July 31, 2017

Steve Posnack, Director, Office of Standards & Technology
Office of the National Coordinator for Health Information Technology (ONC) and
U.S. Department of Health and Human Services
Switzer Building
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Dear Mr. Posnack:

We appreciate the opportunity to provide feedback on the proposed interoperability standards measurement framework published in April 2017. Overall, we found the proposal to be practical and straightforward; and, we encourage ONC to keep the measurements and the process as simple as possible.

Following are responses to the questions posed in the proposal:

1) Is a voluntary, industry-based measure reporting system the best means to implement this framework? What barriers might exist to a voluntary, industry-based measure reporting system, and what mechanisms or approaches could be considered to maximize this system's value to stakeholders?

    A voluntary, industry-based measure reporting system appears to be a practical means of measurement at this time. There are several potential challenges to such an approach, in addition to the ones noted in the proposed framework, such as:

    -   Challenge: Having sufficient participation to have a representative nationwide view of standards implementation and use

        o   Suggestion: In areas where there are gaps in reporting use of standards, assess the viability of using a representative sample to extrapolate use measures to minimize burden and have a more comprehensive view

    -   Challenge: Potential variability in how health IT systems and networks measure and report implementation and use due to varying interpretations

        o   Suggestion: Well-defined measures that result in consistent interpretation and reporting

    -   Challenge: There is a potential that counts of standards use could be double counted, inflating overall measures. For instance, if you measure query transactions from systems and networks that both initiate and respond to queries, you may have duplicative numbers for different sides of the same transaction

        o   Suggestion: Define a methodology to avoid duplicate counting of transactions

    -   Challenge: Reluctance of systems or networks to participate if the measurements are attributed to their specific system or network

  o Suggestion: Aggregate measures across systems and networks to reflect nationwide adoption levels.

2) What other alternative mechanisms to reporting on the measurement framework should be considered (for example, ONC partnering with industry on an annual survey)?

- We encourage ONC to partner with industry on a survey conducted at periodic intervals. We suggest giving careful consideration to the frequency of such surveys, as there can be a substantial level of effort in collecting and analyzing the data which can take some time to process. Rather, consider less frequent surveys to measure progress against realistic implementation and adoption milestones.

3) Does the proposed measurement framework include the correct set of objectives, goals, and measurement areas to inform progress on whether the technical requirements are in place to support interoperability?

- The objectives, goals and measurement areas appear to be reasonable for assessing technical requirements for implementation of standards.

- Numerous other factors need to be considered to assess the impact and level of use of those standards.

  o Sufficient level of granularity of implementation guides and terminologies to assure consistent interpretation of standards in a way that is interoperable

  o There are also important workflow considerations that impact the use and value of data for end users. Rather than trying to assess the factors which impact use of standards, we suggest that other studies be conducted to understand other issues which may impede use beyond technical requirements.

- We suggest adding a measure to assess the level of effort required to enable such interoperability for production use.

  o Many products advertise that they support standards; however, implementation and use of those standards in a production environment can require a wildly different amount of effort to implement.

- We suggest adding a measure for the typical amount of time to implement a given technical interoperability feature for production use.

4) What, if any gaps, exist in the proposed measurement framework?

- ONC should consider impact of systems which are not subject to the certification requirements which could impact implementation and use of standards.
- ONC may want to consider adding a measure to track the percentage adoption by end users (such as physicians).

5) Are the appropriate stakeholders identified who can support collection of needed data? If not, who should be added?

   - We believe ONC has identified appropriate stakeholders who can support collection of the needed data. Getting input from other stakeholders on the framework will be beneficial to assessing the value of the use of standards over time.

6) Would health IT developers, exchange networks, or other organizations who are data holders be able to monitor the implementation and use of measures outlined in the report? If not, what challenges might they face in developing and reporting on these measures?

   - Health IT developers, exchange networks, and other data holders will largely have some method of monitoring implementation and use measures.
   - There are several challenges noted in the framework that need to be considered. For instance, federated networks rely on self-reporting from network participants. Federated network participants sometimes lack the mechanisms to easily report use (e.g. transaction volumes). So, consideration will need to be given regarding the level of burden and reporting capabilities available.

7) Ideally, the implementation and use of interoperability standards could be reported on an annual basis in order to inform the Interoperability Standards Advisory (ISA), which publishes a reference edition annually. Is reporting on the implementation and/or use of interoperability standards on an annual basis feasible? If not, what potential challenges exist to reporting annually? What would be a more viable frequency of measurement given these considerations?

   - An annual basis may be challenging due to the time it takes for data collection, analysis and reporting. We suggest that ONC consider 18-months to 2 years.

8) Given that it will likely not be possible to apply the measurement framework to all available standards, what processes should be put in place to determine the standards that should be monitored?

   - We suggest prioritizing the most critical use cases (e.g. top 3) and measure those. Standards are often used for a multitude of use cases. As a result, a use case context (e.g. for a particular purpose or workflow) will make the measures more meaningful in assessing impact of standards adoption and use.

9) How should ONC work with data holders to collaborate on the measures and address such questions as: How will standards be selected for measurement? How will measures be specified so that there is a common definition used by all data holders for consistent reporting?

   - We would suggest a public-private collaborative process for identifying and prioritizing measures, with the aim to keep the process very simple, straightforward and with minimal burden to all involved.

10) What measures should be used to track the level of "conformance" with or customization of standards after implementation in the field?

- We would suggest identifying conformity assessment and interoperability testing programs to advise on this matter.

- We would also suggest identifying key accelerator efforts (e.g. Argonaut, HSPC, IHE, eHealth Exchange, Carequality, etc.) who tailor standards for implementation in the field to assess how standards are being refined for implementation.

We appreciate the thought and care that ONC has given to the measurement of implementation and use of standards. We encourage starting with a simple approach and a few important measures and then evolve over time. This will enable industry and government to collaborate, learn from early experiences and expand over time, while minimizing burden to those reporting the measures.

We look forward to working with ONC as the measurement process is developed and launched.

Kind regards,

Mariann Yeager

CEO, The Sequoia Project