

September 30, 2022

The Honorable Dr. Micky Tripathi
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C Street SW, 7th Floor
Washington, D.C. 20201

Re: Updates to the Interoperability Standards Advisory (ISA) to include the latest version of the HL7® FHIR® CARIN Blue Button Implementation Guide

Dear Dr. Tripathi:

The CARIN Alliance, a multi-sector group of stakeholders representing numerous hospitals, thousands of physicians, and millions of consumers, individuals, and caregivers requests that ONC update the Health Care Claims or Equivalent Encounter Information for Professional Claims and Institutional Claims in the ISA to include the latest information related to the HL7® FHIR® Consumer Directed Payer Data Exchange (CARIN IG for Blue Button®) Implementation Guide (IG).

The website page currently displays that the guide is in development, however [STU 1](#) was published November 23, 2020. We have received formal approval from HL7 to publish the [STU 2](#) version of the IG. In addition, the STU 1 version of the IG has been implemented by more than 90 percent of all CMS payers including Medicare MA, CMS Medicare FFS, Medicaid MCO, Medicaid FFS, and QHP plans based on publicly available information (<https://www.cmscompliancetracker.com/>).

Therefore, we would ask that ONC make the following updates:

- Change the name of the IG to its actual published name which is “HL7® FHIR® Consumer Directed Payer Data Exchange (CARIN IG for Blue Button®) STU1.”
- Change Standards Process Maturity to “Balloted Draft.”
- Change Implementation Maturity to “Production.”
- Change Adoption Level to “5 circles.”
- Add a new row that says, “HL7® FHIR® Consumer Directed Payer Data Exchange (CARIN IG for Blue Button®) STU2.”
- Change Standards Process Maturity to “Pilot.”
- Change Implementation Maturity to “Balloted Draft.”
- Change Adoption Level to “1 circle.”



Please make similar updates anywhere the CARIN IG for Blue Button is currently mentioned in the ISA. This includes: Health Care Claims or Equivalent Encounter Information for Institutional Claims and Health Care Claims or Equivalent Encounter Information for Professional Claims. For Health Care Claims or Equivalent Encounter Information for Dental Claims, please *only* include the STU2 information mentioned above as the STU1 version of the IG does not include dental claims.

Thank you again for providing the opportunity to comment on the ISA and for considering our recommendations. We appreciate your consideration and if you have any questions or additional follow-up, please contact a member of our team at mark.roberts@leavittpartners.com or ryan.howells@leavittpartners.com.

Sincerely,

The CARIN Alliance