



September 18, 2018

Donald Rucker, M.D.
National Coordinator for Health Information Technology
Office of the National Coordinator (ONC)
U.S. Department of Health & Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Re: Request for Public Comments: Interoperability Standards Advisory

Dear Dr. Rucker,

Michigan Health Information Network Shared Services (MiHIN) is pleased to submit these comments in response to the Office of the National Coordinator's (ONC) Request for Public Comments regarding the Interoperability Standards Advisory (ISA).

MiHIN is Michigan's initiative to improve health care quality, efficiency, and patient safety through sharing electronic health information while reducing costs. Since 2011, MiHIN has been the state-designated entity for health information exchange across Michigan. MiHIN ensures effective technology and data models are in place for health information exchange and oversees a shared governance model that provides the legal framework and policy infrastructure to safeguard and standardize the transfer of health information. Michigan's network has grown quickly: since entering full production in 2012 more than 2 million PHI messages daily, with more than 1.8 billion PHI messages successfully processed since inception messages have successfully passed through MiHIN, including public health reporting messages for immunizations, syndromic surveillance, reportable labs, clinical quality measures and other Meaningful Use/public health use cases.

MiHIN has just begun to use the ISA as a resource and we recognize its value as a comprehensive repository for most standards. Our attached comments include recommendations for additional changes to functionality to enhance the user experience and additional resources to help stakeholders better understand the ISA, health IT standards, and interoperability.

We appreciate having this opportunity to provide comments on the Interoperability Standards Advisory 2018 Reference Edition. MiHIN looks forward to working with the ONC, Centers for Medicare & Medicaid Services, providers, consumers, and vendors across the nation to leverage technology to improve interoperability and access and enhance quality of care and improve health outcomes.

If you have any questions or remarks about MiHIN's comments, please contact me at tim.pletcher@mihin.org.

Sincerely,
DocuSigned by:

A handwritten signature in black ink that reads "Tim Pletcher". The signature is enclosed in a blue DocuSign signature box.

5769E59E66C6412
Tim Pletcher, D.H.A.

Executive Director
Michigan Health Information Network
Shared Services (MiHIN)

General Comments

18-1. In what ways has the ISA been useful for you/your organization as a resource? ONC seeks to better understand how the ISA is being used, by whom, and the type of support it may be providing for implementers and policy-makers.

The Michigan Health Information Network Shared Services (MiHIN) is the state-designated entity for health information exchange across Michigan. We recently discovered ISA and immediately recognized its usefulness as a resource. It represents a comprehensive repository of major ontologies, standards, and tools useful for most standards of implementation. However, to increase the adoption level of the ISA, it would be useful if users understood the different classes of provider type or geography that has the most adoption.

Although MiHIN has only recently begun to utilize the ISA Reference Edition, it will be undoubtedly beneficial as national interoperability is prioritized through the Trusted Exchange Framework and Common Agreement (TEFCA). The draft TEFCA requires that Qualified Health Information Networks (QHINs) comply with interoperability standards identified in the ISA. We see this requirement as a positive aspect of the framework. The ISA Reference Edition will provide important information on the identification and assessment of interoperability standards and implementation specifications. MiHIN can incorporate these standards into its existing use cases to stay at the forefront of national interoperability needs. We intend to use future ISA comment periods to shed light on which of these standards have benefitted our practices, or conversely, which standards could be tweaked to ensure more effective data sharing.

18-2. Over the course of 2018, some new functionality has been added to the ISA, with more enhancements expected through 2018 and 2019. Are there additional features or functionality that would enhance the user experience?

The current listing, while comprehensive, is healthcare-centric. As such, it does not support the social determinants of health directly affecting the National Information Exchange Model (NIEM). To increase ISA's relevance for EHRs, consider the social determinants of health and adjacent domains addressed in the NIEM Technical Architecture. It should also address the National Evaluation System for health Technology (NEST), which can efficiently consolidate Real-World Evidence (RWE) from clinical registries, electronic health records, medical billing claims, patient-mediated data, and other sources to inform medical device development and evaluation, support regulatory decision-making throughout the total product lifecycle (TPLC), and deliver information to large groups of stakeholders.

Additionally, consider leveraging backend application programming interfaces (APIs) to allow users to access certain standards from the ISA site, rather than simply providing a link

that directs the user to external sites for signup/login. By adding in these additional features, this would also increase the functionality of the ISA which would enhance the users experience.

18-3. Is the existing ISA format used for listing standards and implementation specifications applicable for listing Models and Profiles? Are there additional or different attributes that should be collected for them? Are there additional models and/or profiles that should be listed? Are models and profiles useful for inclusion in the ISA?

MiHIN does not have sufficient user experience to contribute to this section.

18-4. Are there additional informative or educational resources that can be provided to help stakeholders better understand the ISA, health IT standards, interoperability, etc?

The ONC should consider providing additional educational resources to increase stakeholder awareness and understanding of the ISA. This could be accomplished at various national conferences (e.g. Healthcare Information and Management Systems Society [HIMSS], Strategic Health Information Exchange Collaborative [SHIEC], American Medical Informatics Association [AMIA], and ONC events).