

ONC 2023

ANNUAL MEETING



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ANNUAL MEETING

Exploring the Relationship between Payment Models and Documentation Burden

Andrew Gettinger, Dartmouth (moderator)

Nate C. Apathy, MedStar Health

A Jay Holmgren, UCSF

S. Trent Rosenbloom, Vanderbilt University Medical Center

Sarah Rossetti, Columbia University

Anna Taylor, MultiCare Connected Care



Exploring the Relationship between Payment Models and Documentation Burden

Andrew Gettinger, MD

Professor emeritus



Dartmouth
GEISEL SCHOOL OF
MEDICINE

Session Description

This session will explore how the use of EHRs outside of traditional Fee for Service environments may play a role in documentation burden experienced by clinicians. This session will review a summary of current knowledge on the variation in documentation burden within different payment environments. Presenters will also discuss how the Trusted Exchange Framework and Common Agreement can address EHR burden.

Agenda

- **Brief Presentations**

Sarah Rossetti, Columbia University
Nate C. Apathy, MedStar Health
Anna Taylor, MultiCare Connected Care

- **Reactor Panel**

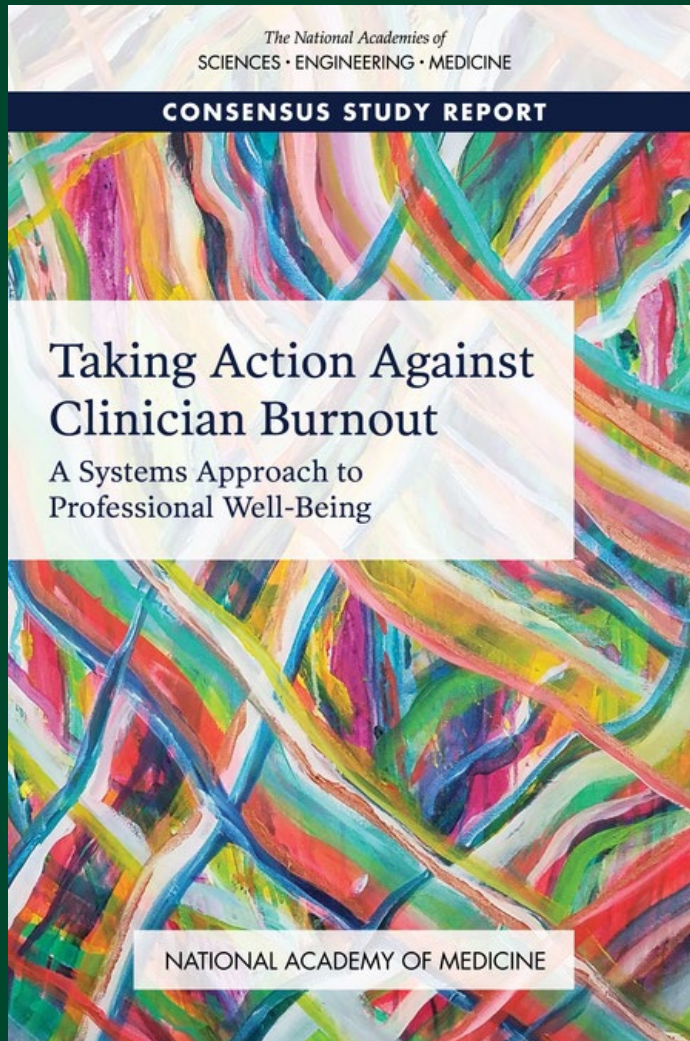
A Jay Holmgren, UCSF
Anna Taylor, MultiCare Connected Care
S. Trent Rosenbloom, Vanderbilt

- **Audience Questions**

Context Setting

- ARA HITECH Act 2009
 - Federal incentives to digitize – “meaningful use”
 - ONC established in statute
- 21st Century Cures Act 2016
 - Information blocking prohibited
 - TEFCA to support interoperability
 - **Clinician burden reduction report & efforts**
- Priority to give patient’s access to their data and to facilitate sharing among authorized parties

EHR's identified as a major contributor to burn-out



NAM Report 2019

Notes by US clinicians are 4 times longer than those in other countries

- Downing, N. L., D. W. Bates, and C. A. Longhurst. 2018. Physician burnout in the electronic health record era: Are we ignoring the real cause? *Annals of Internal Medicine* 169(1):50–51.

Essential Electronic Health Record Reforms for This Decade

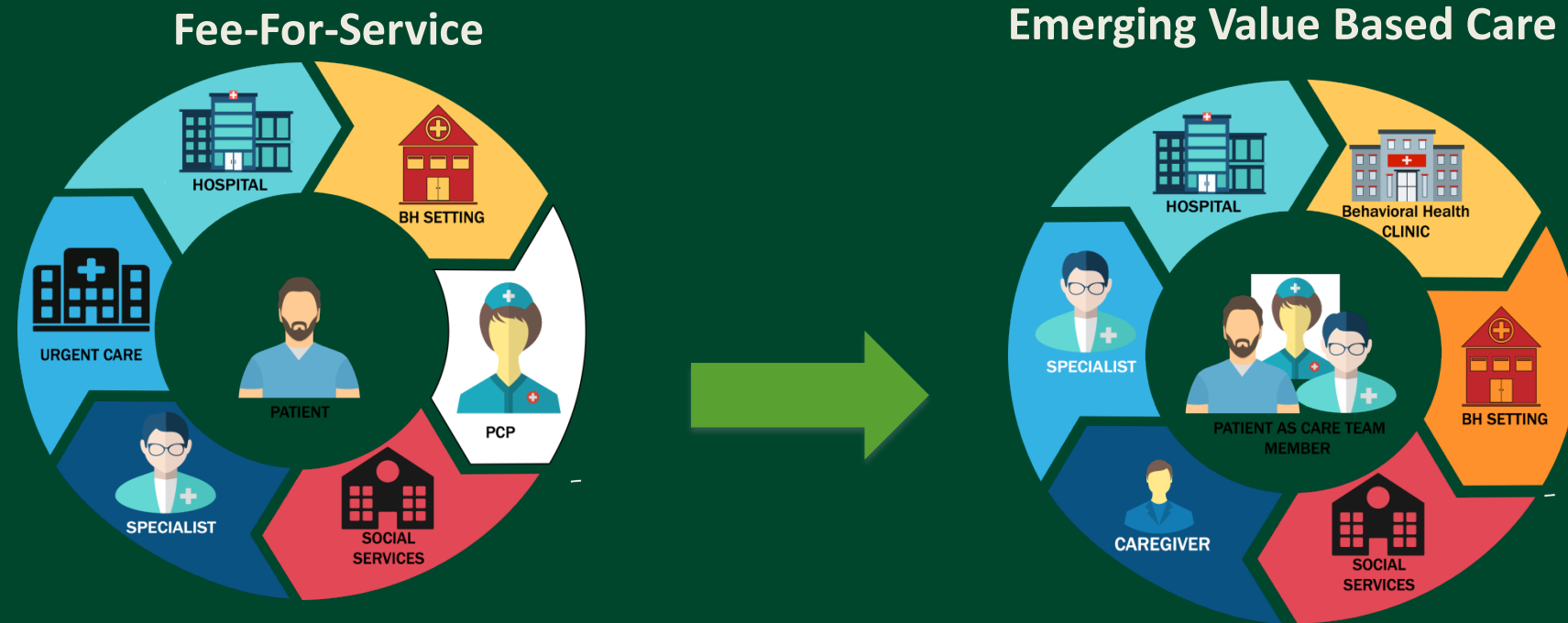
JAMA Viewpoint June 6, 2023

Don Eugene Detmer, MD, MA; Andrew Gettinger, MD

JAMA. 2023; 329(21):1825-1826. doi: 10.1001/jama.2023.3961

This Viewpoint posits suggestions to reform electronic health records (EHRs), including use of unique personal safety identifiers, reduction of administrative and regulatory content from clinical time, inclusion of patient-entered information into the EHR, and reinvention of the clinical note.

Transforming Landscape: Shift to Value Based Care



- Providers paid for volume of services, not outcomes
- Patients must navigate the health system
- Siloed delivery of care
- Limited information sharing and integration across settings (paper and electronic)

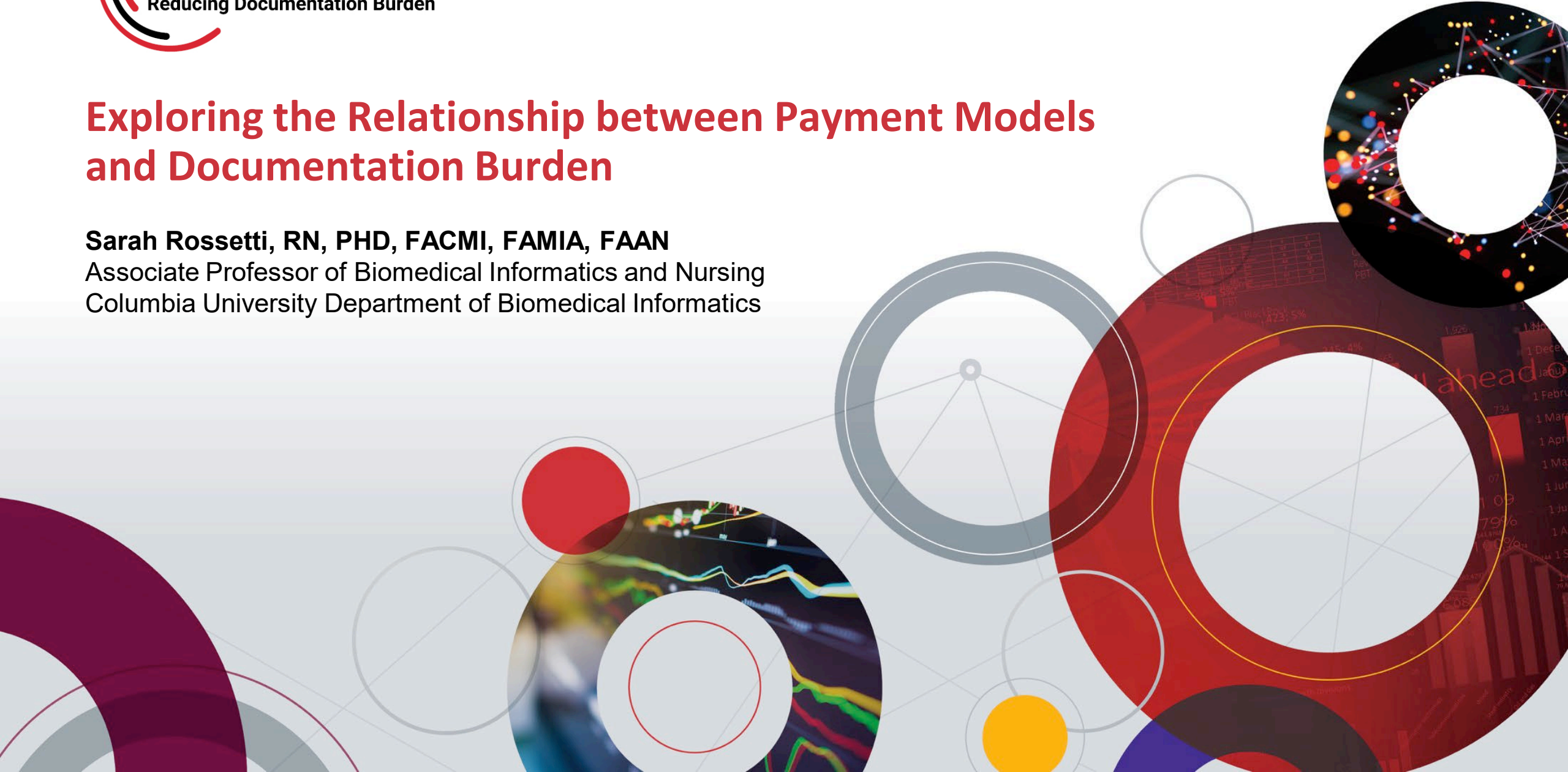
- Providers paid for health outcomes, not volume of services
- Care team includes individual and all allied providers
- Emphasis on use of technology to integrate care and share information



Exploring the Relationship between Payment Models and Documentation Burden

Sarah Rossetti, RN, PHD, FACMI, FAMIA, FAAN

Associate Professor of Biomedical Informatics and Nursing
Columbia University Department of Biomedical Informatics



AMIA's 25x5 Task Force



Mission

A U.S. healthcare workforce free of documentation burden and focused on patient care and improved patient outcomes.

Vision

Reduce U.S. health professionals' documentation burden to 25% of current state within five years. Optimize and spread across health systems impactful solutions that decrease non-value-added documentation and leverage partnerships and advocacy with health systems, professional societies, and public/private sector organizations.

Organized into 4 Workstreams

1. Impact
2. Health Professionals/Systems
3. Policy/Advocacy
4. Technology Requirements

Principles of Engagement

- No shifting of work to others
- No erosion of care standards
- Leverage technology and existing data inputs where appropriate
- Maximize clarity of proposed rules to minimize misinterpretation by health systems and providers.

Policy Briefs

25x5 Policy Reforms to Reduce Documentation Burden

25x5 Recommendations to Reform Prior Authorization



25x5 POLICY REFORMS TO REDUCE DOCUMENTATION BURDEN

It is 25x5's stance that the below policy reforms are imperative to reducing onerous and redundant documentation burden, which is imperative to maintain the healthcare workforce and improve patient access to necessary medical care.

25x5 is a Task Force within the American Medical Informatics Association (AMIA) that works to reduce U.S. health professionals' documentation burden to 25% by December 2026 with the vision of a U.S. healthcare workforce free of documentation burden and focused on patient care and improved patient outcomes. To achieve this vision, 25x5 prioritizes the following policy reforms:

- I. **Do Not Shift Burden** between clinicians, between clinicians and staff, or between clinicians and patients.
- II. **Eliminate Documentation Redundancy Through Technology**
 - a. **Data Liquidity & Interoperability:** Leverage technology to eliminate the need for duplicate entries. Utilize the Trusted Exchange Framework and Common Agreement (TEFCA) to enhance trust between data sharing entities.
 - b. **Support for FHIR®:** Continue to support Fast Healthcare Interoperability Resources (FHIR) as a standardized approach for the exchange of healthcare information.
- III. **Broaden Data Sources for Enhanced Information Access and Exchange**
 - a. **Data Capture Methods:** Increase the variety of ways through which data can be captured.
 - b. **Non-EHR Databases and Wearables:** Encourage the use of wearables, Internet of Things (IoT) devices, and non-EHR databases as supplementary data sources.
 - c. **Data Responsibility & Provenance:**
 - i. Identify parties responsible for data accuracy.
 - ii. Establish mechanisms to track and maintain data provenance.
 - d. **Data Literacy & Personal Health Records:**
 - i. Improve data literacy among all stakeholders.
 - ii. Integrate personal health records and enable data sharing from patients.
- IV. **Ensure Data is Easily Retrievable for Clinical and Research Use**
 - a. **Indexing, Data Tagging & Metadata:** Implement systems that utilize indices, metadata, and tags to make data retrieval straightforward and intuitive.
 - b. **Unstructured Data Search:** Employ natural language search capabilities within EHR systems to facilitate efficient data retrieval and extraction.
 - c. **Customizable Dashboards:** Develop user-friendly dashboards that allow clinicians to easily access relevant patient data.

October 2023



25x5 RECOMMENDATIONS TO REFORM PRIOR AUTHORIZATION

It is 25x5's position that prior authorization must be eliminated to reduce the required onerous documentation needed to support it, maintain the healthcare workforce, and improve patient access to necessary medical care. Prior authorization (PA) is a process used by health insurance companies, including Medicare Advantage (MA) plans, requiring clinicians to obtain approval before providing care to patients for covered services. This process is a major source of burden for clinicians, health systems, and patients in need of care.

25x5 is a Task Force within the American Medical Informatics Association (AMIA) that works to reduce U.S. health professionals' documentation burden to 25% by the end of 2026 with the vision of a U.S. healthcare workforce free of documentation burden and focused on patient care and improved patient outcomes.

To achieve this vision, 25x5 advocates for eliminating prior authorization entirely but recognizes that eliminating prior authorization will involve multiple changes implemented over time to ensure the benefits to stakeholders, including patients, clinicians, facilities, and health systems. Until prior authorization can be eliminated effectively, 25x5 supports the implementation of electronic prior authorization (e-PA) through the following:

Pass the *Improving Seniors' Timely Access to Care Act (H.R. 3173/S. 3018)* and relevant regulations that would establish a mechanism for real-time e-PA decisions for routinely approved items and services, require insurance plans to respond to PA requests within 24 hours for urgently needed care, and require detailed transparency metrics. Additionally, regulations must

1. Ensure that the process is not just paper prior authorization transferred into an electronic process in the transition to e-PA. The e-PA authorization process must be optimized for an electronic system to improve the goals of care, avoid redundancy, and allow for data liquidity.
2. Define the e-prior authorization workflow such that it doesn't shift burden between clinicians but rather eliminates burden or shifts to the appropriate administrative staff. Defining workflows can be accomplished by:
 - a. Insurance guideline transparency for how prior authorization process is being decided.
 - b. Avoid increasing documentation at any point in the process.
 - c. Create a clear description of why any authorization failed and differentiate between a system failure and payer denial. For example, if the automated system finds the indication for drug provided was unclear or insufficient, then a human interaction from the insurance payer must be available as a timely option for failure correction.

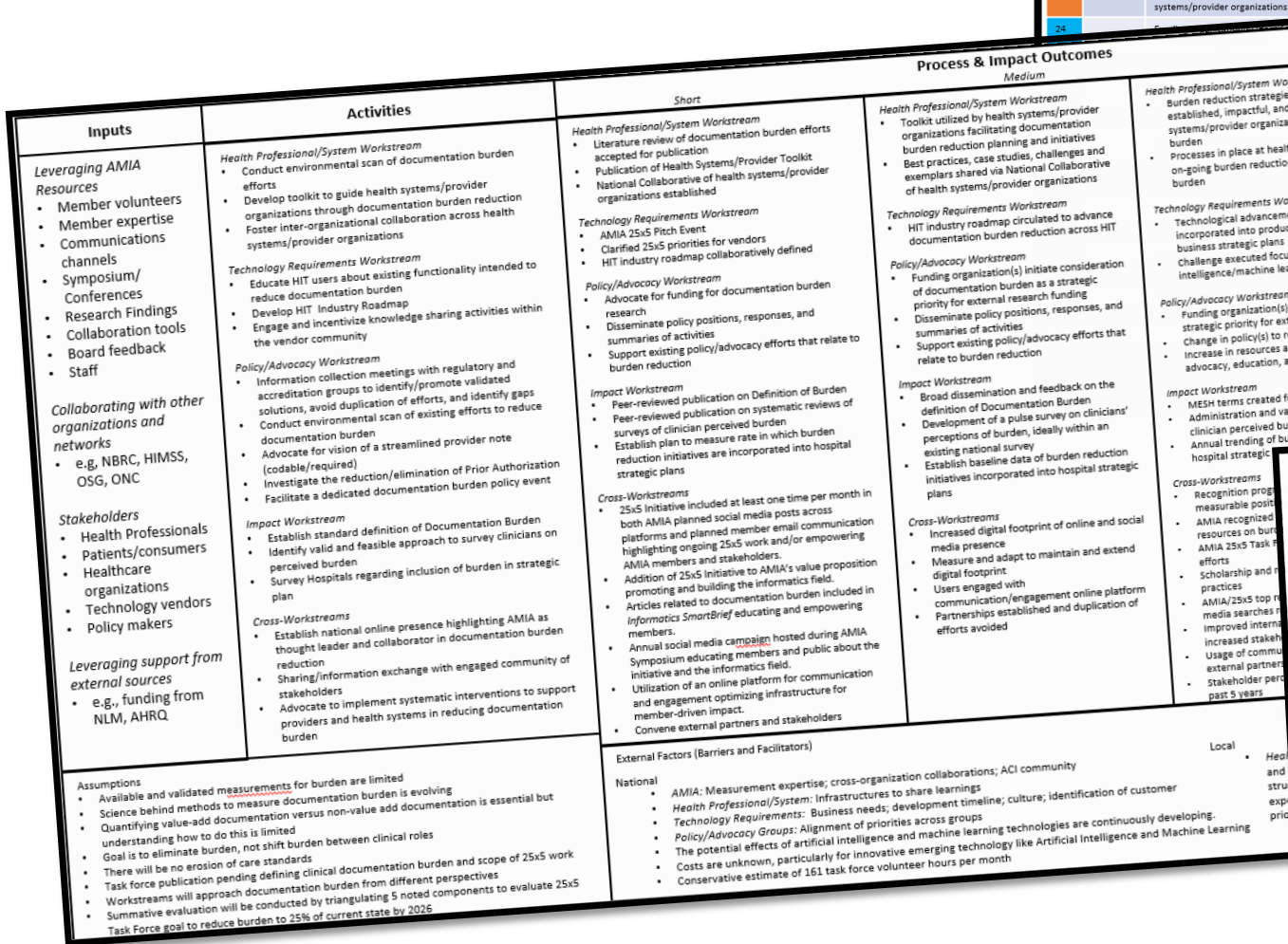
October 2023

25x5 Logic Model

Process & Impact Measures



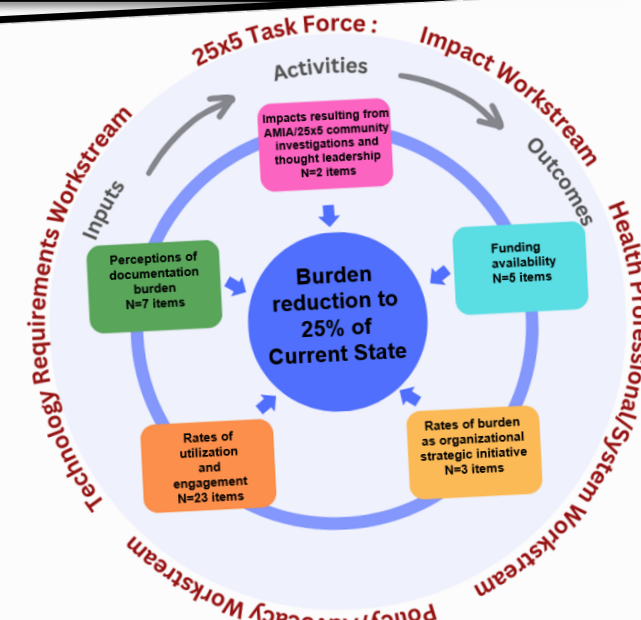
Item #	Process or Outcome	Impact	Measure(s)	Workstream Responsible (data collection and analysis)
19		Disseminate policy positions, responses, and summaries of activities	Count of policy responses, white papers, and peer-reviewed papers	Policy/Advocacy
20		Support existing policy/advocacy efforts that relate to burden reduction	Count of policy/advocacy efforts formally in support of	Policy/Advocacy
21		Convene external partners and stakeholders	Count of external partners and stakeholders engaged; descriptive statistics of roles, regions, and types of organizations engaged	Policy/Advocacy
22		Toolkit utilized by health systems/provider organizations facilitating documentation burden reduction planning and initiatives	Utilization rates stratified by setting type and geographical location; trending of utilization rates overtime	Health Professional/System
23		Best practices, pilots, challenges and exemplars shared via National Collaborative of health systems/provider organizations	Count of resources/assets shared across sites	Health Professional/System
24		Priority for external	Total dollars available for research funding	Policy/Advocacy



Five Components Triangulated to Evaluate Burden Reduction:

1. Perceptions of documentation
2. Impacts resulting AMIA/ 25x5 community investigations and thought leadership
3. Funding availability
4. Rates of burden as organizational strategic initiative
5. Rates of utilization and engagement

N = number of measured items from logic model that comprise each component

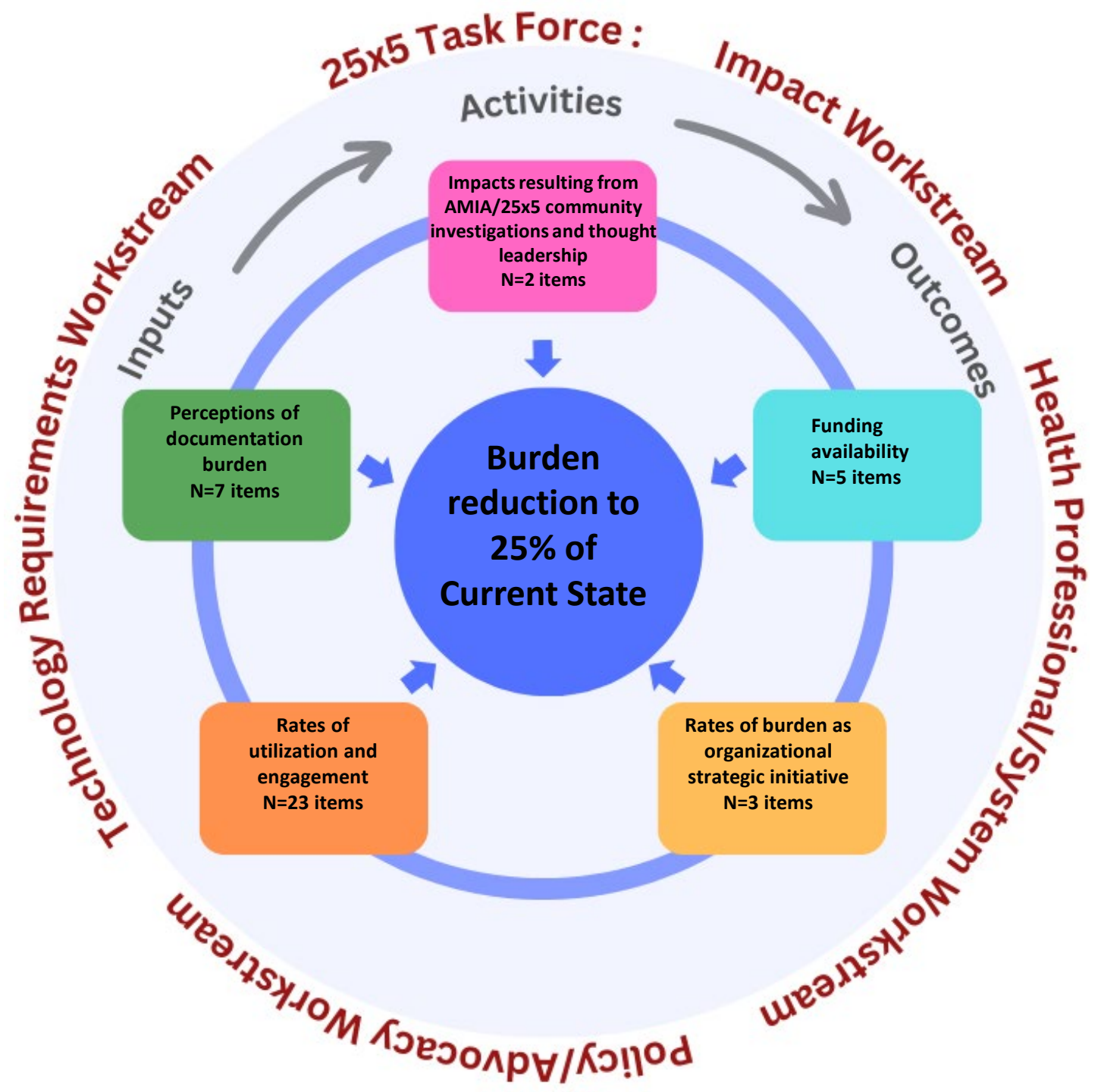


■ Burden as an organizational strategic initiative ■ Perception of documentation burden

Five Components Triangulated to Evaluate Burden Reduction:

1. Perceptions of documentation
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3. Funding availability
4. Rates of burden as organizational strategic initiative
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Measuring Perceived Documentation Burden & Trends Over Time

National Pulse Survey



Economic Analysis





Toolkit



AMIA 25x5 Toolkit

- A tool to guide organizations through the process of reducing documentation burden
- Provides resources and a pragmatic approach to documentation burden reduction
- 1000 downloads to date



Convening & Partnering

New! 25x5 Community

Open to everyone

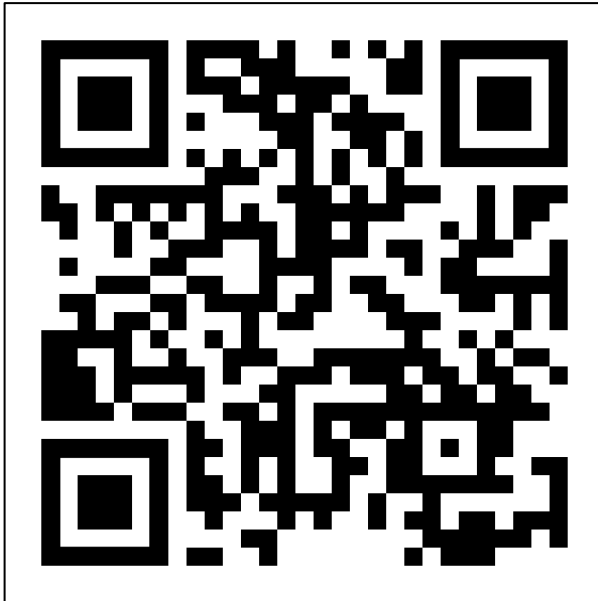
The 25x5
Community is
now on Slack.
Join to chat
and
collaborate on
all things related to 25x5 and
reducing documentation burden.



The 25x5 Toolkit channel is the
space to connect with others
using the Toolkit and share
resources, information, and
roadblocks.

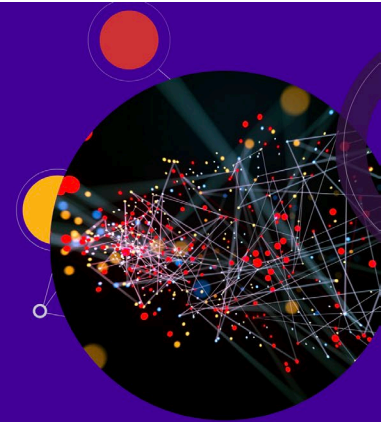
Join the Slack community

Stay informed via email or
provide feedback



AMIA convenes national leaders tackling burden reduction in clinical settings Pacesetters come together to discuss the future of AI to support burden reduction

November 16, 2023



Washington, DC – For a second year in a row, the American Medical Informatics Association (AMIA) hosted the National Burden Reduction Collaborative (NBRC), during the AMIA 2023 Annual Symposium, November 11-15, in collaboration with the Association of Medical Directors of Information Systems and the Alliance for Nursing Informatics. The NBRC spent Tuesday, November 14, sharing progress made over the last year across the Collaborative addressing key priorities. The Collaborative dedicated a majority of the agenda to discussing the potential of artificial intelligence (AI) technologies to significantly reduce clinician burnout and improve clinician wellbeing by addressing the documentation burden.

<https://amia.org/about-amia/amia-25x5>

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Chair: AMIA 25x5 Task Force

Associate Professor of Biomedical Informatics and Nursing
Columbia University Department of Biomedical Informatics

<https://amia.org/about-amia/amia-25x5>



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#WhyInformatics

Literature Review of Electronic Health Record Documentation Burden Analysis in and Outside the Fee-For-Service Payment Model

Deliverable 4: Project Summary

Prepared for:

Office of the National Coordinator for Health Information Technology (ONC)
U.S. Department of Health and Human Services
330 C Street SW
Washington DC 20001

August 31, 2023

Contract Number: GS35F0565T-140D0420F0486

Program Officials: Tricia Lee Rolle, PharmD, MS, PhD & Vaishali Patel, MPH PhD

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Burnout linked to documentation burden

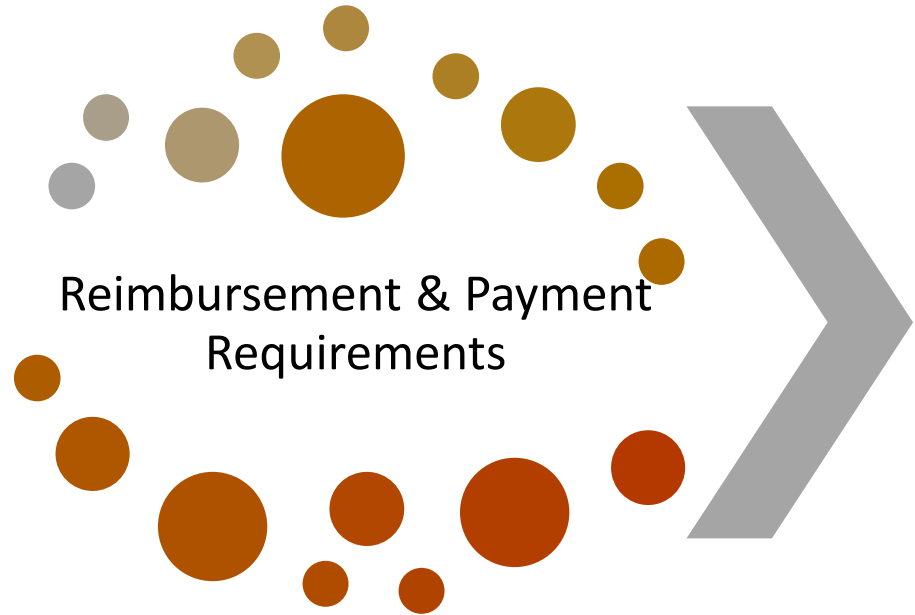
COVID-19 has exacerbated clinician burnout (Shanafelt, et al 2022; Linzer, et al 2022)

Established link between EHR time and burnout (Adler-Milstein, et al 2020; Gardner, et al 2019; Hilliard, et al 2020; Tai-Seale, et al 2023)

Physicians rank “reduce time on documentation” as the most important intervention for improving wellbeing (Aiken 2023)

Reducing physician documentation burden has become a national policy priority and a focus for delivery organizations (Apathy, et al 2022; AMIA 25x5)

Why do we care?



Documentation Burden

Burnout
Reduced FTE
Departure

In theory, value-based payment models should reduce documentation burden relative to traditional fee-for-service arrangements where clinical documentation is used for “justification” of billing



Narrative Review of Evidence

Little empirical evidence exists directly comparing documentation burden across payment environments. Burden exists in integrated payer-provider systems (e.g., Kaiser Permanente) and more homogenous payment environments (e.g., VA) in the US, but direct comparisons have not been done.

Summary of Findings 30 total articles

Overall, little evidence directly assessing the relationship between the payment environment and documentation burden.

Considerable speculation and hypotheses that payment-related demands drive documentation burden for US clinicians, but few directly compare burden in one environment vs. another.

Documentation
& Payment in
the US

International
Comparison
Studies

Proposals to
Reduce Burden

New Evidence

from the National Electronic Health Records Survey (NEHRS)

Participation in accountable care organizations (ACOs) is uniquely associated with increased documentation burden among office-based physicians, compared to other value-based payment programs and incentive programs. Physician-owned practices report greater ease of documentation in the EHR, but other dimensions of burden do not meaningfully differ across practice ownership models.

Approach: Analysis of NEHRS 2019 & 2021



National Center for Health Statistics



National Electronic Health Records Survey

Nationally representative annual survey of non-federal US office-based physicians

Our sample: Only respondents who reported using an EHR

Survey Year	Response Rate	Raw N	Weighted N
2019	37.7%	1,372	271,177
2021	45.9%	1,694	355,420

Documentation Burden in NEHRS 2019 & 2021

Table 1. Office-Based Physician Sample Characteristics

	Overall	No Program Participation	Any Program Participation
<i>weighted n</i>	626,598	225,751	400,847
Outcomes			
Time spent documenting in the EHR for clinical care is inappropriate (% agree or strongly agree)	60.0	54.7	62.9
Very or somewhat difficult to document clinical care in the EHR (% agree)	36.0	34.7	36.8
Spend more than 1 hour per day on average documenting outside of clinic hours (%)	76.1	70.9	79.0
Minutes spent per day documenting outside of clinic hours (mean, sd)	110.84 (69.58)	101.05 (69.56)	116.36 (69.00)

ACO participation is reliably associated with greater documentation burden

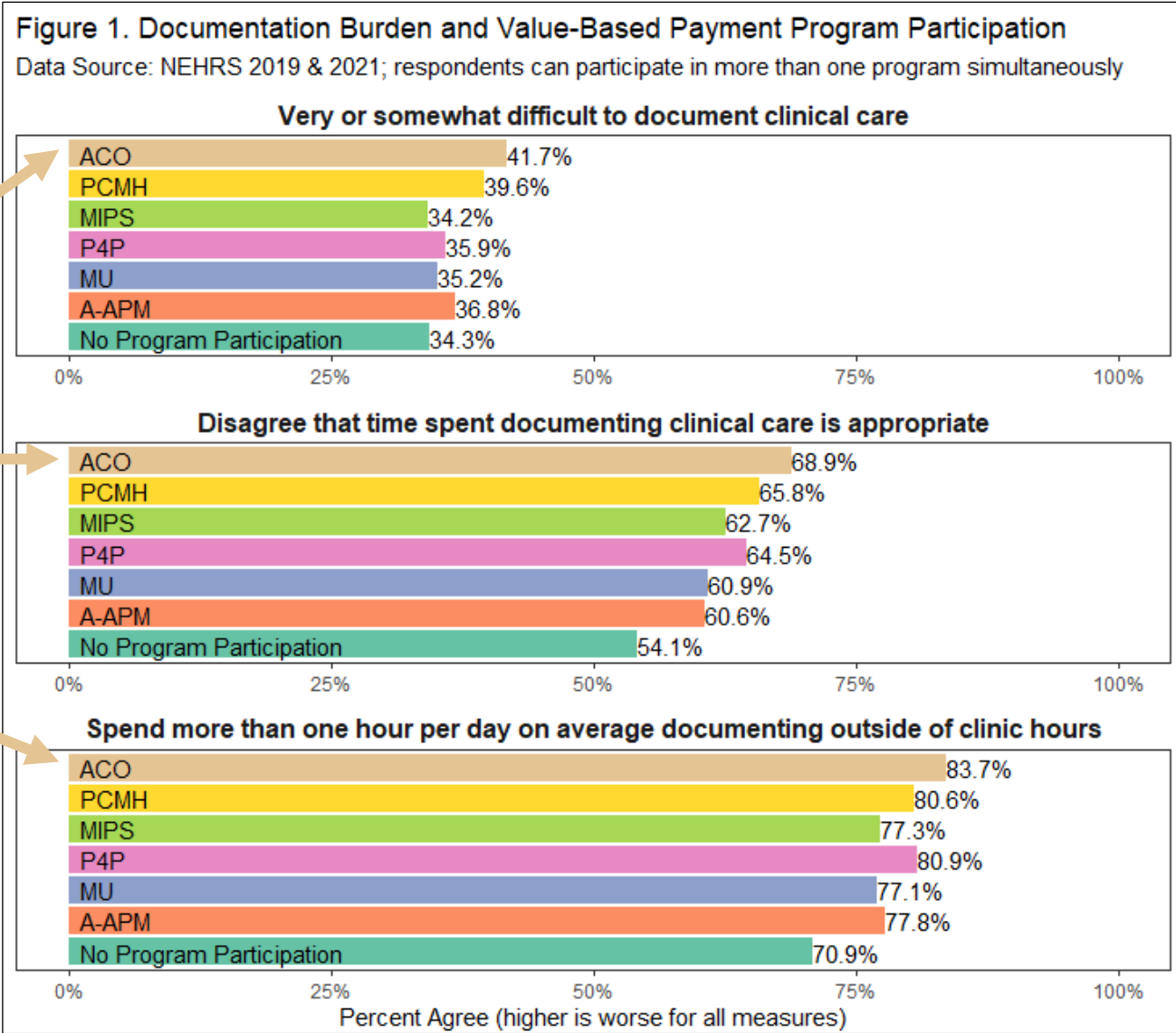


Table 2. Association between VBP program participation and EHR burden outcomes

	EHR Burden Outcomes			
	<i>Time spent documenting in the EHR for clinical care is inappropriate</i>	<i>Very or somewhat difficult to document clinical care in the EHR</i>	<i>Spend >1h per day documenting outside of clinic hours</i>	<i>Minutes spent per day documenting outside of clinic hours</i>
	<i>B (se)</i>	<i>B (se)</i>	<i>B (se)</i>	<i>B (se)</i>
<i>VBP Participation^a</i>				
Any VBP Participation	0.06 (0.04)	0.01 (0.03)	0.08* (0.03)	11.02* (4.95)
<i>Individual Program Participation^b</i>				
PCMH	0.00 (0.04)	0.01 (0.04)	0.01 (0.03)	0.70 (5.14)
ACO	0.13*** (0.03)	0.11*** (0.03)	0.09** (0.03)	18.03*** (4.76)
Pay for Performance	-0.02 (0.04)	-0.07 (0.04)	0.00 (0.03)	4.55 (5.69)
Meaningful Use	-0.04 (0.03)	-0.04 (0.03)	-0.01 (0.03)	-8.39 (4.78)
MIPS	0.01 (0.04)	-0.04 (0.03)	0.02 (0.03)	2.15 (5.31)
Advanced APM	-0.08 (0.06)	0.01 (0.06)	-0.06 (0.06)	-10.11 (8.44)
<i>Practice Ownership^b</i>				
Physician or physician group	reference	reference	reference	reference
Ins co, health plan, or HMO	0.01 (0.11)	-0.07 (0.07)	-0.06 (0.10)	-15.67 (14.19)
Community Health Center	-0.02 (0.08)	0.16 (0.08)	-0.10 (0.07)	-13.46 (9.90)
Medical or Academic Health Center	0.05 (0.05)	0.12** (0.05)	-0.02 (0.04)	-2.63 (6.77)
Other	0.01 (0.04)	0.09* (0.04)	-0.05 (0.04)	-6.93 (5.71)
<i>Staff Support for Documentation^b</i>				
No Support	reference	reference	reference	reference
Staff Support	-0.11** (0.03)	-0.08** (0.03)	-0.04 (0.03)	-2.41 (4.76)
Outcome Mean	0.60	0.36	0.76	110.84

^aVBP participation was defined as indication of any participation in any of the six available programs in both NEHRS 2019 and 2021. Estimates for this independent variable are from ordinary least squares regression models adjusting for practice ownership, practice size, treatment of Medicare and/or Medicaid patients, EHR vendor, staff support for documentation, physician sex, physician age, physician specialty, and survey year.

^bIndividual VBP program participation was not mutually exclusive. Estimates for individual program participation and practice ownership variables are from the same ordinary least squares regression models, which adjust for the same covariates noted above. *p<0.05; **p<0.01; ***p<0.001

Discussion

Analyses of “value-based payment program participation” measured in aggregate are masking ACO-specific documentation burden

Relaxing *reimbursement-related* documentation needs may not eliminate documentation for other reasons (e.g., quality reporting, risk-adjustment)

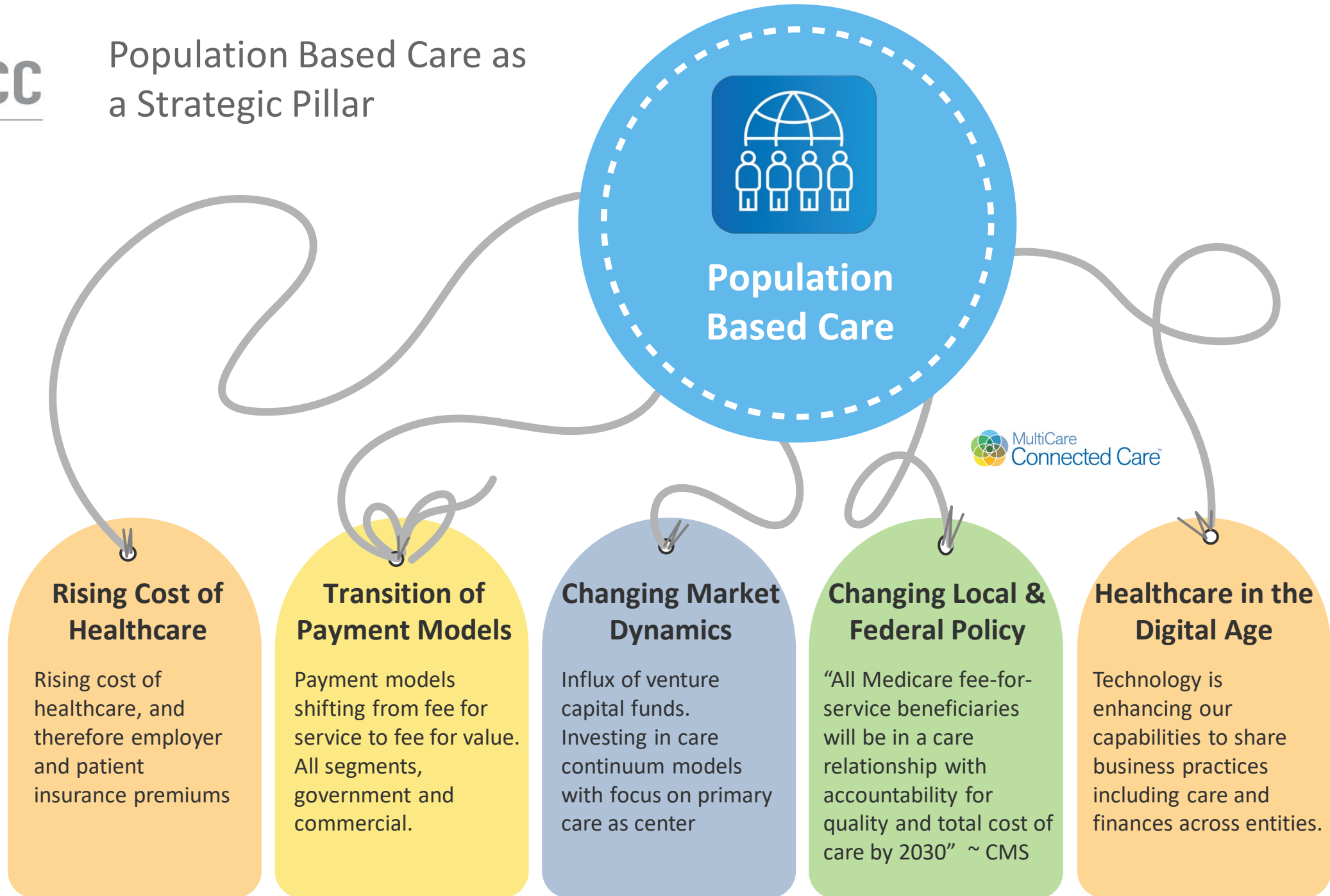
Given “FFS chassis” that many ACOs still employ, clinicians in these arrangements may get the *worst of both worlds*

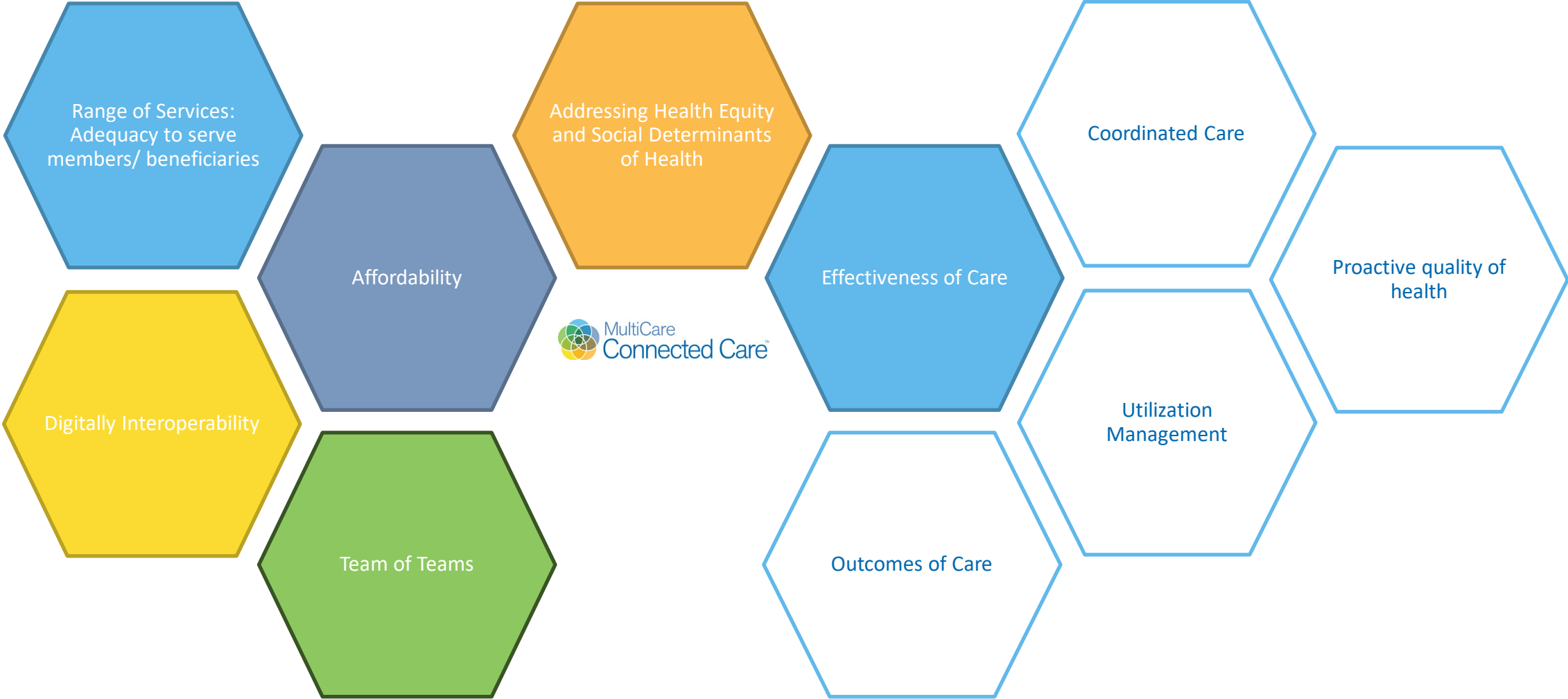
Still have to document for reimbursement **plus** ACO documentation needs

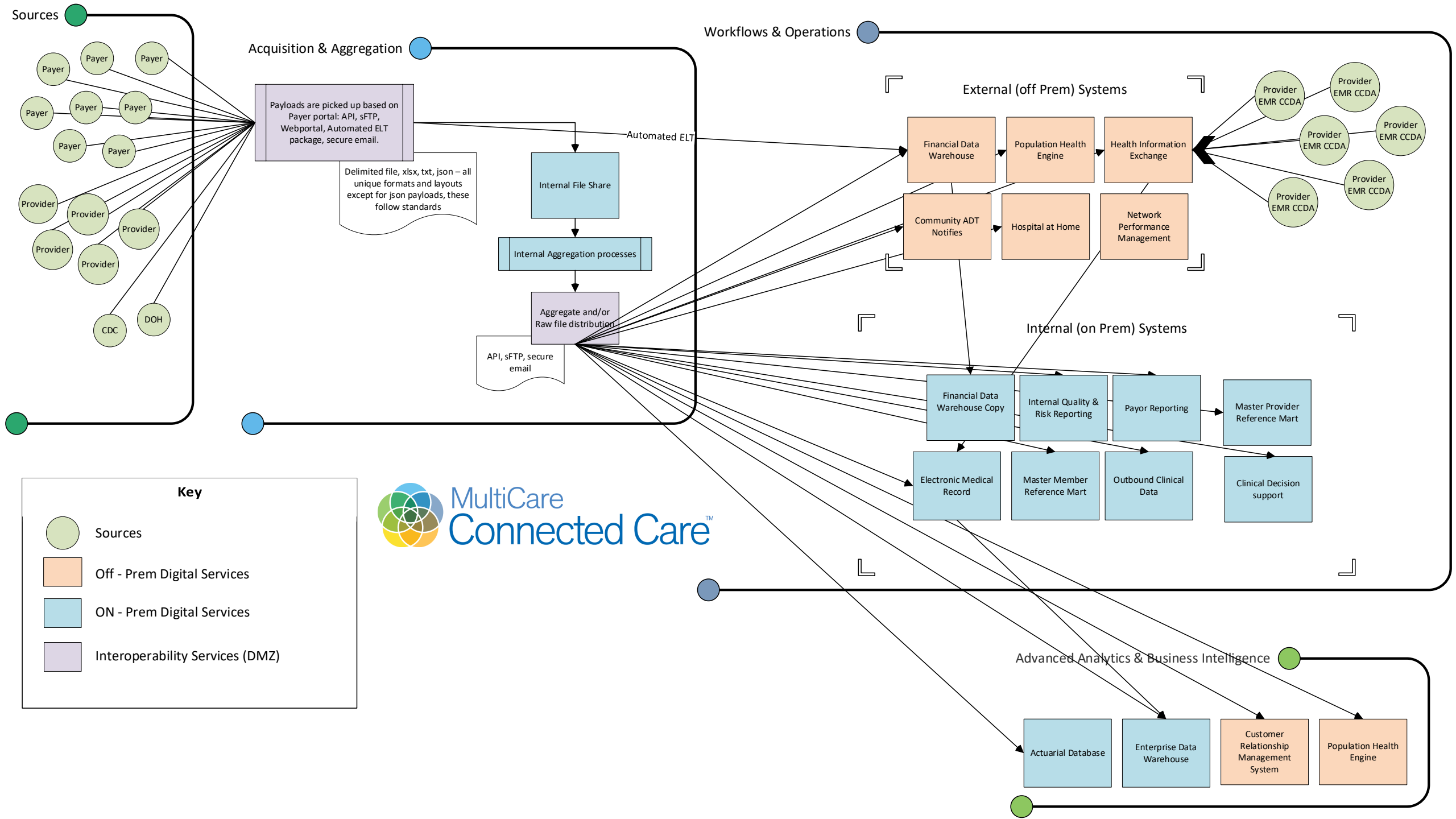


MultiCare Journey

Population Based Care as a Strategic Pillar







MultiCare's FHIR & API Adoption Journey

- » **2018** – Joined DaVinci with sponsorship through Cambia
- » **2019** – Proof of concept for quality measures reporting – MHS internal development, returns development investment in year 1.
- » **2020** – Proof of concept for eligibility
- » **2021** – Prior Authorization Trading Agreements
- » **2022**
 - April: Formal approval from CMS for Waiver Exception to utilize FHIR for Prior Authorization
 - Oct: Go Live for Smart Authorization and proof of concept for scalable FHIR services
 - DaVinci Steering Committee representation
 - Dec: scalable FHIR ecosystem
- » **2023**
 - FHIR Services
 - Eligibility scaled to multiple payers, creating 97% or higher match rates
 - Scaling Data Exchange for Quality Measures to multiple payers
 - Full scale API Management ecosystem

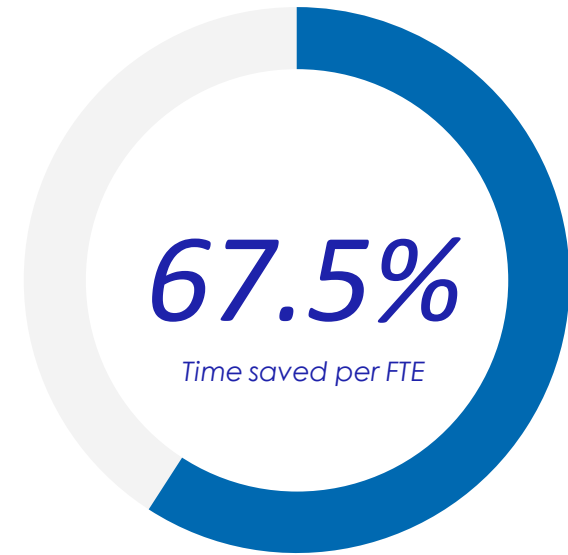
Measuring the Value – Risked Based Membership (ATR)



Decrease in Patient
Matching Error Rates



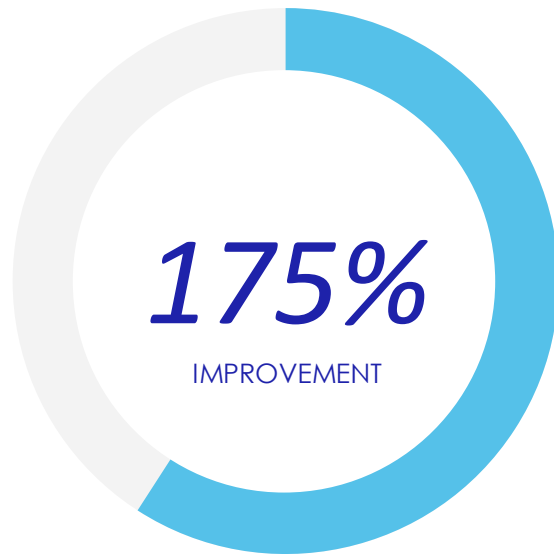
Burden reduction from
processing matching errors



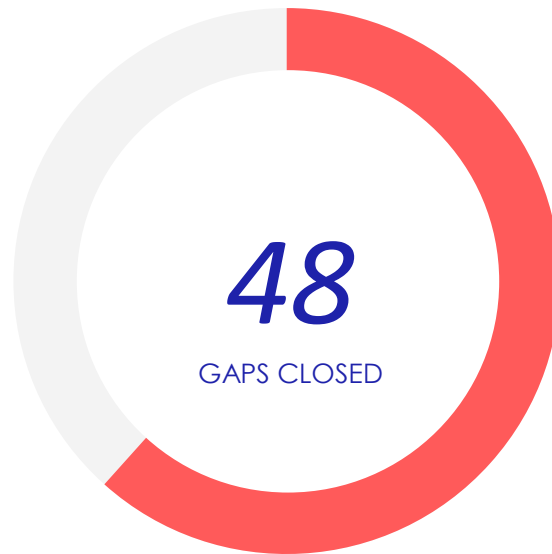
Efficiency gains to be
redirected to other activities



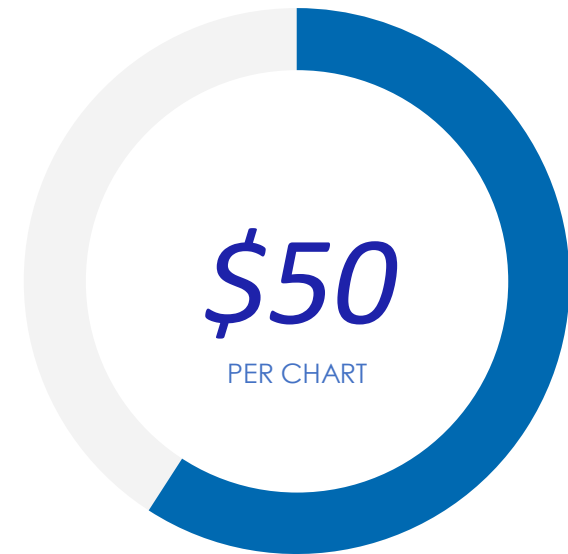
Measuring the Value – Quality Reporting (Data Exchange for Quality Measures - DEQM)



MultiCare MRP performance improvement



Additional Gaps Closed



Reduction in Chart Chasing

Automating Prior Authorization with Standard Interoperability

After 90 days of usage at MultiCare...

BEFORE

3 to 5

Prior Auth Requests
Processed per Hour

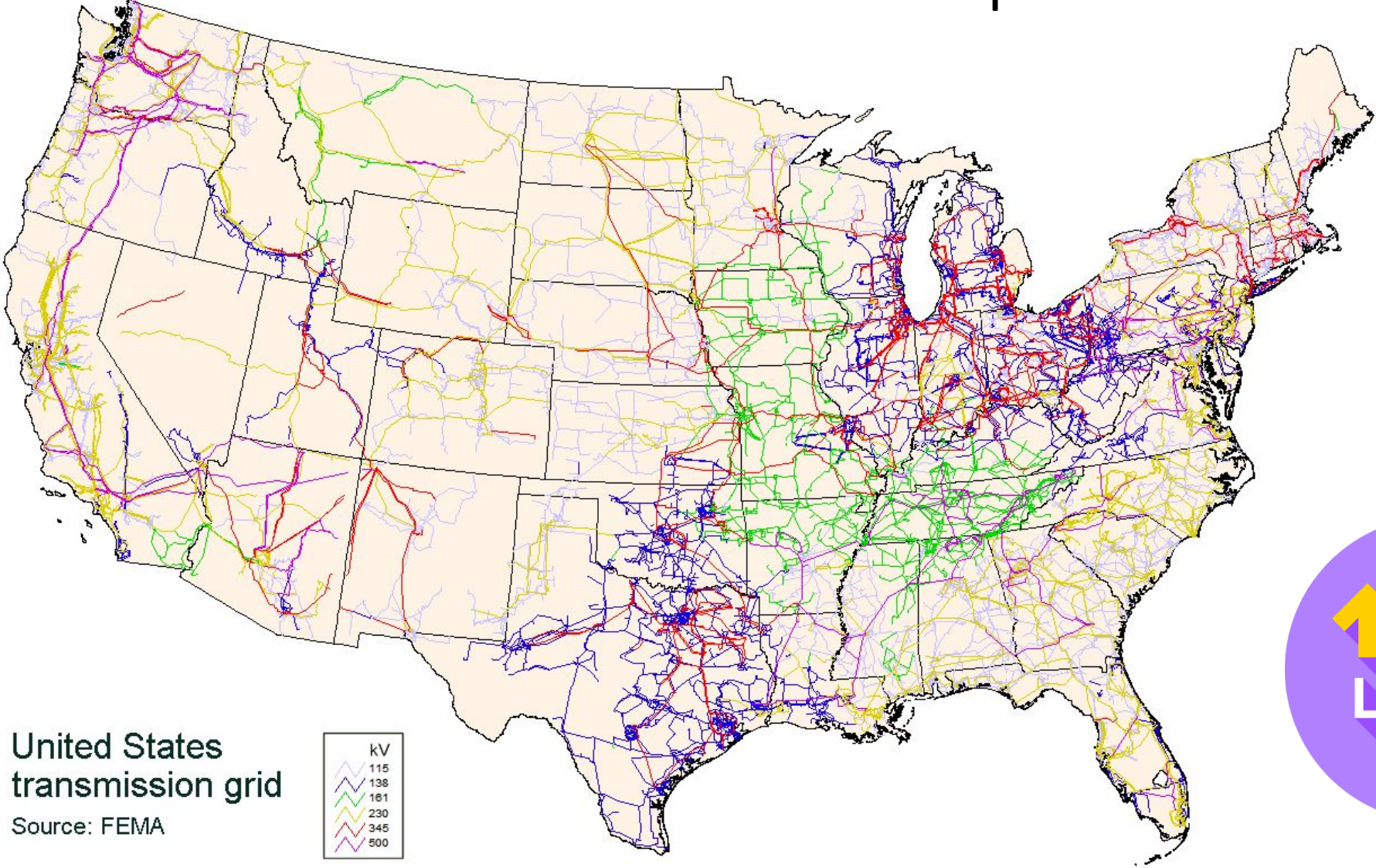
AFTER

10 to 12 Prior Auth Requests Processed
per Hour

140% to 233 %
Increase in PA Productivity



Network to build upon...



United States transmission grid

Source: FEMA

kV
115
138
161
230
345
500



Discussion



Thank You for joining us today

Please email if you have further questions or comments:

Andy Gettinger (andrew.gettinger@dartmouth.edu)



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