

June, 2022

Dear iKnowMedSM MIPS-eligible Providers and Practices:

In an effort to align with CMS's High Priority Practices SAFER Guide Recommended Practices, this letter provides information and solution-specific examples for practices to consider in completing the standardized template made available at HealthIT.gov for providers attesting to the 2022 Promoting Interoperability MIPS category.

The information and documentation provided in this letter are for reference purposes only and are not intended as nor should be construed as legal advice or as a substitute for the original source documents and regulations. Practices and providers should consult the original source documents and other guidance published by CMS and The U.S Department of Health and Human Services. Practices and providers are solely responsible for (i) understanding and satisfying all requisite conditions, (ii) administering and using iKnowMed in accordance with the SAFER Guides, and (iii) complying with all applicable laws, rules, regulations, and administrative agency guidance.

The example content provided below is for reference only and is based on the functionality of Ontada's iKnowMed electronic health record (EHR) product offering. Practices and providers should complete SAFER self-assessments based on their specific facts and circumstances and should modify or supplement the examples below with practice-specific information.

Example SAFER Self-Assessment Content

Recommended Practices for Domain 1 – Safe Health IT

1.1 Data and application configurations are backed up and hardware systems are redundant.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:**
 - **Database Backups** - Backup is performed on a shadow database (DB) server every night. A full backup is performed each week, and incremental backups are performed on remaining days. Databases are continuously replicated to Disaster Recovery (DR), and logs are sent in 30-minute intervals.
 - **App Server Backups** - App servers are replicated to DR environment daily.
 - **Document NFS** - Documents are replicated to DR Network File System (NFS) daily.
 - **Disaster Recover Environment** - DR environment is a cold standby located in iKnowMed's data center. DR snapshots occur daily, and DR replication of the filesystems occurs at 11:40pm every day. iKnowMed DR database environment is a 1:1 mirror of production.

1.2 EHR downtime and reactivation policies and procedures are complete, available, and reviewed regularly.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** Ontada, the developer and provider of iKnowMed, maintains an annually updated Business Continuity Plan confirmed through an annual security risk assessment which ensures downtime and reactivation protocols are in place for the hosted infrastructure and general EHR functionality.

1.3 Allergies, problem list entries, and diagnostic test results, including interpretations of those results, such as “normal” and “high,” are entered/stored using standard, coded data elements in the EHR.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, EHR developer
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** Allergies, Results, and Problems data documentation are stored in iKnowMed data and are visible in the User Interface (UI) and tables which correspond with data points. Drug and environmental allergies are used to alert users to potential interactions when placing orders for the patient. Results are viewed and reviewed by providers and visible for the decision-making process. Problems are documented and their staging details are utilized as a part of clinical decision support. AJCC 8th edition is used to support the staging of Problems.

1.4 Evidence-based order sets and charting templates are available for common clinical conditions, procedures, and services.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, EHR developer, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** Users can document procedures for a specific appointment, pain score and pain care plan, depression status, performance status, screenings, health history, counseling and education, allergies, immunizations, and adverse events (CTCAE versions 3.0, 4.0, 4.03, and 5.0). These are stored in iKnowMed and are visible in the UI and tables which correspond with data points.

1.5 Interactive clinical decision support (CDS) features and functions (e.g., interruptive warnings, passive suggestions, info buttons) are available and functioning.

- **Stakeholders:** Clinicians, support staff, and/or, clinical administration, EHR developer, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** iKnowMed utilizes Clear Value PlusSM to complete the regimen selection process based on National Comprehensive Care Network (NCCN) guidelines. Clear Value Plus integrates staging and inference data associated with a problem and walks users through a decision-making process to search the database for the best possible matches. At times, the NCCN data may require additional staging details which can be entered through Clear Value Plus to further narrow the options. Users are prompted throughout the regimen ordering process to complete the necessary fields. Passive warnings include neutropenic and

emetogenic potential based on package insert and users also see regimens separated by NCCN compliance levels.

1.6 Hardware and software modifications and system-system interfaces are tested (pre- and post-go-live) to ensure that data are not lost or incorrectly entered, displayed, or transmitted within or between EHR system components.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, EHR developer, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** All hardware and software updates are tested in iKnowMed quality assurance (QA) environments before release to production. This includes changes as well: application configuration, software override properties, operating system configuration, operating system patches and NFS mounts for document storage. All changes also go through validation after release to production.

1.7 Clinical knowledge, rules, and logic embedded in the EHR are reviewed and addressed regularly and whenever changes are made in related systems.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** N/A

1.8 Policies and procedures ensure accurate patient identification at each step in the clinical workflow.

- **Stakeholders:** EHR developer, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** N/A

Recommended Practices for Domain 2 — Using Health IT Safely

2.1 Information required to accurately identify the patient is clearly displayed on screens and printouts.

- **Stakeholders:** EHR developer, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** The patient banner contains the patient's name (First, Middle, Last), DOB, Sex, Medical record number, and a photo (if utilized by the practice). The patient banner is visible in all areas of the chart. It is also visible when completing patient education and utilizing the Up-to-Date tool. Patient identifier data is visible in all provider review queues, when attaching documents, and on printed notes, reports, and audits.

2.2 The human-computer interface is easy to use and designed to ensure that required information is visible, readable, and understandable.

- **Stakeholders:** EHR developer, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** User design experts continually update the iKnowMed user experience. Part of the process involves user testing including assessing color-blind individuals and the visually impaired. iKnowMed also offers a mobile experience for IOS users.

2.3 The status of orders can be tracked in the system.

- **Stakeholders:** EHR developer, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** The system tracks an order through its lifecycle of draft, ordered, reviewed, discontinued, or complete. Reviewed status is visible upon view/print of orders.

2.4 Clinicians can override computer-generated clinical interventions when they deem it necessary.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, EHR developer, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** Clinicians can override medication and dose alerts by putting in their pin/password, they can make dose adjustments as they see fit, clinicians can choose regimens which fall out of guidelines (and document the exception based on practice level decisions). To activate this feature, navigate to Practice Preference's settings to enable pin entry.

2.5 The EHR is used for ordering medications, diagnostic tests, and procedures.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, Diagnostic services, Health IT support staff, Pharmacy
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** N/A

2.6 Knowledgeable people are available to train, test, and provide continuous support for clinical EHR users.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** For any questions, concerns, and support customers can contact their Technology Account Manager for assistance. Our support team can also be reached for issues that are time-sensitive.

2.7 Pre-defined orders have been established for common medications and diagnostic (laboratory/radiology) testing.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** N/A

Recommended Practices for Domain 3 – Monitoring Safety

3.1 Key EHR safety metrics related to the practice/organization are monitored.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, EHR developer, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** Per practice's established policies and procedures

3.2 EHR-related patient safety hazards are reported to all responsible parties, and steps are taken to address them.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, EHR developer, Health IT support staff
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples Outside EHR:** Patient safety-related defects and enhancement requests are tagged with a PM Grooming category of Patient Safety. The Severity is also documented on a scale of 1-4 with 1 being the most severe. This allows product, development, account management, and support the ability to document the degree of patient safety related to the reported hazard. Patient safety hazards are given the highest priority for resolution.
- **Examples Inside EHR:** Chart alerts, medication and dose alerts, adverse events, and treatment events which call out hazards to clinicians during patient care.

3.3 Activities to optimize the safety and safe use of EHRs include clinician engagement.

- **Stakeholders:** Clinicians, support staff, and/or clinical administration, Diagnostic services, EHR developer, Health IT support staff, Pharmacy
- **Status response:** *[Practice to complete based on facts and circumstances]*
- **Examples:** Per practice's established policies and procedures.

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