February 11, 2016

Karen DeSalvo, MD, MPH, MSc
National Coordinator Office of the National Coordinator for Health Information
Technology Department of Health and Human Services

Greenway Health Interoperability Pledge

Dr. DeSalvo and staff,

Greenway Health shares the principle that to achieve an open, connected care for our communities, we all have the responsibility to take action. To further these goals, we commit to the following principles to advance interoperability among health information systems enabling the free movement of data, which are foundational to the success of delivery system reform.

1. **Consumer access:** To help consumers easily and securely access their electronic health information, direct it to any desired location, learn how their information can be shared and used, and be assured that this information will be effectively and safely used to benefit their health and that of their community.

2. **No Blocking/Transparency**: To help providers share individuals' health information for care with other providers and their patients, whenever permitted by law, and not block electronic health information (defined as knowingly and unreasonably interfering with information sharing).

3. **Standards**: Implement federally recognized, national interoperability standards, policies, guidance, and practices for electronic health information, and adopt best practices including those related to privacy and security.

To demonstrate our commitment to these principles we have:

1. Since 2003, customers have been utilizing Greenway Exchange for critical data exchange transactions between their practice and other entities. Greenway continues to develop and grow our centralized cloud exchange engine, which utilizes national federally-recognized interoperability standards-based technology. It enables us to offer clinical connections affordably, and empowers healthcare organizations to scale their connections without relying on expensive point-to-point development.

2. Offered CommonWell services to our Prime Suite customers at no additional cost. The CommonWell Health Alliance supports a national data sharing network that

seeks to make clinical connectivity affordable and part of provider organizations' native workflows. Today, provider organizations in all 50 states are sharing clinical data using CommonWell's services.

3. Since January 2015, we have facilitated information exchange on the eHealth Exchange between leading groups such as Kaiser and Premise Health, which manages Intel's worksite healthcare clinics, and Providence Health & Services. The eHealth Exchange is a national data sharing network maintained by Project Sequoia – a partnership of federal, private and state stakeholders dedicated to reducing barriers to interoperability.

4. Became a founding member of Car*e*quality – an initiative supported by Project Sequoia, which seeks to facilitate agreement among diverse stakeholders to create a common interoperability framework. Its goal is to connect networks to networks, enabling members to connect disparate systems seamlessly.

5. Introduced the Greenway Application Program Interface (GAPI), an open API that allows other HIT vendors to quickly and affordably integrate with our multiple EHRs and give providers choice on how to enhance their organization's IT infrastructure. To date, over 100 solutions are on our Marketplace – including services for patient engagement, telehealth, care coordination, population health, front-desk solutions, and more.

6. Consistently participate in Connectathon to ensure our research & development teams have the opportunity to test and improve interfaces with other HIT vendors. Connectathon is the world's largest testing event that allows us to forge partnerships with other vendors to make clinical connectivity a reality.

We pledge to continue supporting nationwide interoperability by:

1. Supporting the development of FHIR, an initiative that seeks to standardize the exchange of clinical data through development based on the latest web-standards, and introduce more uniform implementation processes. This framework will also increase the use of clinical data in analytics, foundational to improving population health

2. Evolving the clinical workflows in our EHRs to maximize the efficiency and ease-of-use when consuming data from external systems as well as when providing clinical data to other systems and care settings

3. Providing cost-effective & usable solutions to customers that will allow them to meet regulatory, policy and clinical interoperability needs

4. Continuing to collaborate and partner with provider organizations, vendors and other stakeholders to bring clinical connectivity to patients and providers at the point of care

5. Delivering CommonWell services to our EHR customers at no additional cost and continuing to partner with the CommonWell Health Alliance to make clinical data exchange more actionable and meaningful so providers have what they need, when they need it

6. Continuing to demonstrate leadership through involvement with major public and private initiatives like Car*e*quality, Project Sequoia, the Surescripts National Locator Network and other opportunities

Sincerely,

Tee Green

CEO

Greenway Health