

San Antonio Community Hospital Electronic Health Records – Physician

Purpose: To improve the delivery of patient care by connecting physician office computer systems to the hospital's electronic health records and related system functionality.

Policy: SACH will make donations to physician practices up to \$7500.00 per physician (individually or as individual physicians in a physician group in a manner consistent with applicable law, regulation, guidelines and this policy).

Procedure:

1. **Requirements** – In order for a physician or physicians in a group to be eligible for a donation per this policy, the physician or group must meet the following requirements:
 - a) The software must be necessary and used to create, maintain, transmit or receive health records. The system may include administrative functions such as scheduling, billing and clinical support in addition to electronic health records.
 - b) The system must include electronic prescribing that allows the physician/group to send orders electronically to retail pharmacies and otherwise meet the requirements of Medicare Part D (See Section 423.160).
 - c) The system must be certified by CCHIT or other CMS certified organizations thereby providing interoperability with the SACH system and other HER systems.
 - d) The physicians must be members of the SACH Medical Staff.
 - e) Physicians seeking donations for electronic medical records need to reasonably demonstrate that the system that they intend to implement provides an electronic health record component that is new to the doctors system or that the system provides upgrades that improve functionality. If the system the physician is purchasing is being provided by a vendor that is preferred by the hospital (i.e. is proven to connect to the hospitals system and provides effective system support) the physician will meet this requirement. Notwithstanding this outcome, the physician needs to provide information regarding any items or services that enhance the functionality of the system when compared to the existing system. The hospital will not provide a donation if there is a like for like replacement of an electronic health record.
 - f) Physician payment of the share of cost must be evidenced prior to the hospital making a donation (please refer to sections 3 and 4 below).
 - g) Donations will not be predicated on the volume or value of referrals to the hospital.

2. **Covered Costs** – SACH will provide support to qualifying physicians through donations for the following documented costs:
 - a) Software or information technology used to create, maintain, transmit or receive electronic health records. This includes interface and translation software as well as license, rights and intellectual property related to electronic health records.

- b) Training of the physician and the physician's staff related to the operation of the physician's system.
- c) Help desk support costs provided by physician's EHR vendor
- d) Maintenance services
- e) Hardware costs are not covered under this policy. Hardware not covered includes routers and modems.
- f) Broadband and wireless fees are not covered under this agreement.
- g) Items also not covered in this policy include storage devices; software with core functions other than electronic health records (i.e. human resources and payroll); systems used by physicians primarily to conduct personal business; and, cost related to the transfer of data from an existing system to a new system.
- h) For physicians who access an electronic health record utilizing an ASP system provider, SACH will pay its share of initial set-up expenses and periodic subscription and related fees as long as the system meets all of the other requirements of this policy including but not limited to functionality and interoperability.

3. Process

- a) The physician shall confirm as applicable that the new system
 - i. Provides electronic health record capability that had not existed in the system being replaced; or,
 - ii. Provides upgrades that enhance functionality when compared to the system being replaced including but not limited to being more user friendly or adding functional features or tools

The hospital IT department shall review the information required under this paragraph and will validate the information provided. If the physician meets item (i) or (ii) then the hospital may proceed with the final steps leading to a donation. The hospital IT department will review the information provided with regard to (iii) and must confirm the upgrades claimed prior to a physician being qualified for a donation using solely (iii) as justification.
- b) A physician/group shall obtain actionable quotes for the delivery of an office electronic health record system that has the features and services noted above.
- c) The hospital and physician shall agree on the covered items and related costs.
- d) The hospital and physician shall enter into an agreement in writing for a term of not less than one year and a term that does not extend beyond December 31, 2013 (unless applicable rules are amended). The agreement will include an exhibit to the contract that will be a schedule of items that will be covered under this policy. This exhibit to the agreement will also specify both the Physician and SACH's share of the approved costs (15% and 85% respectively). The Exhibit should also specify any items that are not subject to cost sharing and for which the physician is 100% responsible under this policy, such as hardware. The agreement will govern the hospital's donation to the physician and will include the items covered as well as the costs agreed to by the hospital and physician. It shall also set forth the amount of the donation by the hospital to the physician consistent with the requirements of this policy.
- e) SACH shall retain a copy of the quote or purchase order noting those items that have been approved as being consistent with this policy.

4. **Payments**

- a) Upon execution of the Agreement referenced in Section 3 of this policy, and prior to receiving the technology and training services, the physician shall pay vendor 15% of the covered costs. If the hospital is the purchaser or provider of the services or software, the physician shall pay the 15% directly to the hospital and the hospital shall in turn pay the vendor.
- b) Hospital shall donate 85% of the covered costs up to a maximum of \$7500.00 for the initial implementation of the physician's system.