrants that would otherwise offer competent IT services.

PART 6: CONCLUSION

Small IT solution providers are well positioned to play a significant role in the health IT transition as a result of their expertise and unique skill set. Given that the overall goal of health IT is to increase the quality of care and improve patient health, federal policies should allow medical providers to focus on patients and open the door for IT solution providers to focus on making the transition as efficient and effective and possible. A strong partnership between the federal government, medical providers, and the IT industry is critical to ensure a successful future for patient health as well as ensure strong economic benefits as a result of this transition. However, many federal programs and policies seeking to advance health IT and encourage broad support have left small IT solution providers on the sidelines, placing medical providers at a disadvantage and significantly burdening market entry for a vital component to our nation's IT industry.

Federal policies should reflect the important role small IT solution providers can play in the health IT transition and create avenues for them to fully participate. Doing so will help to expand adoption by medical providers and increase the quality of care to patients. Participation by small IT providers will also help drive job creation and retention, keeping America's small business backbone as an economic engine for generations to come.

Health IT has significant potential and opportunity. CompTIA and its member companies look forward to continued engagement and dialogue with policymakers to ensure that health IT is successful and that patients, small business, and our economy all see a healthier future.

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