

Interoperability Standards Advisory Summary of Public Comments and Next Steps

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Chris Muir

OVERVIEW

- ONC's first deliverable in support of the Nationwide Interoperability Roadmap towards a Learning Health System.
- Provide the industry with a single, public list of the standards and implementation specifications to achieve a specific clinical health information interoperability purpose.
- Prompt dialogue, debate, and consensus among industry stakeholders when more than one standard or implementation specification could be listed as the best available.

- Non-binding
- May be adopted in regulation, required as part of a testing and certification program, or included as procurement conditions.
- Provide stakeholders who administer programs, procurements, and testing or certification programs with an advisory to help achieve their interoperability goals.
- Serves to provide clarity, consistency, and predictability for the public.
- Does not yet represent the full breadth and depth necessary for all purposes for which stakeholders may seek to interoperate but will expand incrementally in the future.

SUMMARY OF PUBLIC COMMENTS

- **A total of 59 entities that provided public comments from a diverse set of stakeholders, including:**
 - People and orgs that provide health IT capabilities: 19 entities (32%)
 - People and orgs that deliver care: 17 entities (29%)
 - People and orgs that generate new knowledge, whether research or quality improvement: 8 entities (13%)
 - People and orgs that govern, certify, or have oversight: 7 entities (12%)
 - People and orgs that develop and maintain standards: 6 entities (10%)
 - People and orgs that support public good: 1 entity (2%)
 - Organizations that pay for care: 1 entity (2%)
 - People who receive care: no comments received.

- **Of the 59 entities that provided public comments:**
 - 32 supportive
 - 8 not supportive
 - 19 neutral

- There was a lot of interest to expand the scope of ISA but not a lot of consistency as to which areas, except:
 - Security Standards
- Provide definitions to terms like “purposes,” “standards,” “implementation specifications,” etc.
- Some changes to the tables. Example: recommendations that IHE profiles move from standards to implementation specifications.
- A lot of interest in the ISA update process and the criteria for “Best Available” (but lack of consistency of feedback).
- A lot of interest in receiving guidance on the maturity of standards.
- Interest in the ISA telegraphing future changes to standards or implementation specifications.

- 5-1. What other characteristics should be considered for including best available standards and implementation specifications?
 - ~ Seventeen (17) entities provided suggestions for characteristics
 - Comments across them were not consistent
- 5-2. Besides the four standards categories included in this advisory, are there other overall standards categories that should be included?
 - ~ Twelve (12) entities provided suggestions
 - Adding security standards was a consistent theme

- 5.3. What “purposes” are missing?
 - Twenty-three (23) entities suggested new purposes
 - But no consistent suggestions
- 5-4. Is a standard or implementation specification missing that should be included?
 - ~ Seventeen (17) entities provided suggestions; some entities provided numerous suggestions
 - Not much consistency about what should be included

- Overall support for ISA
- Feedback was wide and varied not only on structure and process, but also on standards and implementation specifications
- Overarching themes include:
 - Ongoing transparency
 - Predictability balanced by ability to innovate
 - Concern for security
 - Interest to expand the ISA to further support the Roadmap

NEXT STEPS

May - June

- Comment period expired.
- Analysis of feedback.
- HITSC ISA Task Force established.
- A summary of public comments is presented to HITSC by ONC on June 24.

August

- HITSC receives recommendations from ISA Task Force on August 26.
- HITSC submits recommendations to the National Coordinator.

September

- ONC updates ISA based on HITSC recommendations and a second round 60-day public comment will be opened.

November – December

- Comment period will expire.
- ONC will review and analyze public comments.
- ONC will prepare the next year's Interoperability Standards Advisory for publication.
- 2016 ISA is published.

- By the August 2015 HITSC meeting, submit final recommendations to the HIT Standards Committee regarding revisions ONC should consider as it creates a 2016 Interoperability Standards Advisory (ISA).

- 2015 ISA - <http://www.healthit.gov/standards-advisory>
- Public Comments - <http://www.healthit.gov/policy-researchers-implementers/2015-interopability-standards-advisory-public-comments>

Questions?

Thank You