February 22, 2016

Dr. Karen DeSalvo
National Coordinator
Office of the National Coordinator for Health Information Technology
200 Independence Avenue S.W. Suite 729-D
Washington, D.C. 20201

Dear Dr. DeSalvo:

The Sequoia Project is a neutral, stakeholder-driven, public-private collaborative whose sole mission is advancing secure, trusted, interoperable health data sharing across the U.S. We support multiple, independently-governed initiatives, such as the eHealth Exchange, the largest data sharing network of its kind in the US, and Carequality, which provides the Carequality Interoperability Framework to govern interoperable exchange between and among data sharing networks, programs, and platforms.

The Sequoia Project also champions interoperability, building upon the successes across industry and government and working proactively to identify and systematically address known impediments to interoperability.

In the spirit of our mission to pursue interoperability in the public interest, we are very pleased to offer our pledge of support and commitment to help execute and further advance the ONC Interoperability Road Map.

Interoperability Pledge

The Sequoia Project shares the principle that to achieve an open, connected care for our communities, we all have the responsibility to take action. To further these goals, we commit to the following principles to advance interoperability among health information systems enabling free movement of data, which are foundational to the success of delivery system reform, including:

1. **Consumer access:** To help consumers easily and securely access their electronic health information, direct it to any desired location, learn how their information can be shared and used, and be assured that this information will be effectively and safely used to benefit their health and that of their community.

   - The Sequoia Project and our initiatives are working to enable consumers to more easily and securely access their electronic health information to improve individual and population health.

   - The eHealth Exchange is preparing to pilot a new use case, which will enable consumers to request access to their health information across this nationwide network.

   - In addition, consumer access to information is supported by the Carequality Interoperability Framework. We are committed to working with personal health record (PHR) services and other

consumer-facing applications to ensure their appropriate and secure access into the broader Carequality exchange ecosystem.

2. **No Blocking/Transparency**: To help providers share individuals' health information for care with other providers and their patients whenever permitted by law, and not block electronic health information (defined as knowingly and unreasonably interfering with information sharing).

   - The Sequoia Project's work focuses on promoting open, transparent sharing of information, with emphasis on developing strategies and implementing policy and trust frameworks that discourage data blocking.
   - The policies and legal framework upon which the eHealth Exchange are built were guided by ONC as the network was formed back in 2009. Open, inclusive data sharing across the private sector and with governmental agencies was central to its mission and fueled subsequent growth.
   - Carequality, in particular, has taken a strong stand on information blocking by adopting its Non-Discrimination Principle, one of its foundational Principles of Trust. This principle embeds policy prohibitions on information blocking into the basic DNA of the Carequality Framework, which is legally-binding.
   - In further commitment to transparency in information sharing, Carequality also requires implementers of the Carequality framework to make publicly available an accurate statement of their information handling practices.

3. **Standards**: Implement federally recognized, national interoperability standards, policies, guidance, and practices for electronic health information, and adopt best practices including those related to privacy and security.

   - The Sequoia Project and its initiatives implement federally-recognized and national interoperability standards throughout our work. We firmly believe in the importance of interoperability standards and advocate for open approaches to interoperability that are built upon standards that work nationwide.

We look forward to our continued collaboration with ONC and the many stakeholders engaged in The Sequoia Project's work and to advancing interoperability in the US to enable better and more effective care for patients.

Kind regards,

[signed]

Mariann Yeager, CEO, The Sequoia Project

www.sequoiaproject.org