



- Who am I and what does my company do?
 - My name is Bruce Schreiber. I am the CTO at MaxMD. MaxMD is a privately held EHNAC accredited HISP, RA, and CA. Our company has been involved in the secure healthcare business for 8 years. We are active contributing members of DirectTrust and participate in the following working groups that are shaping the standards and direction of the nation's healthcare secure communication policies and technology:
 - The Security and Trust Compliance Work Group
 - The Certificate Policy and Practices Work Group
 - The Standards and Interoperability Framework Work Group
 - The Pilot Trust Framework Committee
 - The Certificate Policy and Practice Workgroup
 - The Trust Anchor Bundle Operations Workgroup
 - Trust Anchor Approval Committee – voting member
 - The Patient and Consumer Participation in Direct Workgroup
 - The Direct Directory Policy Workgroup – co-chair
 - As an accredited HISP we operate a Security and Trust Agent according to the specifications of the Applicability Statement for Secure Health Transport and DirectTrust/Direct Project policies. As a EHNAC accredited CA and RA we identify proof our customers, issue Direct Certificates and Direct Accounts. Our CA certificate is in the DirectTrust Transitional Trust Anchor Bundle. This Trust bundle enables interoperability by creating a central repository for DirectTrust accredited HISPs Trust Anchors without the need for negotiated one off DURSA's of other agreements. Direct Certificates issued by participating HISPs will pass the trust requirements between accredited HISPs.
- What is our role making Transitions of Care possible for Stage 2 MU
 - The MaxMD HISP operates as a SAAS solution enabling EHR technologies to achieve ONC certification. Our HISP facilitates the sending and receiving of TOC data using the Direct Protocol. We help EHR vendors pass the NIST Transport Testing Tool during the certification test.
 - Our EHR technology customers are provisioned with Direct Accounts that can interoperate with any other Direct enabled Health Care technology.
 - MaxMD can extract data from legacy technologies, structure the data and then deliver TOC via the Direct Protocol through the MaxMD HISP Security and Trust Agent (STA). Our STA supports all the Direct Edge Protocols (SMTP, XDR/XDM, SOAP+XDR/XDM, SFTP).
 - MaxMD is also addressing the edge community issues by offering data translation capabilities to deliver structured and unstructured data via Direct to entities not using certified EHR technology.
 - Generally adding just the MaxMD HISP directly to an EHR technology is a one to two week exercise. Our data translation offering can be added to legacy technologies to produce structured TOC in a two to four month time frame. This is largely dependent on scope of the project.



- How are you addressing certification requirements
 - As mentioned earlier, the MaxMD HISP is EHNAC accredited as a HISP, RA, and CA under the DTAAP accreditation program.
 - We have assisted many ambulatory vendors in ONC certification.
 - We have connected our HISP to acute EMR technologies as well.
 - We offer Message Delivery Notification and Delivery Status Notification to assist our clients in calculating the numerators for MU2 reporting. Our EHR partners calculate the denominator.
- Interoperability questions
 - MaxMD participates in Connect-a-thons. We also actively work with DirectTrust and other HISPs to test and solve interoperability issues.
 - The MaxMD CA certificate is in the DirectTrust transitional trust bundle.
- TOC Issues
 - The initial issue EHR vendors reported was structuring the data for certification. That issue has been largely solved with software enhancements or third party add-ons.
 - Staff training issues vary by EHR technology vendor. The concern we hear reported are about workflow changes and EHR ergonomics.
- What fees are you charging customers for TOC transactions
 - MaxMD is an account subscription model. We feel this is scalable and sustainable. We do not charge transaction fees for Direct Messages.
 - If a customer proposed a different economic model, we would entertain it.
- What issues with regard to exchange are you encountering?
 - With regard to exchange of TOC of any form, it is too early to report issues or results.
- Other Issues
 - We support the DirectTrust/EHNAC accreditation program. We believe that accreditation promotes scalable Trusted Exchange among audited entities with known policies and procedures.
 - We are concerned that vendors can achieve ONC certification without the assistance of an accredited HISP.
 - We believe messaging around MU incentives should focus on the vision and benefits of future interoperability. We want achieving the MU metrics to be a starting point and not a goal unto itself.