

Health IT Policy Committee

A Public Advisory Body on Health Information Technology to the National Coordinator for Health IT



Interoperability and Health Information Exchange Workgroup

Micky Tripathi, chair
Chris Lehmann, co-chair

December 9, 2014



- Review Recommendations

Membership



Health IT Policy Committee
A Public Advisory Body on Health Information Technology

First	Last Name	Organization	Role
Micky	Tripathi	Massachusetts eHealth Collaborative	Chair
Christoph	Lehmann	Vanderbilt School of Medicine	Co-Chair
Brian	Ahier	Medicity	Member
Beth	Morrow	The Children's Partnership	Member
Arien	Malec	RelayHealth Clinical Solutions	Member
Larry	Garber	Atrius	Member
Ray	Scott	Arkansas Office of Health Information Technology	Member
Jitin	Asnanni	athenahealth	Member
Tony	Gilman	Texas Health Services Authority	Member
Landen	Bain	CDISC	Member
Shelly	Sprio	Pharmacy HIT Collaborative	Member
Troy	Seagondollar	Kaiser / United Nurses Association of California	Member
Melissa	Goldstein	The George Washington University	Member
Carl	Dvorak	Epic	Member
Marc	Probst	Intermountain Healthcare	Member
Wes	Rishel	Consultant	Member
Dave	Whitlinger	New York eHealth Collaborative	Member
John	Blair	MedAllies, Inc.	Member
Hal	Baker	Wellspan	Member
Kitt	Winter	Social Security Administration	Ex Officio
Margaret	Donahue	Department of Veterans Affairs	Ex Officio
Nancy J.	Orvis	Department of Defense	Ex Officio
Barclay	Butler	Defense Health Agency	Ex Officio
David	McCallie	Cerner Corporation	Liaison Member
Deven	McGraw	Manatt, Phelps & Phillips, LLP	Liaison Member



- Review the Jason Task Force and Governance Subgroup materials and recommend how to synthesize and incorporate them into the Interoperability Roadmap.
- If time allows identify any red flags in the early draft materials presented on the Interoperability Roadmap.

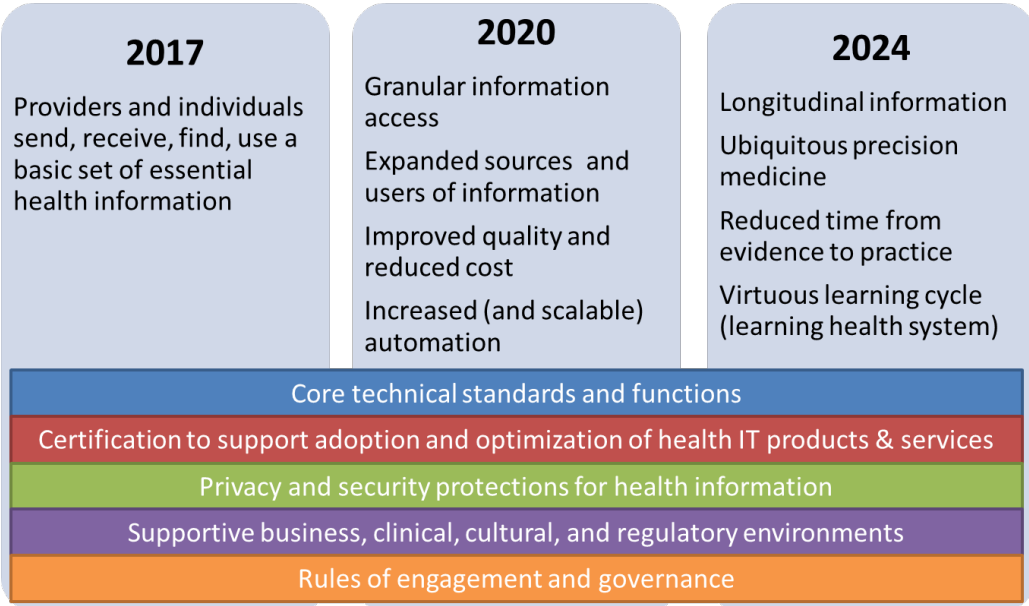
Meeting Schedule



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Meetings	Task
October 9, 2014, 12:00-1:30 PM ET	<ul style="list-style-type: none"> Review charge and workplan Review Governance recommendations
October 21, 2014, 2:30-4:00 PM ET	<ul style="list-style-type: none"> Review JASON TF recommendations Feedback from HITPC/HITSC Prepare to inform Interoperability Roadmap
October 29, 2014, 2:00-3:30 PM ET	<ul style="list-style-type: none"> Inform Interoperability Roadmap
<i>HITPC Meeting November 4, 2014</i>	<ul style="list-style-type: none"> <i>Draft recommendations to HITPC</i>
November 5, 2014, 10:00-11:30 AM ET	<ul style="list-style-type: none"> HITPC feedback integrated into recommendations
November 19, 2014, 9:00-10:30 AM ET	<ul style="list-style-type: none"> Refine recommendations
December 1, 2014, 1:00-2:30 PM ET	<ul style="list-style-type: none"> Refine recommendations
<i>HITPC Meeting December 9</i>	<ul style="list-style-type: none"> <i>Final recommendations to HITPC</i>
December 16, 2014, 10:00 AM-11:30 AM ET	<ul style="list-style-type: none"> <i>Interoperability Measurement</i>

ONC Roadmap Vision and Building Blocks



• Oct 29: Vision

- Oct 29/Nov 5: Rules of engagement and governance
- Nov 5/Nov 19: Core technical standards and functions (policy dimensions only)
- Nov 19/Dec 1: Supportive business, cultural, and regulatory environments

Summary of Interoperability Roadmap recommendations



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- 1. Explicitly endorse and map to the JASON Task Force Report recommendations**
- 2. Identify specific market motivating implementation actions that the Federal Government could/should/will take to promote interoperability:**
- 3. Define measures of interoperability status and progress**
- 4. Explicitly set the context for the Roadmap – is it descriptive of all of the activities taking place in the market, or prescriptive in proposing specific approaches and trade-offs?**
- 5. Map actions to actors**
- 6. Other items to consider**



1. **The Roadmap should explicitly endorse and map to the JASON Task Force Report recommendations**
 - Coordinated Architecture and Public APIs
 - Key elements are:
 - Loosely coupled architecture connecting disparate Data Sharing Arrangements
 - Public API which has a technical component (data-level and document-level access) and a policy component (terms for accessing APIs across entities)
 - FHIR as the current best candidate for the Public API

2. **The Roadmap should identify specific market motivating implementation actions that the Federal Government could/should/will take to promote interoperability.**
 - The Roadmap should create a framework for describing federal orchestration of the many levers that it has at its disposal
 - We recommend aligning the Roadmap with the JASON Task Force report which provides a framework for escalating government actions to motivate the market.
 - Transparency. Aggressive and ongoing public monitoring of the pace of development and use of network mechanisms through collection of API usage data and development of an adoption evaluation framework to facilitate Public API-based exchange. (e.g., Continue to fund and promote research on the effectiveness of various interoperability approaches including the Public APIs)
 - Guidance. Issuing authoritative, ongoing guidance to provide industry-wide direction and benchmarks, and to encourage specific actions for the development of DSNs and the Coordinated Architecture Organization. Convening existing exchange networks (i.e., prospective DSNs) to catalyze adoption of the Public API and development of industry-based governance mechanisms
 - Incentive alignment. Aligning incentive programs and existing regulatory processes to stimulate use of the Public APIs, such as ACO contracts, LTPAC regulation, lab regulation, **pharmacy regulation** etc.
 - Federal operational alignment. Requiring federal healthcare entities to adopt the Public APIs in their technology procurement activities and day-to-day market interactions, such as Medicare/Medicaid, Department of Defense, Department of Veterans Affairs, Indian Health Services, NASA, etc.
 - e.g., CMS expose Public API for CQM reporting, MU attestation, and other reporting
 - e.g., DoD/VA/IHS implement pluggable apps based on Public API



- The Federal Government could:
 - Federal government *should consider* taking the following steps to enable orchestration of Core Services across the DSNs:
 - DSN bridging standards. Developing voluntary standards for vendor-neutral, cross-DSN bridging to fully enable the narrow set of robust transactions required for the loosely coupled architecture (such as patient identity reconciliation, authorization/authentication, key management, etc)
 - Nationwide shared services. Developing standards for, and ensuring deployment of, universally necessary shared services that are highly sought after and thus would facilitate DSN alignment, such as public use licensed vocabularies, and perhaps nationwide healthcare provider and entity directories, etc.
 - The government *may* choose to consider direct regulation of DSNs in the event that the market does not develop effective coordination mechanisms
 - Such actions would involve a significant increase in the government's regulatory authority over health information exchange activities, which would have high risk of unintended consequences that could slow market progress.
 - Any such increase in regulatory authority should be carefully considered through evaluation of reasonable and meaningful benchmarks, and specifically calibrated to address any remaining barriers that the market has failed to overcome.

3. The Roadmap should define meaningful measures of interoperability status and progress

- Each milestone should be tied to a measure
- The measurement focus should be on outcomes as much as possible with a decreased emphasis on transactional and process measures.
- We note that this is a highly complex area with much thought to be given about the balance and feasibility of outcomes versus transactional or process measures.
- The IOWG will provide recommendations on principles for interoperability measurement in our recommendations on v1 of the Roadmap.



- 4. The Roadmap, if it is to be a “Roadmap”, should be a prescriptive document**
- Need to decide whether the level of detail is directional or specific
 - If specific, would need to propose narrow approaches and highlight trade-offs
 - The road to interoperability will require hard decisions where uniformity or reduced optionality is required and the ecosystem has taken multiple differing approaches.
 - The outcomes of these decisions will necessitate rework by some stakeholders. Careful consideration should be made around these important and necessary decision points.
 - A glide path should be outlined for stakeholders who will need to make changes to align with the selected direction.
 - Also need to decide whether the Roadmap is aspirational (i.e., an indication of where the Federal Government would like the industry to go) or directive (i.e., will be promoted and enforced through specific government actions – incentives, regulations, market actions)



5. Map actions to actors

- The Roadmap should explicitly call out the actors who will be expected to implement the various actions/milestones outlined in the Roadmap. This will help coordinate actions across the ecosystem and help reduce duplicate efforts.



- 6. During the IOWG deliberations a number of specific items were identified that the group would like to see added to the Roadmap:**
- Orders is a big gap in vocabularies and needs to be addressed. The Roadmap should outline steps to address this need.
 - The Roadmap should make clear that existing approaches will continue to be refined to serve ongoing needs and to fill specific gaps
 - Registries have a continued important role to play in the ecosystem and should be appropriately represented in the Roadmap
 - Existing approaches (NCPDP, XCA/XDS, etc) will continue to serve specific purposes and be refined by users accordingly

