Transcript

HEALTH INFORMATION TECHNOLOGY ADVISORY COMMITTEE (HITAC) e-PRIOR AUTHORIZATION REQUEST FOR INFORMATION TASK FORCE 2022

March 3, 2022, 10:00 a.m. – 11:30 a.m. ET
VIRTUAL
## Speakers

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Call to Order/Roll Call (00:00:00)

Michael Berry
Good morning everyone. I am Mike Berry with ONC, and I would like to thank you for joining the Electronic Prior Authorization RFI Task Force. We are always happy to have you join us, and your feedback is welcome during the meeting, which can be typed in the chat feature or can be made verbally during the public comment period that is scheduled at about 11:20 Eastern Time this morning. I am going to begin with a roll call of our task force members. So, when I call your name, please indicate that you are here. I will start with the co-chairs. Sheryl Turney? Sheryl is having an audio problem?

Sheryl Turney
Good morning.

Michael Berry
Oh, there are you are.

Sheryl Turney
Good morning. I got it.

Michael Berry
Great. Tammy Banks?

Tammy Banks
Good morning, everybody.

Michael Berry
Hans Buitendijk?

Hans Buitendijk
Good morning.

Michael Berry
Dave DeGandi?

Dave DeGandi
Good morning.

Michael Berry
Raj Godavarthi?

Raj Godavarthi
Good morning.

Michael Berry
Jim Jirjis?
Jim Jirjis
Good morning.

Michael Berry
Rich Landen?

Rich Landen
Good morning.

Michael Berry
Heather McComas?

Heather McComas
Good morning.

Michael Berry
Patrick Murta?

Patrick Murta
Good morning.

Michael Berry
Eliel Oliveira?

Eliel Oliveira
Good morning.

Michael Berry
And, Debra Strickland?

Debra Strickland
Good morning.

Michael Berry
Good morning, everyone and thank you. And now, please join me in welcoming Sheryl Turney and Tammy Banks for their opening remarks.

Welcome Remarks, Review of Plan (00:01:23)

Sheryl Turney
Thank you so much, Michael. We have a very big meeting today because we are trying to wrap up all of the input and the documentation as well as the recommendations that have been made. So, Tammy will lead us through that work in a few moments. Then, we have the opportunity again for public comment and we will discuss if there is any homework. I know that 1.) I want to thank everyone for their input on the Google Doc. We got a lot of input. We got a lot of robust conversation. I want to thank Hans for the
presentation that he did last week. I think that was very helpful to all of us to provide that structure, to look at the capabilities across the workflow, and help us determine and better assess where we are in terms of maturity as well as certification-ready requirements.

So, thank you everybody for your input on those documents and our recommendations. The hope is that as a result of our meeting today, we will be able to put our final recommendations and our responses to the RFI questions into a document as well as a presentation. We will review, hopefully, the focus of that on our Monday meeting, which we are going to have. I just want to remind everybody even before we get to homework that our meeting next week is on Monday morning at the similar time, 10:00 a.m. Eastern time. With that, I will turn it over to Tammy for any opening remarks and go to the working documents. Thank you all very much.

Working Document Review and Discussion (00:03:18)

Tammy Banks
Thank you, Sheryl. I am trying to get the screen share, if you could allow me to do that. What I am hopeful today is: I pulled the recommendations as best I could for certain topics, and I want to go through those and make sure we are in agreement with how those recommendations are laid out. I really do not want to spend a whole lot of time wordsmithing, but I want to make sure the content is there and the key elements that we need for just laying out the recommendations. The document will be open, so if there is wordsmithing, again, if we can keep doing that behind the scenes. I just want to thank the majority of you who have been going back and forth on several of these points. So, you will see they have been incorporated, and I will continue to look at that Google Doc to inform as we drop this into the report.

All right, it still did not work. Just a second. Okay. The first place I want to start is with standards and regulations. I know we did not talk about this a whole lot, but I did pull five recommendations in regard to this. I want to make sure that, again, we are all on board with what I have written here or provide me your feedback. I am not going to read this, but is this large enough so you guys can read it?

Sheryl Turney
Yes, it is readable, Tammy.

Tammy Banks
Okay. If you guys can take a minute and read it, and if there are any concerns or any comments, please let me know. Silence is acceptance, so please be vocal today.

Hans Buitendijk
Sheryl, may I make a comment there?

Sheryl Turney
Yes.

Hans Buitendijk
On the OIG guidance, I would suggest that rather than stating through EMR or other HIT vendor, just to state through HIT vendor.

Tammy Banks
I am sorry, Hans. I know you made those changes, and I did not catch that. Thank you.

**Patrick Murta**
So, Tammy, it is Patrick. On bullet two, certifications support the complete PA workflow. Is that where we officially landed as opposed to the individual components in an overall certification?

**Hans Buitendijk**
Is it still [inaudible] [00:06:30] whether this certification could be in multiple parts?

**Tammy Banks**
This is a really good question, Patrick. This was the recommendation we had for the standards, and the main point was the harmonization of ONC and HIPPAA. So, I think you are right. We need to rephrase it. Either the end goal is the certification would support the complete PA workflow, right? But we are looking at an integrated step. So, what if I go to the end goal?

**Jim Jirjis**
Would one recommendation be that certification ought to have the end goal in mind while early versions may certify a portion? Is that what we are saying here? For example, one early thing might be: Does this patient need a prior authorization, and if so, what data do they need? Right? But in the end, we want it to be far more than that.

**Tammy Banks**
Okay. So, help me here. So, the certification should have the end goal of supporting the complete PA workflow even though...

**Patrick Murta**
However, the individual components can be certified as well to support incremental delivery.

**Dave DeGandi**
Individual [inaudible] [00:07:57] guides, maybe?

**Patrick Murta**
That is what I am thinking about, Dave. Somebody said no?

**Tammy Banks**
You used the right word for this, what was it? It was not functional criteria. It was over the individual –

**Rajesh Godavarthi**
Implication guides?

**Tammy Banks**
No, because we are talking about functional criteria within the implementation guides.

**Patrick Murta**
Call them components.
Sheryl Turney
Individual components. That is it. And then, he wants you to add certification program at the beginning.

Tammy Banks
Okay, let us get Patrick’s things in here, and then we will go back. However, the individual components can be –

Patrick Murta
Certified and implemented incrementally.

Jim Jirjis
What we want to make sure, I mean, [inaudible] [00:08:41] would be that we land at a place where people can forever just pick a portion of it.

Hans Buitendijk
Should independently be in there somewhere?

Tammy Banks
Patrick, I am getting confused here. Just a second. So, certified and implemented –

Patrick Murta
Incrementally.

Tammy Banks
Oh gosh, I need more coffee. Sorry. And then, the certification program. Okay, I am with you guys now. Now, go back to the conversation.

Jim Jirjis
The only problem I have is we want to make sure we land in a place where, though we celebrate incrementalism initially, we do not land in a place where vendors or providers can simply stop with a portion of it. We want to land in a place for the entire workflow is...

Tammy Banks
Okay, we are going to get there. This section is targeted to the standards and regulations. So, the really big point is: As the certification is rolled out, that both ONC and HIPAA regulations have to be able to update and change independently. That is the key thing of that bullet. What we have right now is the 278 is a mandated standard. So, in order to exchange that prior authorization, you have to convert the FHIR to 278, and then convert it back to however the end-user wants it.

So, what these five bullets are basically saying is: You can have two different standards, named standards, in use, and that also we need to make sure that the exception approval process is going to be less burdensome, right? More like a submit it, and then it would automatically be approved. So, you do not have to use that 278 if you are doing this da Vinci end-to-end workflow within the HIT and have that extra burden of that investment. Again, I am saying a named standard, not any standard out in the universe. And so, that
is kind of what those three middle bullets are about, how we have really got to rethink HIPAA, and we cannot have just one standard when we have two different business uses here. One is coming through the revenue cycle with the 278 and potentially a CCDA attachment, which is currently inflight today, and moving toward in the HIT vendor work floor, which then would be using the da Vinci functional standards and criteria.

So, my long-winded statement was to say that this is the key thing of that sentence for the standard and regulation changes or considerations, in order to even make this work and be efficient.

**Rajesh Godavarthi**
Tammy, I think two people have raised hands.

**Tammy Banks**
Oh, I am sorry. Hans?

**Hans Buitendijk**
Yeah. Perhaps to further allow for that is that after the complete PA workflow, indicate across one or more provider and payer HIT because I think the challenge here is that we recognize that there is multiple HIT on both sides in play, and we need to make it work across all of them.

**Patrick Murta**
Does it not imply that though?

**Hans Buitendijk**
Based on some of the statements made, it is not interpreted that way.

**Tammy Banks**
Or we go across all stakeholder vendor systems, right? Or systems.

**Hans Buitendijk**
I am still hearing at the times that the implication would be that the singular HIT, in the end, not necessarily initially and incrementally, but in the end, would do everything. I think that is not necessarily accurate even for long-term. It is still multiple HITs at play.

**Tammy Banks**
Okay. Does anybody have any issues with that change? Silence is accepted. Okay, Rich?

**Rich Landen**
I think overall, all five bullets are pretty strong and clear, and I am happy to see this in here. My one concern is in the first bullet. At the end of the second sentence, we have the term "on the preference of the payor." While technically, I think that is okay, I am a little worried about the language in terms of unintended consequences and would suggest we just put the period either after either "FHIR" or "X12-based," taking out the language preference of the payer. Obviously, in the context here, we are talking about intermediaries acting on behalf of the payor. So, it is redundant. I fear a little bit that if we leave in the language, "on the
preference of payer,” that might bias other actions to say, “Well, the task force said that the payer should determine what the arrangement is, not the provider.”

So, I would rather stay silent on that rather be on record with something that can be misinterpreted fairly easily.

**Sheryl Turney**
Yeah, I agree with that, Tammy. I would agree with that change.

**Tammy Banks**
Does anybody disagree?

**Dave DeGandi**
I think this is talking about – behind the intermediary, the provider talks directly to the intermediary using FHIR. Then, behind the scenes, the intermediary can talk to the payer using X12 or FHIR. So, that X12 or FHIR question is not exposed to the provider. It is only exposed to the payor.

**Rich Landen**
Understood, but I am still worried about it being taken out of context. The first sentence says, “An intermediary acting on behalf of the payer,” which makes it real clear what you just described.

**Tammy Banks**
What do you think if I move it out of the standards and regulatory section and drop it into the actual phased and approach? So then, it is more into the how-to than the standard and regulation.

**Sheryl Turney**
Yeah.

**Tammy Banks**
I do not know why it belonged in here, but for some reason it did yesterday. Okay, any other questions or concerns? Does this clearly state the intentions that we have previously discussed or the comments that have been in the Google Doc? Okay, silence is golden.

Okay, the other one I wanted to go through is attachments. I know that there were some comments going back and forth: What it is exactly that we are trying to say with attachments? Here are three bullets that I pulled out to try and convey what we were saying. So, please read them, and let us have a conversation.

**Sheryl Turney**
I think Hans has a question, Tammy.

**Tammy Banks**
Oh, I am sorry. Hans?
Second bullet, I am not sure whether – I think I understand the overall intent, but I am not sure whether I follow the first sentence into the next, where it states, “PA FHIR attachment process.” I am having a hard time following the intent, because I think where it is CCA documents or FHIR documents as attachments, I think we have the same question that we talked about that it need not be a document. So, maybe it is the PA FHIR attachment, or is it the PA as FHIR data set approach that you are trying to indicate in that second statement? Currently, it says PA FHIR attachment.

Tammy Banks
Yeah. So, semantics. So, should it be like artifact, PA FHIR artifact process?

Hans Buitendijk
Is that PAS?

Tammy Banks
This is what was written in the Google Doc. I just pulled it up.

Sheryl Turney
The PAS is just Prior Authorization Support implementation guide. That is the name of it; that is all.

Hans Buitendijk
I think the PA there in front of FHIR is meant to be PAS. I am sorry. I am not looking there. I am looking at the second bullet, second bullet at the end.

Tammy Banks
Okay. Well, I was just going to put this, so that –

Rajesh Godvarthi
I think in the second bullet, the first line is good enough.

Hans Buitendijk
After that first sentence, there is a second sentence that says, “PA FHIR attachments.”

Rajesh Godvarthi
We can end with the whole second sentence, actually. If you look at the first sentence, you can miss the point.

Hans Buitendijk
In that case, perhaps… I agree with Rajesh. That statement there, “PA FHIR attachment process that is;” is not needed.

Rajesh Godvarthi
Yeah, exactly.

Tammy Banks
So, this modifies that?
Rajesh Godvarthi
If you keep just the first line, I do not think we need the second line and the bullet points.

Hans Buitendijk
Yeah. The sub-bullets, you still need. They are helpful. It is just where your cursor is now. There you go. To the left and remove that line. Yes. Then, I think it still works, and I agree with Raj.

Tammy Banks
Then, you say that is, and then…okay. Any challenges to that or additional clarification needed?

Hans Buitendijk
Do we want to add, “or FHIR documents, because either one can be included. They need not be CCA; they can be FHIR documents.

Tammy Banks
Okay, where would you put that change verbiage?

Hans Buitendijk
Second bullet, main bullet. CCDA or FHIR documents. We really do not care.

Tammy Banks
Okay. Are there any other points that we made on attachments that I did not catch? And I stuck this toward just ePA.

Rajesh Godvarthi
This looks good.

Tammy Banks
Okay.

Sheryl Turney
No hands raised.

Tammy Banks
All right, silence is golden. I know you guys are all vocal because I have seen all of your comments and appreciate it.

Okay, now, the prior authorization roadmap to FHIR. I laid it out, and I took that attachment piece out because we had said that the attachment would need to be a separate criterion. So, that is why it is not in here. If you guys could review this and see if I caught the main points, recognizing I know that we have had more specifics that we are still going back and forth on in the Google Doc and also, we have a functional spreadsheet as supporting recommendations. We will make a caveat around those that those are just for directional purposes, so we will not submit that those requirements are the requirements, but we want to
give directional requirements. So, that is a caveat that will be made, but this is just the overall vision. Does this capture overall what we were talking about?

So, I will go through. I know that this is a long piece, so let me... I will start with the first bullet. I am just going to have you read the whole section first because it all kind of goes together. Okay?

**Rajesh Godvarthi**
Tammy, can you make the “document to data approach” as “document-driven to data-driven approach” on the second line?

**Tammy Banks**
Second line, move from “a document-driven to data approach.”

**Rajesh Godvarthi**
To data-driven approach. Basically, we are saying – yeah, that is good.

**Tammy Banks**
Okay. I think that is clarity, unless anybody else has any other. I am going to go to the second bullet. We can come back; I just want to make sure you read that.

**Sheryl Turney**
Tammy, we might want, for the metrics that we include there, just to say, for example... Because I imagine that the metrics would want to include what are the percentage of prior authorizations that you can complete electronically.

**Tammy Banks**
Right here, you mean? For example?

**Sheryl Turney**
Yeah, because it is not an exhaustive or complete list.

**Tammy Banks**
Perfect. Okay. Here, this is –

**Patrick Murta**
Tammy?

**Tammy Banks**
Yes, sir?

**Patrick Murta**
Can we make...and Raj, feel free to comment. It is documented data-driven, but it is also document to event and data-driven. So, things are happening based upon triggers as opposed to human or manual interactions. So, I would propose that it is a document-driven to an event and event-driven and data-driven approach. Is that reasonable?
Rajesh Godvarthi
I think you can say "comma, data-driven."

Patrick Murta
Yeah, but you agree with what I am saying?

Rajesh Godvarthi
Yeah, I see your point because [inaudible] [00:22:37] can be triggered at any event.

Tammy Banks
Help me with what I missed here. Data-driven to an event.

Patrick Murta
You got it; you are done.

Tammy Banks
Really? Okay.

Patrick Murta
You are brilliant, Tammy.

Tammy Banks
I will take it this morning.

Rich Landen
You may want to look at that again on the editing because Tammy, I think it is a rough read. Just the comma after event.

Sheryl Turney
I agree; it looks like something is missing.

Tammy Banks
Move from a document-driven to an event –

Patrick Murta
Event-based, data-driven approach?

Rajesh Godvarthi
Or event-based and data-driven.

Tammy Banks
Is that “and/or”? Well, are we not going data –

Hans Buitendijk
Both. It is event- and data-driven

**Sheryl Turney**
I think after, "driven," it needs to say, "approach." Yeah, there you go. Now, it reads better.

**Patrick Murta**
It cannot say "and/or" it has got to just say "and."

**Rajesh Godvarthi**
Agreed.

**Tammy Banks**
I guess I am not brilliant anymore.

**Patrick Murta**
No, you redeemed yourself. You are good. It is an and, not or. And.

**Tammy Banks**
I like to be inclusive.

**Sheryl Turney**
Well, you cannot. So, Hans had his hand up on this part. So, Hans, go ahead.

**Hans Buitendijk**
I went to the second main bullet and the second sub-bullet, but I can wait if you want to.

**Tammy Banks**
Are you on the first bullet or second bullet?

**Heather McComas**
I am in the first sub-bullet of the first one. And actually, I thought that Sheryl’s point was really good. That additional metric of the percentage of PAs that can be completed electronically, and I would like to add that as an example because I think it is so important.

**Tammy Banks**
Percentage of PAs… What was it?

**Sheryl Turney**
That can be completed electronically.

**Hans Buitendijk**
Electronically or automatically?

**Sheryl Turney**
Automatically, I guess. I do not know. Since we are talking about it in electronic terms –
**Tammy Banks**
How about digitally?

**Sheryl Turney**
Yeah, digitally. Let us go with digitally.

**Hans Buitendijk**
The reason why I used the term automatically for a moment is because at least for a large percentage, the da Vinci approach is to enable that at some point in time, a larger percentage does not require human intervention to gather the data, get the data, other than the initiation of it, and then go. Electronically, it still would involve a human intervention. So, that is the difference that I am making between the two. [Inaudible] [00:25:28] them out.

**Sheryl Turney**
I think that is a good goal, but I do not know that initially, you can go there, Hans.

**Hans Buitendijk**
Absolutely. I was just wondering whether we wanted to understand that progression as well because that is going to save a lot of time too.

**Tammy Banks**
Are we happy with as is, or change it to "automatically?"

**Sheryl Turney**
No, I like the qualification because you did put it as an example.

**Hans Buitendijk**
Can you change the i.e., to e.g.? Sorry.

**Tammy Banks**
Oh, my grammar Nazis.

**Hans Buitendijk**
Sorry.

**Tammy Banks**
No, that is good. I am teasing. David?

**Dave DeGandi**
Yes. Where it says, "Completed visually," it should say that the determination has been made versus completed. The determination is the final state of the prior authorization.

**Tammy Banks**
Made digitally? Are we not just saying that it is all finished? I mean...
Rajesh Godvarthi
I think we can wordsmith that.

Tammy Banks
Yeah, can we do this via Google Docs? It is a good point. I do not mean that it was not. It is just that we have got a lot here. Okay, here is... Oh, Eliel, did you...

Eliel Oliveira
Yeah, I do not know if we really wanted to add this here, the specifics, but I do believe it is quite important that whoever does the evaluation is not the folks that are doing implementation. In the evaluation, I mean on cost savings and any ROI. So, those should be distinct groups, in my opinion.

Tammy Banks
What change would you recommend?

Eliel Oliveira
No recommendation, maybe an addition that the evaluation of ROI should be done by a different group.

Heather McComas
Maybe adding something about independent review and analysis or something. That is a really good point.

Tammy Banks
Okay, I will wordsmith this and put it in the Google Doc so that we can continue to wordsmith it. I think we got the main content, right? Hans, can we move on to the second bullet, or do we have more here?

Hans Buitendijk
My comment is about the second bullet, second indent.

Tammy Banks
Thank you. All right, what do you have?

Hans Buitendijk
The second indent states, "[inaudible] [00:28:09] certification for data only requires initially," at the end. I think that is the same comment as the other one. At the end, it says initially. That would imply that somebody might believe that one [inaudible] [00:28:21] is going to do everything. At least the word initially should be removed. I am still trying to figure out how to better phrase it or just copy roughly what we had in the other discussion.

Rajesh Godvarthi
It is in the next page. We talked about this.

Tammy Banks
Should I change this and put the wording in here? I can drop that whole paragraph right in here.
Hans Buitendijk
You could do that or maybe that is off-line, just making sure. But it is trying to make sure that the interpretation of initially, however it is used, is not implying that in the end everything is a singular HIT.

Tammy Banks
Okay. I will drop that thing up here, and then we can wordsmith it if you choose. I should just be able to do that.

Rajesh Godavarthi
So, I adding the [inaudible] [00:29:15], what is the border of those operating rules? When we are reading the first bullet, it includes the CAQH core timeline.

Tammy Banks
Yeah. The group had asked that we investigate as additional review to put in timelines around the certification that are in the CAQH core operating rules. Now, I did not lay out the specific rules, which I will cite it right to the PA. Does the group still agree?

Rajesh Godavarthi
That is good.

Tammy Banks
Okay, sorry about that. I ran out of time.

Hans Buitendijk
Are the CAQH core timelines operating rules – are they applicable to a FHIR-based environment, or are they based on an X12 set of interaction laws?

Tammy Banks
Is going to be X12, but it is going to be a response within five seconds, 10 seconds, something like that. So, FHIR should be a lot faster, but the point is it has to happen, right?

Hans Buitendijk
Yeah, it depends on which interaction we are talking about. The five seconds might be too long because the change of interaction paradigm.

Tammy Banks
Hans, we will get you the rule, and you can take a look at it. We can revisit this via Google Docs, okay? And if you have an aversion, then we will bring it back for the conversation on Monday.

Hans Buitendijk
I would be generally cautious that the –

Tammy Banks
No, you look at it and check it out. That is kind of what the group recommended, but we do need review if anyone is concerned. We need to be specific. And I think what you are saying is that we should not say includes. We need considers, right? Or reviews or a different, less –

**Hans Buitendijk**
We will work with CAQH core to align. Then, it can address whatever the variances are that it needs to address.

**Tammy Banks**
We will play with that. Just everyone know this is on the parking lot in the Google Doc. Okay? Rich?

**Rich Landen**
Tammy, I am unclear on what kind of a timeline we are talking about. The subject of the main bullet and sub-bullet are talking about an iterative approach, but my understanding of timeline is we are really talking about response timelines after information has been sent.

**Tammy Banks**
I will put what the actual rule is and cite it. I just knew it was timeliness of response, but I do not know exactly what. So, I will drop in the right rule.

**Rich Landen**
Yes. So, it is the timeliness of responses rather than the timing of phases of certification based on maturity.

**Tammy Banks**
It is purely response times.

**Rich Landen**
Okay. Maybe that needs a separate bullet then.

**Tammy Banks**
Yeah. I forget who had recommended that. And I believe it was in the EPA, the prior authorization rule that was pulled back. These rules were included in that. So, I can pull them from there as well. So, good point. Sorry for the lack of clarity. Anybody have any other, anything they disagree with or any additions to add clarity to this piece? Okay.

**Hans Buitendijk**
Maybe one question, and that is the last sub-bullet that states, “Includes uniformity, etc.” Was there any particular uniformity with future regulations? What are we trying to achieve? I am not sure whether it is clear.

**Tammy Banks**
What was in there – and I took it off because there was a comment made about not referring to the TEFCA and other regulations here – but this was in regards to TEFCA, Cures, any regulation that is out there today and tomorrow to make sure that this certification falls in line with the timelines as well. Right? Because we have to move together as an industry.
Hans Buitendijk
Do we want to say, "Remains consistent with current and future?" Because it is an ongoing –

Tammy Banks
Okay, start it with remains consistent?

Hans Buitendijk
Yeah, because I think if I hear you correctly, what we are trying to say that as other regulations and voluntary TEFCA programs and whatever – as they unfold, to maintain consistency with that.

Tammy Banks
Like this right here, “Remain consistent with current and future regulation requirements.”?

Hans Buitendijk
Yeah. If you drop that, would that work better?

Tammy Banks
Now, do we want to say something with timeframes or timelines, or do you think it is all inferred that this would all be married together?

Hans Buitendijk
It sounds like this is ongoing. TEF is rolling out, new regulations come up. It needs to not conflict with that over time.

Tammy Banks
Well, and the timelines need to be consistent too, right? We were talking about payer. The payer has to be able to send the information while the provider bills it. We are in the building phase, but when we get to that mature state, we have got to be able to exchange it.

Hans Buitendijk
Maybe then the word instead of remains it is maintains consistency with current...

Tammy Banks
I like that, does anyone have a better word or...?

Hans Buitendijk
I think you still have to have the consistency after the word maintains.

Tammy Banks
Okay. Are we happy? I do not see smiles. Come on folks, are we happy? Now, this is the one I thought we would actually debate.

Heather McComas
Hey Tammy, sorry. I just saw in the chat that Alex had a good suggestion. I was actually [inaudible] [00:35:44]. What do we think about instead of consistency, alignment? That seems like a good word.

Hans Buitendijk
That works.

Tammy Banks
Just alignment or get rid of consistency?

Rajesh Godavarthi
I think alignment is good.

Tammy Banks
Excellent. Okay. Thank you for catching that. Thank you, Alex.

Okay, this right here is something we have not talked about on the call. We have been talking via Google Docs. How to manage a rollout? So, please read the bullets, recognizing this is new with some additional comments on how to grapple with this rollout of PA across all the different provider settings.

Sheryl Turney
I do not know if I would say, "No standards." You have, "No requirements rolled out until the standard has been tested." I guess I am not understanding what that would mean: no requirements rolled out. Because in order to facilitate the adoption and scalability, we really need the standards because what we have now is the Wild West with lots of proprietary stuff going on. So, I do not know if saying, "No requirements rolled out." I think maybe we need, "No certification enforcement" or something. It is not the requirements for the standards that we are saying need to be aligned over time. It is the how we are going to adopt those.

Maybe other – there are at least three hands up. So, we can maybe get one of them to help me with the wording here. What Tammy and I were thinking is that if we are setting out something that is more like an onramp, then how do we bring the various levels of provider maturity and EMR systems into that onramp? And it maybe could be through some sort of approach to phasing things in. But then, I am not sure what the target or goal should be in terms of certification requirements because obviously, the sooner we have a standard and then a certification of the HIT vendor to that standard, the level of adoption and the time to adopt, then everybody will need a window because not everybody has the resources, the dollars, the maturity to adopt it immediately. I will leave it with that. So, first hand is Patrick.

Patrick Murta
I was going to comment not specifically on what you said, Sheryl, but the way it is worded here reminds me of the big bang approach. I know it says iterative, but I also think that we need to advocate for and support the fact that these individual components can be rolled out incrementally. Right? We certainly want to get to the entire PA model, but that should not mean that we cannot roll out CRD, or DTR, or the individual components as they are ready, so that folks can start receiving value and proving prior authorization incrementally while we are building up to the larger: here is the full PA suite of capabilities that are in play.

Tammy Banks
What revisions would you suggest, Patrick, to make that?

**Patrick Murta**
I was actually thinking it was going to be a sub-bullet. Admittedly, Tammy, I had not completely mapped it out.

**Tammy Banks**
The question for you is: Does the above infer that for this section because that would be in place first? Do we need it here too?

**Patrick Murta**
I think both places is great.

**Tammy Banks**
Redundancy is not a problem.

**Patrick Murta**
Yeah, let us be redundant because it says, “Fully functional PA workflow.” And then, it goes into inpatient and stuff like that. I think implementation of… And you can certainly wordsmith it later during the Google Docs. The ability to roll out as implementation guides are thoroughly tested and ready for implementation.

**Tammy Banks**
Ability to roll out [inaudible] as they are ready.

**Sheryl Turney**
Yeah, I am going to ask a question as you who have your hands up. So, there are some vendors who are already talking about adopting the PAS implementation guide without CRD and DTR. I do not know how that would fully work, but to me that would be more burdensome for the provider because some parts would be implemented in others. Since I am not as familiar with the certified health IT program, to me would we want to make a statement about the fact that I do not know if you certify one part, how that really helps the overall problem if you cannot do all the parts?

**Patrick Murta**
Just really quick, Hans. Let me quickly respond to that, Sheryl. I would say that it is not saying that you have to roll them out incrementally, but if you can bring these to market, you should. Transparently, some of these are already in production and are showing enormous value. Not will all three. I do not know if anybody has all three in play, but some organizations, including mine, has at least one of these in play and building others, and they are recognizing tremendous value. Hans, sorry.

**Hans Buitendijk**
I was actually going to go the same path as Patrick, within the [inaudible] as well. For example, one approach, one alternative, can be – which shows you can do it in part, CRV and PAS are more straightforward interactions. When you look at DPR, there is a lot of workflow, data-gathering, other things that you need to do across the systems. It is more complex. So, you can already start to get value by doing
CRV, CRV plus PAS, and also with PAS. So, I think that in those stages, of the process, could be tackled on their own and as starting points. So, from that perspective, they can be used as examples there.

There is another part that always catches the question: How do we get the intent and incentive to actually move forward? Here, we are providing feedback on certification-focused RFI, but I think we need to look at the total spectrum and say, “What tools are in place to help move this forward as well?” And then, we actually need to look at the CMS rules as well and say that it is the combination of the two. What we have seen in the past is that there may be a functional requirement and a performance bonus on the CMS side, but not necessarily associated standards on the certification side.

There is also examples where, on the certification side, one side of the equation has a certification to a set of standards. The other side, interacting with it, not yet. So, that is a target that we know that some point is developing to the standard. The other ones that are trying to figure out how to interact with it are now able to use that are not certified to it. Yet, they are still going to conform to the standard, otherwise they cannot connect.

So, there are different flavors and tools. As long as we look at it between ONC and CMS, not just the certification program, that there opportunities to help create a glidepath and a roadmap that initially is not heavy on certification of the capabilities or maybe only for some but not all that can drive at least a core of standards to be out there. And then, in combination with CMS, get the right parties to say, “Hey, if I do this, I get bonus points.”

**Tammy Banks**

So Hans, are you suggesting any recommendation to this document or adding color to the comment?

**Hans Buitendijk**

I am not sure whether you want to wordsmith here or follow it up. If there is a general sense for that, it is to recommend to ONC to work with PNS, that they balanced out between the two parts that they look at the example that already is there, focus on particular stages, CIV, PAS, or etc. That should be okay. And that they also look at: What can CMS provide as incentives to either payers or providers to start take it on? But also look at where we want to encourage the use of the standards because agreed, we do not want to start with no standards. But how can you do that without certifications for all? Can you look at one side of the interactions more consistent and say, “If these already start, than the others that have more complexities can work their way through it.”

So, that is the direction that we are thinking of with a number of HER [inaudible] [00:46:07] around. We want to see what permutations do you have.

**Tammy Banks**

Okay. This needs to be wordsmith, Hans, but did I catch the content?

**Hans Buitendijk**

Yes, I think that can help them.

**Tammy Banks**
Yes, the content needs help. Does anybody on the call have concern or have other content that needs to be in there to drive that point?

**Eliel Oliveira**
I think a little bit of what I was going to say, Tammy –

**Tammy Banks**
Oh good, Eliel. Go ahead.

**Eliel Oliveira**
Last few comments actually related to this: in the first bullet, we say, "Iterative rollout plan that allows the adoption." I feel like we should maybe wordsmith that, saying that the development of the iterative rollout plan, including a market scan – which also, I think, relates to this bullet that Hans was suggesting. There is a lot of work in just putting together the plan, right? And seeing who is in what stage of development. And then, understanding and balancing out what EMS says or not. So, does that make sense?

**Tammy Banks**
Yeah, am I catching it here?

**Eliel Oliveira**
I think so; let me see.

**Tammy Banks**
Am I catching it?

**Eliel Oliveira**
Yes, I think so.

**Tammy Banks**
Good call. If I could just type right. Environmental scan. Okay. So, back to this bullet. Is anybody in disagreement with Hans continuing to wordsmith it?

Okay. I am hearing silence as acceptance. And then, I cannot imagine any of you guys will have any issues with Eliel's comment.

**Patrick Murta**
Market analysis and environmental scan.

**Tammy Banks**
Market readiness? That includes market readiness analysis? I think the point is just: Are we going to base this on the readiness of the criteria?

**Rajesh Godvarthi**
I think other statement already includes what we mean by [inaudible] [00:48:43] plan. I think we are writing more words here to qualify that. So, what other market readiness we would think other than [inaudible]
[00:48:56] period of time? So, we already said that in the second statement. The reason market analysis and environmental scan – we are using two different phrases.

Patrick Murta
To me, Raj, it is almost an out, right? If the implantation guides are ready to go, locked in, but people are not adopting them, does not mean that the market is not ready yet? I do not know.

Tammy Banks
Okay, I may be misinterpreting what you are saying here, but I think this is a really good point. This rollout plan, it needs to occur when the plan is being rolled out, right? So, you put in the criteria, the first phase of criteria, you are going to need to do a market analysis to see how that adoption is. Is it working? Is there another way to provide incentives or make sure that this – or enforcement? I mean, putting it in that context, would that be... Does anybody have any concern with that?

Patrick Murta
You are saying something like an informed and industry vetted rollout schedule? Is that what you are saying?

Sheryl Turney
Yes, I like that. Vetted.

Tammy Banks
Does that capture what you are trying to say?

Patrick Murta
It does for me. I am not sure about anybody else.

Tammy Banks
I do not know if we – yeah, I always go Ele or Eliel. So, I was nervous to say it because I really apologize. Eliel, would this be a compromise that would work?

Eliel Oliveira
Yeah, I think so. I think the idea is that you have to get everybody together: maybe the current vendors of the system, some of the payers, some key providers that wanted to collaborate to develop that plan together. So, that market analysis or maker readiness is kind of that getting everybody together.

Tammy Banks
So, do we want to say, "In collaboration with the stakeholders?"

Sheryl Turney
Yes, I think that is good. Also, Rajesh has his hand up, so he may have something to add to this conversation.

Rajesh Godvarthi
Yeah, I think on the second bullet and the second point… I think that whole second bullet, I have a feeling that we are getting prescriptive here. We could say – and I think Rich made a comment here – [inaudible] [00:51:53] an option until the standards have been tested. We could change the first standard, but the second line can be removed in my view because how do we know when it is ready? We need to be specific with that statement.

**Sheryl Turney**
You are suggesting we remove the second sentence?

**Rajesh Godvarthi**
Yes.

**Sheryl Turney**
I would be okay with that.

**Tammy Banks**
Does anybody have any comments?

**Hans Buitendijk**
Which second sentence? Can you highlight that? Yes, I am okay with removing that.

**Sheryl Turney**
Yeah, because that was an example anyway. So, we can remove that, Tammy.

**Tammy Banks**
Well, and I think it is being captured right here. Does anybody have any issues? Again, I just want to be respectful of comments.

**Heather McComas**
I understand it seems like an example. Would folks feel like adding, in parentheses, “This is an example of what we are talking about.”? Just being clear? I get your point that this is kind of a subset of the statement before, but this is an example of what we are talking about.

**Tammy Banks**
Does anybody else have any concerns?

**Rajesh Godvarthi**
My worry is that it is very prescriptive and one can interpret that: We are targeting that message for certain emulatory practices. We can probably generalize the example better.

**Tammy Banks**
Well, we can e.g. the practice setting, right? And then, it would parallel.

**Sheryl Turney**
Emulatory practices.
Rajesh Godvarthi
Emulatory, yeah.

Sheryl Turney
There you go.

Rajesh Godvarthi
Are you okay with that, Heather?

Tammy Banks
Heather, does that work for you? Okay. All right. Anything else on these bullets? Recognizing Hans, I love assigning people. Hans is going to wordsmith this for us.

Rajesh Godvarthi
I think the third bullet, maybe Patrick and Hans could rewrite CRV DTR as well. I do not remember the description that we had before. I still believe that anybody can certify anything.

Hans Buitendijk
It was meant to be an example of a combination of CRV and PAS. You still continue with DTR, or you are already moving with that.

Rajesh Godvarthi
You are right. So, we can add that in then.

Tammy Banks
Are we happy with this, with the caveat, “And related.”?

Rajesh Godvarthi
Yes.

Patrick Murta
Yes, that is good.

Tammy Banks
Okay, last call, folks. Any other comments on this section? You guys are rocking it. Okay, I forget now what I had left. I did not think I would get this far. Oh, I know what I wanted to do next. Sorry for the eyestrain here. We did standards.

The other one that we did not talk about is a governance. And something that was bounced around was creating a burden reduction subcommittee similar to – is it the ISA? What are your thoughts on this? Should this be included? Should it not be included? Should the content be changed?

Hans Buitendijk
When you say similar to ISA, do you mean the Interoperability Standards Advisory?
**Hans Buitendijk**
There have been thoughts tossed around. On the one hand, there is the da Vinci Group that is progressing and has participated in these guides. But that may be one subset of stakeholders. So, the notion of “burden reduction subcommittee,” I am not sure what the right term is, but we have been talking about some other notion of [inaudible] event, or something to help understand where we are at and how we are moving. So, something along these lines, I think would be very helpful because if we say do not do it until something is ready, how do we determine it is ready?

But I am not sure whether that is a committee, or whether that is a process, how to do that. I am not convinced that the ISA, which is currently really a library with a general assessment of where things are at – whether that is sufficient to be the trigger to say that it reached four out of the five bullets on the rating. We are ready. I think there is a little bit more to it than that. I like the overall idea.

**Tammy Banks**
So, you are thinking it is more important to list what this group should be focused on than actually listing it the way it is?

**Hans Buitendijk**
That would be my suggestion.

**Tammy Banks**
Okay, and we will come back to specifics. Rich?

**Rich Landen**
I am really fuzzy on a couple of terms here. "Governance?" What exactly are we governing? And the second concern is the burden reduction subcommittee. A subcommittee of what? So, I am not sure where all of this is fitting in. Are we talking about something under the auspices of ONC, or are we talking more something industrywide?

**Tammy Banks**
What would be your recommendation?

**Sheryl Turney**
Where it came from, Rich, just so you know, was when Tammy and I were discussing about this, about do we need to have another subcommittee under HITAC that will look at the bigger problem if and when a rule comes out. And so, obviously, we need to wordsmith this, but that was the original discussion.

**Rich Landen**
Okay. I will need to think about that.

**Rajesh Godavarthi**
So, I think I agree with the intent here. I think we need to figure out the right words. The maturity and adoption should be the key. [inaudible] [00:58:28] as long as the committee [inaudible] [00:58:34] maturity and adoption, and then enhances the certification requirements over the period of time. That should be the oversight groups under ONC.

Tammy Banks
So, keeping it a little bit more general?

Rajesh Godavarthi
Sure.

Tammy Banks
Was this kind of where the people that had previous comments – create an oversight process with the MPR that examines? Heather?

Heather McComas
Yeah, I agree. I am not sure the exact word. Maybe governance is not right, but I feel like there is an operational oversight group needed for all the things we have just been talking about this morning. We were talking about that there was going to be testing and to Eliel’s point, kind of one independent angle on that. So, the data have been kind of independently reviewed. And then, looking at each practice setting for each service, evaluating the viability, and then ready to move on.

And so, in order for all this iterative approach, we need oversight of this whole iterative approach that we are talking about. Otherwise, how is it going to happen? There needs to be an ongoing group that is evaluating this over time. Say, “Okay, we are ready to roll out imaging, for example, in this practice setting.” Right? And how are we going to do that unless there is some kind of structure? It is just going to be stuck, right? It will be just kind of let to languish, which obviously none of us want to happen because this is so important.

Tammy Banks
Anybody add any additional language or – well, let us start with making this easy. Is anybody against adding a recommendation like this in our report?

Sheryl Turney
So, maybe we could wordsmith it to create a standard adoption process to provide…

Tammy Banks
Well, it is more than a standard adoption process because we are talking about the function of criteria and the iterative roadmap.

Sheryl Turney
Right.

Tammy Banks
And we would not be creating it, right? We would be monitoring it and advising?
Sheryl Turney
Right, but we have to remember what ONC’s role is. It may be there is another group that has another role, but ONC’s role, and I am not the expert on this. Maybe Alex or Michael can speak to it – but I do think that what we are really talking about is the adoption life cycle. And today, for the certification requirements, we have rolled USCI and others into the standards of process, and we created an adoption process for adopting those data elements, so we can have a maturity and a time requirement.

So, what we are talking about is really creating that standards adoption and oversight process, if you will. And I do not know if we can use the word oversight. It basically looks at how we adopt the maturity over time. That is really what we are talking about.

Hans Buitendijk
The comment I was going to make was that maybe it is establish a review and advisory process. I am not sure about oversight, whether that is the right term. This is just more [inaudible] [01:02:18]. To have insight and provide recommendations on when we are ready to [inaudible] [01:02:24].

Sheryl Turney
I like that. Review and advisory process. And Eli has his hand up.

Eliel Oliveira
Yeah, I was just going to suggest an analogy here, maybe help simplify it. It is like one day TEFCA worked in a determination of a recognized coordinating entity. I believe that is how they called the RC. It seems to be an interesting model, where folks that have the skillsets to build that plan then manage the rollout. And everything we are talking about could be a good fit. I do not know if ONC itself would be wanting or can manage this, but someone like the RC in that case with the Sequoia Project. Someone that is capable to take the lead to roll this out.

Tammy Banks
Good point. Does anyone else have any comments on this piece? Okay. I think that is all I had. This is all just straight from the Google Doc.

What do we have, 10 minutes?

Sheryl Turney
Yeah, we have about 14 minutes.

Tammy Banks
Okay. What I would love to do is create a caveat for the piece in the Google Docs that David dropped in. Let me find it. And address some of the issues that came up because I do not want to get to Hans because I know that is going to take more time. Shoot, what part were you in? Sorry, shut your eyes. I will tell you when I am there.

Dave DeGandi
1.3?
**Tammy Banks**
Okay, that is why. I am way onto 5. Where is my page up? I will tell you when I get there, and you can open your eyes. How is that? I think what we just have to do is put a caveat because we are not saying "This is it." This is just a guide to be thinking, right?

**Hans Buitendijk**
Tammy, if you are moving around you are not displaying your current window.

**Sheryl Turney**
We are back at the detailed recommendations page.

**Tammy Banks**
I take back my apologies because obviously, I was not hurting your eyes. Okay.

**Sheryl Turney**
There we go. Now it is coming.

**Tammy Banks**
Now, realize I did not address people's edits on this section. I know that there was one overarching concern. If we are going to be giving specific criteria like this recommendation for points of certification or the last column in Han’s document that has the recommendation, we want to have a qualifier that we are not saying, “This is it.” It is just a guide. So, is there any specific language that would make sense when we put these in as just an example in the report that would make everybody comfortable? I have not thought about this, so I have nothing for you to react to. Sorry.

**Dave DeGandi**
Before points of certification, say possible scenario.

**Hans Buitendijk**
I agree. I think between what David wrote here and what is in the spreadsheet, I think even in the principles, we are aligned, and we have a couple of different examples of that. So, maybe if we can outline it, I would be happy to work with David and you on that.

**Tammy Banks**
I would love it.

**Hans Buitendijk**
Yeah, clearly articulate them as examples and that we really are asking ONC or recommend that they work with da Vinci in the community to figure out what is the right level of granularity. These are some initial thoughts, but clearly, more work needs to be done with the right stakeholders at the table. Part of it is going to be learning as we identify. We think it is these five or 10, whatever, but as we actually get through the initial implementations, we see that the boundary may need to shift a little bit or clarify whatever. It is only meant to be examples, thoughts.
**Dave DeGandi**
This model could also mature as the industry matures also.

**Hans Buitendijk**
Yes.

**Tammy Banks**
Yes. So, the following is a possible example for ONC to work with the da Vinci project and stakeholders to finalize the iterative plan leading toward adoption of the IGs?

**Sheryl Turney**
Yes.

**Tammy Banks**
Okay, and I will correct all this. I do not want to say relevant. Key stakeholders, maybe?

**Sheryl Turney**
Yes.

**Eliel Oliveira**
Tammy, if I may add on stakeholders, maybe in parenthesis we spell them. I am thinking in my head, of course: payers, providers, and HIT developers. But the reason I am saying this is patients as well because that could be an oversight, leaving them out. I think it is very important that we get the patient's voices as the setup comes together.

**Tammy Banks**
Love it. Any other thing? I thought it was important to have a caveat that we agree. And then, I am not going to go through this piece if Hans, David, and anybody else – maybe Patrick and Raj want to go through and figure out if there need to be two different recommendations.

**Dave DeGandi**
Modifying this one? Sure.

**Tammy Banks**
Yeah, and help me because I am not technical. Do we need this as an example, and do we need the spreadsheet as an example, or how do we marry this into the report to be clear and concise? I need your guidance on that.

**Rajesh Godavarthi**
We can work on that.

**Sheryl Turney**
It may be, Tammy, that we might want to include the spreadsheet as part of the appendix even though we draw the information out and included it in the report.
Tammy Banks  
Perfect was just, yeah, perfect. Well, and I am thinking that we would also put the Google Doc as an appendix as well because there is a lot of wealth of information there. But again, we are trying to pull out and make this easy to read, and our major points get expressed early on in the report.

Sheryl Turney  
All right. Heather has her hand up too.

Heather McComas  
Yeah. I know the option line does not count as an example, but I think it is really important, that verbiage, to add something like, "When a clinical provider submits an order for a service to be performed, and for which the patient intends to use their insurance benefits." Because we want to make sure that the CDS hook is not triggering when the patient wants to self-pay for the service. That is a big patient privacy issue. So, I think we should put something in there about that. I am happy to wordsmith.

Tammy Banks  
You got it. Please do. Does anyone have any aversion to that added clarity? Perfect.

Now, the other thing we keep going back and forth on this is the use of an EHR native solution. I had changed that wording because I totally understand if EHR was the sole one doing it, obviously it would make it easier. Right? But that is not the reality across all the different workflow options. And so, I had put, "Where it is in the provider's workflow," because even if the EHR is partnering with the Smart on FHIR or partnering with the revenue cycle, it is still going to come through as a seamless workflow for the providers. That is the end goal. Am I missing your point, David, or are you just saying, only in the instance when DEH already does everything, then those?

Dave DeGandi  
So, you are talking about the best option, which is above where you are at. It is not in the same section; it is higher. Section 1.1.

Tammy Banks  
Okay, so maybe I am misunderstanding.

Dave DeGandi  
I added some content in there to describe my comments.

Tammy Banks  
Okay, sorry I missed that. Okay, well do you mind just giving us the flavor of it?

Dave DeGandi  
So, this is really saying that EHR developers are the ones that will know the systems the best: where the data is stored, the contents of the data, be able to develop the most dynamic or most integrated solution for the providers. I am just saying it is the best option from that point of view, not by far the only option.
Any comments on that? Oh, Patrick. Sorry, I did not see your hand. It blended in with the books.

Patrick Murta  
Actually, my hand up was on from the previous thing. Tammy, we can stay with David’s point, but the word is native to the EHR. The best option is to have the function native to the HER. I think if we say, The EHR is in the best position to understand the visualization and the interactions with the workflow," absolutely. I am not sure that needs to be called out.

Dave DeGandi  
That would explain what I am trying to say there, yes.

Patrick Murta  
Ok, got it. Where I was going with this – and David, you and I were going around on the weekend on this one, is are we saying, and I know Raj, myself, Hans, they were going to take us offline and wordsmith it that these are examples? I get nervous when we say in this document that we should be allowing an EHR [inaudible] [01:13:27] access to reading and updating workflow queues. Why would we be calling that out on this document? That really should be an implementation guide. Or are we just saying this is an example of what an implantation guide should have? I am not sure why this little detail is in this document.

Hans Buitendijk  
And perhaps to add to that, some of those, why is it even in implementation guides? Because some of that, it is entirely up to the HIT that is managing that part. It could be HR. It could be the smart app. It could be some other system that manages that point. How best to do that in the context of what else they do? So, I think the focus of these guides and what we do in certification is on the interaction. We communicate consistently. We know what it means. But how do you have a system that takes advantage of that? We need to be very careful with that. Those early days EHR, being full use, was done to a greater or lesser extent, but it was more done. What you see is over time we really shifted to an interoperability focus. Make sure that we talk, but do not describe how each side of that conversation does what they need to do.

Tammy Banks  
David, I really appreciate you dropping this in. Hans, you made a really good point that we have to be specific, right? And the question is: How specific can we be with bringing clarity moving forward? So, I think you guys are coming up with a good directional flow will really help provide guidance in our report. Raj?

Rajesh Godvarthi  
I think that is what I was going to say.

Tammy Banks  
But Raj, you would have said it better; you can say it again.

Rajesh Godvarthi  
No, I was thinking that we sit really nice with the capabilities, the workflows, and certain things. That is where we should state at what level. The how is already defined in the implementation guides. So, if we redefine in any sense, even as an example, if there is a discrepancy between that and the implementation
guide, then we are introducing a whole set of problems. So, I love the structure here, but I think we just have to be careful.

**Tammy Banks**
But would you agree that if we could give an example recognizing all of the different flavors, and to say that this is not it? You have to go to the implementation guide but show the clarity depending on how the vendors are working together, that would help those of us who are not as technical as you and need that guidance to understand where you guys are coming from.

**Rajesh Godvarthi**
Yeah, that is what I am saying. We would work on that.

**Tammy Banks**
Do not get rid of it because this is good stuff, but it has to be in a way that is not being prescriptive, right?

**Rajesh Godvarthi**
Thank you, exactly.

**Dave DeGandi**
And maybe this belongs more in the implementation guide or pointed to what the content the implantation guide talks about in this portion.

**Tammy Banks**
I think you are adding clarity to Han’s presentation. I think you guys working together will come up with a good consensus. These are the visuals; these are all of the HIT vendors that can work together. Here is an example of how it has to be looked at, working with da Vinci and the limitation guides. This makes more sense to me on how each party engages. Okay.

**Sheryl Turney**
We are out of time for public comment, and we have a couple of hands being raised.

**Tammy Banks**
Hans and Heather, and then we are done. How is that?

**Hans Buitendijk**
I completely agree with David. A lot of this should end up in the implementation guides because they ultimately are currently too big to understand what piece makes sense if I have a particular HIT configuration. That is a good place to describe that, to identify the relevant interactions for that particular connection. I completely agree with Dave. That is where it needs to end up. This is an example of what it could look like.

**Tammy Banks**
Heather, make it good. You are the last comment for today.

**Heather McComas**
I am just picking up the thread of David and Hans. I think that is a great point. I am wondering if – I mean, I think there is good stuff here. If there is stuff here that we think should be detailed in the implementation guide, is there a way or place for us to do that? If there is granularity that we need to be added to the implementation guide, realizing it is off our ballot right now, is there someplace that this task force can put this in the recommendations? Just a question.

**Tammy Banks**

We are fortunate to have several da Vinci members.

**Dave DeGandi**

I am signed up on the ballot, and I am registered to submit any comments I want to. So, yes.

**Sheryl Turney**

Yes.

**Tammy Banks**

Good point. All right, take it away, public comment.

**Public Comment (01:18:43)**

**Michael Berry**

Thank you, Sheryl and Tammy. We will pause here for public comments. If you are on Zoom and would like to make a comment, please use the raise hand function, which is located on the Zoom toolbar at the bottom of your screen. If you happen to be on the phone only, press *nine to raise your hand. Once called upon, press *six to mute and unmute your line. Let us pause to see if we have any public comments.

I am not seeing any public comments at this time. So, I will turn it back to our co-chairs. Sheryl, Tammy?

**Sheryl Turney**

All right. Thank you. So, Tammy, do you want to go over the homework as you have already been assigning things?

**Homework and Next Steps (01:19:31)**

**Tammy Banks**

I would love to. I love assigning. Hans, if you do not mind going back and wordsmithing that additional bullet, we would be deeply appreciative. David, if you do not mind taking the lead with Hans, Patrick and Raj, and anybody else, and come up with: What is the consensus piece that we should drop into the report, recognizing we will add the Excel spreadsheet attachment at the end, and pull out that relevant information, and drop that in the report as well.

And just the rest of the group, hang tight. We will hopefully have a report for you to review by Monday. Sheryl, can I say that?

**Sheryl Turney**
Yes, Monday 10:00. And also, hopefully, shortly after, we will have created the presentation. We will present the report to HITAC once we get their final comments, and our presentation will be next Thursday, on the 10th. Unfortunately, we have a very tight timeline for all of this. And Tammy, when are you going to want to these guys to have their final edits in? Because we will have to cut and paste the information into our report and then, also, attach our [inaudible] letter, which I have already started working on.

**Tammy Banks**
End of day. No. If there is any way, on Friday, if you guys can hammer that out. Sheryl and I are devoting most of our Friday to getting the report in a format that you can review and make it more digestible. That would be helpful. If you guys need the weekend, early Monday, but we are at the point that if we can get this done quickly, we would be appreciative. Is that doable, folks?

**Hans Buitendijk**
Generally, but the question is: when will you take…David, Patrick, and Raj, and I have the Google Doc already for the examples. When will you have the Word document you were working on into Google so that we can collaborate on some of those bullets that we have assignments on?

**Sheryl Turney**
Can do that right after this meeting, Tammy?

**Tammy Banks**
Yes. Yes. Yes. Let me think about how I will put it in the Google Doc, and I will send an email to the group when I figure that out.

**Hans Buitendijk**
Okay.

**Tammy Banks**
Because I think I will just drop it into the report, Sheryl, instead of creating another document.

**Sheryl Turney**
Yeah, I think that is good. The report is already out there. I do not know if everybody has the ability to go in and make changes to it, other than you, though.

**Tammy Banks**
Okay.

**Sheryl Turney**
Why do you not clean that up with Michael?

**Tammy Banks**
I will email, I will send a word copy to David. I will send a word copy to you guys to take a look at, but we will have the report available by end of the day on Friday.

**Dave DeGandi**
I am able to access it from my personal computer.

**Sheryl Turney**  
Okay. Yeah, same here. Okay.

**Dave DeGandi**  
I just cannot from my work computer.

**Tammy Banks**  
And you guys need anything else? So, you need to document that I am working on right now that I pulled the bullet from the Google Doc. So, I will send that in Word to you guys, recognizing – I want you to save any edits or changes until you see it in the report, okay?

**Sheryl Turney**  
Okay. Okay. So, we will put it in the report. Then, we will email them tomorrow with the link to the Google Doc, so that they can go in and do some wordsmithing.

**Tammy Banks**  
Yes.

**Sheryl Turney**  
Okay.

**Tammy Banks**  
I did not think homework would be the most controversial.

**Sheryl Turney**  
And then Monday, we will be able to show the report to the work team.

**Tammy Banks**  
Yes.

**Sheryl Turney**  
Okay. All right. That sounds good. Heather has her hand up.

**Heather McComas**  
Just a process question. So, after we review the report on Monday, and there will be a presentation of slides, and then there is the presentation with HITAC next Thursday, I guess. Do we look at things again? When is our last pass? I was not sure if we look at it again after comments from HITAC are received.

**Sheryl Turney**  
We will not have the opportunity to because of the deadline for the RFI. So, we will really have to have it ready to go forward after our presentation on the 10th. Now, it may be that there is a couple of questions, or whatever, that people have, that we may have to clean up some areas if that is the case. Michael, you correct me, but I think by Friday, we really have to have the transmittal due for ONC, right?
Michael Berry
Right. The HITAC will vote, and it is a majority vote that will adopt the recommendations, and then it will be transmitted to Nikki for his review. Like you said, Sheryl, likely on Friday.

Sheryl Turney
So, we really will not have another stab at it other than in the HITAC meeting itself.

Michael Berry
That is for HITAC members only, just to be clear. The task members are certainly welcome to join as members of the public. The registration link is on our website. But the discussion book will be just among the HITAC members, five of which are in this task force.

Sheryl Turney
Just to restate and clarify because there are still comments in the chat. The Google Doc will be available to the subcommittee tomorrow, after Tammy and I cut and paste everything in. And we are doing a work session tomorrow morning to try to get that accomplished.

Patrick Murta
Thank you for the clarification, Sheryl, because I think a few of us noted some of this goes to work accounts, and some of this goes to our personal accounts to edit Google. So, we have got to make sure that we get the appropriate notifications to get in there.

Sheryl Turney
Yeah, and that is true too. I will make sure that all of the current accesses are provided that are needed for the final document because I have that same issue. I cannot get it to work.

Patrick Murta
Thank you.

Tammy Banks
Is it doable, or do you need Word versions? Just need a heads up.

Patrick Murta
Google Doc only, please. [Inaudible] [01:25:54].

Sheryl Turney
It will be too hard to manage copies. We do not have enough time.

Tammy Banks
All comments need to be in the Google Doc now. The other is just to review it and get comments together earlier.

Sheryl Turney
Perfect.
Tammy Banks
Okay. Well then, thank you, everybody, I really appreciate everybody's expertise, input, and active participation. This has been a pleasure, and you guys have a great weekend looking at these documents.

Hans Buitendijk
Thank you, everyone.

Heather McComas
Bye. Thanks, everyone. Have a good day.

Patrick Murta
Bye.

Adjourn (01:26:36)