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Karen B. DeSalvo, MD, MPH, M.Sc.
Acting Assistant Secretary for Health
National Coordinator for Health IT
US Department of Health and Human Services
200 Independence Avenue S.W.
Suite 729-D
Washington, D.C. 20201

Dear Dr. DeSalvo:

Re: Orion Health Office of the National Coordinator (ONC) Interoperability Pledge

We at Orion Health Inc. believe that the health industry currently sits on the cusp of the next revolutionary shift, created by the proliferation of healthcare data and the application of IT to that data. In our view, open interoperability between systems is key to this health revolution, and Orion Health fully supports the ONC Interoperability Pledge and its three core commitments of:

- **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.
 - Consumers are a key participant in healthcare. They are increasingly demanding access to, and control over their data, and health data is no exception. Orion Health's Engage solutions satisfy the consumerization of healthcare by placing individuals at the center of their health and wellness management. In addition, our new Amadeus platform enables the processing and storage of data from consumer devices and unlocks the significant potential of remote patient monitoring initiatives.
- **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).
 - Interoperability is a foundational principle for Orion Health as we seek to aggregate, transform, present and share health information. We do not support information blocking. We believe that having the most complete, up-to-date information on a patient – even across competing organizations – is crucial for a patient's safety and optimum health care. Patients must be at the center of the healthcare ecosystem.
- **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.

- As a specialist in health IT integration, all of Orion Health's software is designed to interact and integrate with systems built by other vendors, as part of a wider integrated clinical information system. We use recognized standards for messaging data, networking, security and authentication, code sets and nomenclatures.

Below are examples of how Orion Health's products illustrate the dedication and commitment we have towards interoperability:

- Orion Health's Rhapsody Integration Engine and Patient Portal are both Meaningful Use-certified technologies that support federally mandated interoperability standards and practices.
- Our privacy solutions are configurable to provide the proper access to data based on the user's role and sensitivity of the data.
- Orion Health is closely involved with the development of the HL7 FHIR standard. We are implementing FHIR-compliant REST APIs throughout our solution, and have begun work to test SMART on FHIR.
- The Orion Health solution is implemented in over 30 countries, so it has a proven high degree of flexibility to meet governmental or regulatory changes.
- Orion Health is a founding member of The Sequoia Project, which seeks to facilitate agreement among diverse stakeholders to create a common interoperability framework.
- Orion Health solutions have been tested at IHE Connectathons around the world in cooperation with other HIT vendors.
- Orion Health is a member of DirectTrust, and has achieved full accreditation with the Direct Trusted Agent Accreditation Program (DTAAP) for Health Information Systems Program (HISP) from DirectTrust and the Electronic Healthcare Network Accreditation Commission (EHNAC).
- Orion Health Rhapsody Integration Engine manages the interfaces between data suppliers and data users within the platform. Rhapsody supports the latest healthcare standards, including Health Level 7 (HL7).
- Orion Health's eHealth Exchange Gateway enables access for bidirectional exchange of patient information between provider networks, federal organizations and other healthcare institutions in a secure, auditable and certified way.

Our award-winning health-specific software provides an open platform that seamlessly integrates local, regional, and national data, making it more readily available to doctors, nurses, specialists and patients themselves.

We are building thinking software for life – a suite of applications built on new generation technology, that will give everyone healthier, happier and longer lives.

Kind regards,

[signed]

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