



**Public Comment for the Joint API Task Force
ONC
March 22, 2016**

A public comment at this Task Force March 8 asserted, among other points, that DirectTrust (quote) "...has been a disaster..." (unquote) for patients. DirectTrust takes this opportunity to respectfully disagree. DirectTrust, in creating a voluntary security and trust framework and supporting a large and growing network for health information exchange (HIE), is mindful of and honors the importance of patients and consumers and their personal health information (PHI). We are dedicated to making patients full and equal participants in secure sharing of information with providers and others. DirectTrust has several policies and a strategic plan that place Direct exchange for patients as a top priority of the community.

What distinguishes DirectTrust's role in the HIT space is commitment to privacy, security and trust in identity, consistent with HIPAA. Given the increasing rate and number of breaches of PHI and the huge cost to patients and providers and payers, DirectTrust hopes there is little disagreement about the *need* for security controls adequate to protection of HIE. We believe that without privacy protections and assurance of security, there can be - in fact should not be - trust in HIE.

DirectTrust's vision is (quote) "*A community confident in secure exchange and use of trusted digital health information for the betterment of health and care.*" (unquote) We strive to achieve this vision through support of (quote) "*health information exchange that is secure, interoperable, affordable, and widely available, in the interest of the public good (unquote; DirectTrust Mission).*" We do this through creation and constant fine-tuning of our trust framework, comprised of policy, accreditation, trust bundles, reporting and enforcement. This is all voluntary and these are *not* barriers to HIE by any party in any way.

DirectTrust's high level of security and trust in identity is a *voluntary option* for organizations and individuals who value security and privacy of PHI when engaging in HIE. We are working on a comprehensive strategy that accords patients the same opportunity to protect their PHI as we make available to providers. We have members now designing the Direct exchange experience expressly for patients and consumers. This will enable patients and consumers to control requests for and sending of their own PHI as easily and securely as the tens of thousands of provider organizations now use Direct messaging for transitions of care and other care coordination use cases. We believe consumer/patients and their providers deserve no less.

DirectTrust encourages and supports policy that extends the *voluntary option* of security and privacy protections into expansion of HIE technology, such as APIs and their associated APPs. A medical record is alleged to be worth \$50 on the black market, compared to about \$.50 for a mere social security number. Patients and consumers should have the option to try to ensure this doesn't happen to them. Thank you.