

Transcript

HEALTH INFORMATION TECHNOLOGY ADVISORY COMMITTEE (HITAC) U.S. CORE DATA FOR INTEROPERABILITY TASK FORCE 2021 MEETING

May 18, 2021, 10:30 a.m. – 12:00 p.m. ET

VIRTUAL



Speakers

Name	Organization	Role
Leslie Kelly Hall	Engaging Patient Strategy	Co-Chair
Steven Lane	Sutter Health	Co-Chair
Ricky Bloomfield	Apple	Member
Hans Buitendijk	Cerner	Member
Grace Cordovano	Enlightening Results	Member
Jim Jirjis	HCA Healthcare	Member
Ken Kawamoto	University of Utah Health	Member
John Kilbourne	Department of Veterans Health Affairs	Member
Leslie Lenert	Medical University of South Carolina	Member
Clement McDonald	National Library of Medicine	Member
Aaron Miri	The University of Texas at Austin, Dell Medical School and UT Health Austin	Member
Brett Oliver	Baptist Health	Member
Mark Savage	Savage Consulting	Member
Michelle Schreiber	Centers for Medicare and Medicaid Services	Member
Abby Sears	OCHIN	Member
Sasha TerMaat	Epic	Member
Andrew Truscott	Accenture	Member
Sheryl Turney	Anthem, Inc.	Member
Daniel Vreeman	RTI International	Member
Denise Webb	Indiana Hemophilia and Thrombosis Center	Member
Michael Berry	Office of the National Coordinator for Health Information Technology	Designated Federal Officer
Al Taylor	Office of the National Coordinator for Health Information Technology	Staff Lead





Call to Order/Roll Call (00:00:00)

Operator

All lines are now bridged.

Mike Berry

Great. Thank you very much, and good morning, everybody, and welcome to the USCDI Task Force. I am Mike Berry with ONC, and we all really appreciate you joining us today. I am going to open up our meeting today with roll call, and I will start with our co-chairs. Steven Lane?

Steven Lane

I am here. Good morning.

Michael Berry

Leslie Kelly Hall?

Leslie Kelly Hall

Good morning.

Michael Berry

Ricky Bloomfield?

Ricky Bloomfield

Good morning.

Michael Berry

Morning. Hans Buitendijk?

Hans Buitendijk

Here, with an echo, trying to fix it.

Michael Berry

Grace Cordovano?

Grace Cordovano

I am here. Good morning.

Michael Berry

Jim Jirjis? Ken Kawamoto? John Kilbourne?

John Kilbourne

Here.

Michael Berry

Les Lenert? Clem McDonald? Aaron Miri? Brett Oliver? Mark Savage?





Mark Savage

Good morning.

Michael Berry

Michelle Schreiber? Abby Sears?

Abby Sears

Good morning.

Michael Berry

Sasha TerMaat?

Sasha TerMaat

Good morning.

Michael Berry

Andrew Truscott?

Andrew Truscott

Good morning.

Michael Berry

Sheryl Turney is absent today, but she will be back next week. Dan Vreeman? And, finally, Denise Webb?

Denise Webb

Good morning.

Michael Berry

Good morning to all, and now I would like to turn it over to our co-chairs, Steven and Leslie. Thank you.

Past Meeting Notes & Review Draft Recommendations (00:01:42)

Steven Lane

Thank you so much, Mike, and thank you, everyone, for showing up this morning. We really appreciate it. We are in the final stretch of preparing our second draft of recommendations for the HITAC. We have this meeting and as many as two more to finalize those recommendations, which are going to be focused on Task 2 and what we are now calling Phase 2 of our work. If we could advance to the next slide, we can see that. Again, meeting notes are being posted to the web. If anyone has any trouble with those, let us know. But, we want to dig in deep on Task 2 here. We initially had decided we wanted to focus on 2B and C for our next set of recommendations, but I think last time, we threw in some work on 2A, spent some time digging into that, and developed a number of recommendations, and I believe, Leslie, unless you or others disagree, that we are hoping to include all of our Task 2 recommendations when we present to the HITAC next month.





Let's see. So, do we have AI? You are here, AI. We have a number of draft recommendations that we have put together into a Google doc, and I think what Katie told me, AI, was that we would have you bring up the Google doc and we would be able to look at it from there, so I think getting that up in the background would be good. Leslie, I think you and I can be responsible for editing on the fly if that seems appropriate as we go through that. We know that some of you definitely had a chance to go to the doc over the past few days to see what was posted and provide some input. I have actually gone ahead and just incorporated a number of those recommended changes to wording, and thank you in particular, Sasha and Mark, for making some really good suggestions, but I think what we would like to do is to go through...

The largest number of suggestions and I think the ones we have spent the least amount of time talking about have to do with Task 2A, improvements to the ONDEC system. Leslie, I feel that we could get through those relatively quickly this morning, and then probably turn our attention to Task 2B, the recommended changes to the evaluation criteria, where I think we have some meatier discussion, and then we will see how far we get. Does that suit people? Does anybody have a better plan for a meeting? Great, all right. How are we doing there, AI? Are you getting close?

AI Taylor

I thought I had it, but it looks like it is sharing the wrong screen. I am going to stop and restart. Hang on a second.

Steven Lane

No worries. I think we can just start talking through it. So, we tried to capture all the recommendations that came up in our prior discussion. For those of you who want to, I would invite you to open up the Google doc and follow along there as we go. There we go. Now you have got it, AI. Perfect. Maybe we can blow that up and focus on that first column. And, I will just walk through these one by one if that is okay with folks, just to get any input and see if we can approve these as we go.

So, the first set of recommendations are these general recommendations, and AI, I think you could even blow it up more and stay scrolled to the left. I want to respect the most mature amongst us here and the need to see this on the screen. So, there are recommendations to review all questions and to review the use of simple language. I do not think we need to go into greater detail about reading level or anything like that. We know already that ONC has expressed an interest in doing this, and I anticipate that they are already at work on that. Any questions about that one? Any comments? Feel free to raise your hand, and Leslie can watch for those.

The next one is for any yes/no questions to always include the option of "unknown." There was one question in there that did not have that as an option, and we noted that as an oversight. Provide options for submitters to request assistance or support in making their submission: I think this goes to a theme in our discussions thus far, which is that there is a hypothesis that there are people out there in the universe who would like to participate in this discussion, but feel limited or are limited by the technical requirements of having such discussion, or submitting information, or filling out fields, so the basic concept here is to make it as easy as possible for people to participate in the process, and the way we have captured that so far is to provide options for submitters to request assistance, such as use of chat, email, and/or interview with an ONC resource who could provide support in completing a submission. Grace, your hand is up.





Grace Cordovano

Yes. I think I left a comment for this, but it is not coming up, and it was really on the first point. The way that ONDEC reads right now, it is fairly straightforward and simple. I guess a clarification that I would like is for someone that is not really in the industry. So, simple language for a health IT vendor is really very different from simple language for a patient who just may not have that technical expertise. So, just to clarify that point.

Leslie Kelly Hall

Right. The words should be “plain language,” and we can do a reference to the Center for Plain Language, which gets to the actual construct of how to write, so I think that can be covered. Steven, what I suggest is that we go through all of 2A and then come back with questions. I will keep track of the order.

Steven Lane

Okay. I was thinking we would go through the general ones and get input before we went on to each of the subsequent sections, just as a thought.

Leslie Kelly Hall

Oh, you are going across, not down?

Steven Lane

No, I am going to go down. Absolutely. All right, no hands up. We suggest developing a primer and/or creating an addition to the HIT playbook to encourage nontraditional stakeholder participation and understanding of the USCDI, especially for patients and care partners. And then, providing tools to support greater public engagement, or what has been referred to as crowdsourcing: Social media app buttons. This was an idea that Leslie and I discussed at length, the idea that there would be buttons on the top of the USCDI landing page and the individual data class and element pages that would allow users, with a single click, to leverage their APIs to tweet or post to Facebook, et cetera, including the link to the page and the ability to add a comment out to those social media sites.

We also wanted to play with the idea of like or dislike buttons, such as thumbs up/thumbs down, and having the comment buttons up at the top of each page. We would not want people just spamming the site and randomly putting in a hundred likes or dislikes, but we would require the submitter to include information, such as name, affiliation, and email, with a suggestion, and having a comment button. So, today, if you want to make a comment, you have to scroll all the way to the bottom of the page under all the comments that have been submitted to find that. Having a comment button at the top of the page that basically just whisks you down there to an open comment field would be another benefit. So, those were all the general suggestions regarding ONDEC, and we are definitely interested in any feedback. Does anyone want to add to, subtract from, or modify? Otherwise, what we will do is try to take what we have gone through today and turn that into language for our transmittal letter. Give me at least a thumbs up, Mark.

Mark Savage

I added one suggestion in the chat about plain language for the general public, just to reference that is the broad stakeholder group, not specific stakeholder groups, if that is a useful suggestion. Thanks.

Steven Lane





Okay. I have captured that, or we have captured that. Leslie and I are both madly capturing. If you just scroll up a little bit, Al, and maybe refresh your screen, others who are following in the doc can see the changes that we have put in there. Is that comfortable? No concerns? Great. All right, let's go on to the next one down, registration. We are proposing suggesting removing the requirement that submitters register as an ISA user in order to submit data class elements, or comments, really. I think you have to be a registered user to submit a comment today as well. So, in removing that, obviously, there would need to be identification, such as name, affiliation, and email, perhaps, but not full registration. Al or others from ONC, I am particularly interested whether you have concerns about this. Obviously, your preference going in was to have full registration. Do you still feel that that is imperative, or do you think this might be a reasonable change?

Al Taylor

I think that we would have to look hard at the feasibility of unregistered access. I think the risk of spam is pretty high. We also want to be able to document the submissions. This is part of the transparency issue. We want to have some sort of ability to track and to be able to display who is commenting in following up with those commenters as well. I think it might be difficult.

Steven Lane

Okay. So, if you can scroll back down, Al, I just changed the language to “investigate removing the requirement.”

Al Taylor

Steven, is this in 2B?

Steven Lane

We are staying in the first column. We are working our way down through Task 2A. Okay. Next, we have some suggestions around submitter details. This was to invite submitters to specify their affiliation with one or more stakeholder groups, such as via a dropdown menu. This was a suggestion that we heard. And, to offer specific educational materials and/or an alternative path for questions or required fields for submitters identifying as a patient or care partner. Here, again, I think the idea here is that there may be people representing a patient community that perhaps are not as technically savvy or may not know the answers to some of the questions that are required.

I do not think we had specific recommendations here about required fields that should be made optional based on someone's identified stakeholder group. As we went through field by field, it seemed like the requirements were pretty reasonable, but again, I think this raises the level of sensitivity to inviting and supporting input from those who may not be as technically savvy. Grace, I know this is something you have really been championing.

Leslie Kelly Hall

I think we talked about a glossary at some point in time that would be available as well so that people understand what the words could mean.

Steven Lane

Okay, I am capturing that for the recommendation.





Grace Cordovano

Steven, this is Grace. It was really more when you talk about exchange and whether it is an exchange between two or three organizations or four or more organizations, [inaudible] [00:15:23] scale and production. It is more that that is not common knowledge, not just being technically savvy. I am not sure of the right way to address that, but that really was the reason for my suggestion.

Steven Lane

And, I do not know... I do not have the site up. Maybe someone can pull up the prep sheet. I do not believe that exchange between organizations was required.

Al Taylor

Yeah, it is, Steven. It is part of the maturity of exchange. It just says, "Is it being exchanged, yes or no? If yes, between how many different organizations and different systems?"

Steven Lane

So, let me add that.

Leslie Kelly Hall

You might also need to say what exchange means, to Grace's point. "Wait a minute, I exchange with my family all the time." So, I think the glossary of terms really needs to get to that level of specificity.

Steven Lane

Okay. I am capturing this.

Grace Cordovano

But, Leslie, I am not sure if a patient or someone from the general public needs to include that level of granularity. I agree that there could be a glossary, but once someone has a submission, any other of the members of the task force would be so savvy and knowledgeable that they could easily fill in the gaps. So, I think it is just trying to lower the barrier to entry to try to submit things that are necessary or valuable, and then, the task force is so great that we can easily piece in what is missing in the submission without making it more difficult for the person who goes to the glossary to try to populate it, if that makes sense.

Leslie Kelly Hall

Yeah, that makes sense. Thanks, Grace.

Steven Lane

Al, it seemed that refreshing kicked you back out and forced you to come back in. Is that right? Is refreshing something you can do?

Al Taylor

I am just not sure where we are at. Did it refresh?

Steven Lane





We are still under “submitter details.” There we go. So, again, we have made some modest changes in response to those suggestions. All right. No hands up? Let’s go down to the data element: The suggestion to allow for submitters to easily see when others have submitted on the same data element. This can be accomplished by a keyword search capability or an automated system that identifies words entered in the data element name or description and identifies other submissions with the same or similar words or concepts, I guess. Again, I do not know how practical this is given the web development tools available to ONC, but again, I think it expresses something that we have discussed here. Mark?

Mark Savage

Sorry, this goes back to the point about a glossary. I hope the emphasis is on making the language of the tool itself as accessible as possible. Not everybody is adept at going back and forth to a glossary for definitions.

Leslie Kelly Hall

I was thinking it could be a hyperlink. Just click that word and see what it is. But, I agree with you, Mark. The main emphasis should be simple, plain language.

Steven Lane

I am just capturing the concept of the hyperlink there in that recommendation. Good. All right. Under the use case section of the form, we suggested inviting the submission of patient stories, really illustrating the need for or value of the suggested data as well as descriptions and benefits of making the desired data more interoperable and/or harm as related to lack of interoperability. And then, finally, under “challenges,” we discussed here that the existence of challenges would not be detrimental to the advancement of the data class or element, and we felt that that should be explicitly stated in the form so as to not discourage submitters from identifying such challenges. Mark?

Leslie Kelly Hall

Mark?

Mark Savage

On use cases, I am wondering if submitters could include links to stories that might make it easier. I am also not sure if that creates more problems than it solves, but it is a way to get stories in that have been written up.

Al Taylor

Mark, that is always possible. That is still possible. We do not say what the format of the use case description is, but we do offer links to... You can do any link to anywhere, really, within that use case link, including project pages, and if you have a user story that is part of the project page, or even just some other web page that describes the use of the data, that is already there, and if we change it or add “user story” to the concept of “use case,” it is sort of synonymous, but that would allow people to put links in there already. It is already there.

Mark Savage

Thank you.





Steven Lane

I saw the comment that Hans put in, and I changed the box above to say “data class/element.” All right. So, these are our proposed recommendations for our Task 2A. I must say I think we have developed them rather quickly, and there are some really good ideas in there. Does anyone have any concerns before we move on to recommendations regarding Task 2B...2B or not 2B? All right. Let’s go on, then. This is exciting. We are going to get some work done today. I like this.

So, under Task 2B, again, Leslie and I tried to pull out and categorize the recommendations that came through our discussions and various people’s submissions. So, starting at the top, again, this is looking at the evaluation criteria that ONC will use to assign suggested data elements or classes to a level, again, those being comment, Level 1, or Level 2. So, here, the first captured suggestion was to modify the maturity and leveling majority comment within public documents so that those events and stakeholders will not stay in the margins as a result. Okay, let’s see. What are we trying to say here?

Leslie Kelly Hall

What we are trying to say is that...

Steven Lane

Oh, the use of the word “majority.”

Leslie Kelly Hall

Right, and I think we captured that in our edits below, Steven, but I do think that there needs to be some wordsmithing. I know Mark said to wait until we understand what we are doing in that one section. So, we will work on that, guys. I think we get the point, but we have not gotten the words quite right.

Steven Lane

Well, I think we will probably get down to that today. We could jump there now, or we could go through this list and come back to it. What is your preference?

Leslie Kelly Hall

Let’s go through the list.

Steven Lane

Go through the list, okay. With respect to both assigning levels, Task 2B, and prioritization for inclusion, Task 2C, ONC should consider and balance a broader range of factors such as health equity, disparities, priority use cases, underserved stakeholders, et cetera. Again, we will be getting into more detail about that recommendation, so I think these are both high-level comments that we captured here at the top. And then, I do not know if we are actually considering this, but there was a comment that if ONC plans to move up the deadline for submissions for V.3, to announce that as soon as possible. Al, did you make a comment to us that you were thinking of changing the deadline for V.3 submissions?

Al Taylor

Yeah. Currently, we have published the submission deadline to the October timeframe, but we are looking to move it up to sometime in September, probably mid-September.





Leslie Kelly Hall

When will that be known, AI?

AI Taylor

Pretty soon.

Leslie Kelly Hall

Okay, good.

Steven Lane

So, I think the suggestion here is as soon as that decision is made, we should get that out and tell that people to prepare for it. It seems self-evident, so I am not sure we need to include that in our recommendations to HITAC. We went on to say even with an announcement now, the deadline might occur sooner. The date is still unknown, but it could be more helpful than waiting until the actual date is chosen, so I guess that is relevant. AI, do you think you are going to finalize that decision very shortly, or do you think it would make sense to at least give people a heads-up that this may be coming?

AI Taylor

To finalize the announcement of the deadline move-up?

Steven Lane

Yeah. Do you think you will be making that decision in the next week or so, or do you think it will take longer?

AI Taylor

Possibly, yeah.

Steven Lane

So, I think the comment here is simply that if you anticipate that it is going to move up, even if you do not know the date, it would be best to state that publicly so that people are at least aware.

Leslie Kelly Hall

I think there is no harm in keeping it in our recommendations, Steven. It might prove redundant, but I think we can keep it in.

Steven Lane

Great, all right. Going down, in terms of the review, I think this is another significant recommendation: That the ONC perform annual or, preferably, semiannual review of all items submitted to ONDEC to validate the current level and priority based on existing information, as well as comments and the current criteria. Of course, we are talking about changing the leveling criteria slightly, so that alone could change what level things are in, but obviously, as AI has said, more information is coming in all the time, comments are coming in all the time, and it is not clear to me, AI... Have you guys actually changed the assigned level of any of the elements that have been submitted based on input at this point, or not?

AI Taylor





I do not know that we have. It is possible, as there have been one or two that that has happened to, and I am not clearly aware of anyone in particular, but it is possible.

Steven Lane

All right. So, here, again, I think the idea is to consider doing the re-leveling formally, at least on an annual basis, and ideally twice a year if resources allow. Any comments on that one? Mark suggested that ONC could use the task force as a sounding board for questions or items that do not fall neatly into a particular category. I think that is a nice offer. Again, I hope that we all have an opportunity to stick with this work over the next cycle. Any thoughts about this?

The next recommendation was to note the date of the most recent review within the website. Frankly, I would note the date of all reviews within the website, as well as the date and outcome. I think it is a way for those with an interest to follow the evolution of a submission as it moves along, so I am going to add that if no one objects. And then, we had a comment here to report to USCDI Task Force. I was not quite sure what that meant. Can anyone provide more detail?

Leslie Kelly Hall

That would be part of an annual review or the start of a cycle where ONC would present “Here is the leveling that has been done, and based on our review, we are changing the following data elements” or “Based upon our review, our existing leveling stands.” So, this would be the beginning of the cycle of review that would be reported to the task force.

Steven Lane

Okay. Any comments? Is everyone comfortable with these recommendations thus far?

Al Taylor

If I could, Steven, is that report different than when we present the charges like we did in January, when we presented draft V.2 along with the charges, prioritization criteria, and those sorts of things? Is that different than that presentation to the HITAC?

Steven Lane

I do not think so, but...

Leslie Kelly Hall

Yeah, I think it is the same kind of thing in that it happens at the same time. We are just asking you to say, “In fact, we have reviewed ONDEC; we see X amount of change as a result of that review and this amount of status quo.” So, it is a deliberate way to report back the outcome of your review.

Al Taylor

Okay, thanks.

Denise Webb

Steven, this is Denise. Let me just jump in. I know this recommendation we are putting forth is to come to the task force, but I think it really should come to the committee, and then...





Steven Lane

Okay, the HITAC?

Denise Webb

Yeah, because then, it comes to the committee, and then, if we go through the same process, it goes to the committee, and then the charges are put forth for the task force to deliberate on.

Steven Lane

That makes sense.

Leslie Kelly Hall

Thanks, Denise. That makes a lot of sense.

Denise Webb

No problem.

Steven Lane

All right. The next suggestion has to do with creating a dashboard for the USCDI, and I think we have an open question here as to whether this would be for the public or the internal use of ONC and the committees and task forces, but basically, being able to see the number of submissions within each level, the date and times since last review, the number of prioritized items within each level, and when we are going to get to what it means for an item to be prioritized, and the number of submissions at each level by stakeholder category. These were just what we thought, off the tops of our heads, might go into such a dashboard. If people have other suggestions, we can certainly capture them, as well as any thoughts on whether this should be public versus more for internal ONC use. Any thoughts?

Leslie Kelly Hall

Maybe we should leave some open-ended to create a dashboard. "Here are suggestions, but we also welcome ONC input." We seriously have not thought about everything except off the tops of our heads here.

Steven Lane

All right. Under "data elements," which is the last category within the evaluation criteria, we have "Within ONDEC, ONC should document and display its categorization of each item based on each criterion, as well as overall." So, again, you go in, you find something at Level 1, and you look at why it was placed at Level 1. And, as explanatory text, "This would help commenters and submitters provide more specific response and help to ONC and other members of the public."

Leslie Kelly Hall

This is really to address the concerns that were voiced by several of us. There might be disagreements between whether something has a standard or not or where that standard exists or not, and there might just be opportunity to then reflect or actually reinforce something with that level of detail. Hans, I think that was one of your points, and I see your hand is raised.

Hans Buitendijk





Correct, that is along those same lines, so that you have that insight, and particularly to this statement, it could also be at a data class level, where, for a class, there are, say, 10 elements in there that are in some stage of progression through the criteria, priority, maturity, or otherwise. It would be nice to be able to get that view of where everything is at that we are talking about in that data class, so it would not only look at data elements, but also the data class overall.

Leslie Kelly Hall

Thanks, Hans.

Steven Lane

Great, thank you. So, if it is okay with you, Leslie, let's dig into both the language on the use of the term "majority", and then, I think, needing to dig deeper into this differentiation of "maturity" versus "priority." Maybe we should go up and do the top of the third column first, on Task 2C, just go through this. By the way, I think Task 3, the column to the far right, which AI is not displaying, but you can all see online, is really... We are going to do that later. We are not focusing on this, but we did categorize some of our recommendations into that category for later attention. If anybody has looked at that and feels that any of those recommendations should be included in this current tranche, let us know, but we still have more work to do after we complete our Task 2.

So, Task 2C, of course, is the prioritization criteria. This is to say within a level... So, currently, this prioritization criteria has been seen by ONC as simply how they should select items from Level 2 for inclusion in the next draft version, and one of the things that we talked about is the notion that the leveling should be primarily based on maturity standards. Is this technically ready and able to be accessed, exchanged, and used? The prioritization could be used within any of the levels to identify items for particular attention by stakeholders, HL7, or others who want to see it matured and brought forward, but just because something is down at a comment level or Level 1 does not mean that it cannot be identified as high priority. But, in the context of Level 2, this prioritization would be used, again, to flag those items with the greatest need or desirability to bring them forward into the next version.

So, the way we have captured the comments so far is to separate criteria based on technical maturity, such as standards, implementation guides, testing, implementation, and use, from those based on nontechnical items, specifically related to addressing equities and disparities, underserved stakeholders, and priority use cases. I think we want to assure that true inclusion in USCDI and actually being put into a version meets minimum standards regarding technical maturity and readiness, and Hans and Sasha have given a lot of thought to this and can provide detailed discussion.

We felt that alignment with ONC certification and/or CMS initiatives should not be an absolute requirement. I think it is listed today as one of four requirements. I think the sense when you look at the ONC documentations is that those are "and" requirements and you need to meet all of them, but we felt that there may well be items that are worthy of advancement to USCDI, even if they have not yet been picked up by certification or CMS initiatives.

AI Taylor

Steven, if I could make a clarification, ONC does not hold the position that everything is must/and. There are degrees of priority given to things that meet any of those criteria, so it could be... They are likely to be





related, but whether something is in some other part of ONC certification or not is a plus, the development of standards is a plus, but it is not that it must be this, this, this, and this. I do not want people to think that those are all “must” requirements.

Steven Lane

Perfect, okay. So, just clarifying that. Since we were confused, chances are that submitters may be confused as well.

Leslie Kelly Hall

And then, Steven, I think we have language that we have inclusion in USCDI. Some might think, “Wait a minute. Does that mean it cannot be in comment, Level 1, or Level 2 unless there is a minimum?” So, in this case, “inclusion” means that it has advanced to USCDI from Level 2 or any other level. It requires some minimum degree of technical maturity. This is the conflict we have in that we do not want marginalized stakeholders or marginalized data classes always being marginal because they have not met the minimum standard, so we need to make sure that inclusion in the USCDI process is welcoming and inviting, and that that includes comment, Level 1, and Level 2, but that the actual advancement into USCDI has some minimum degree of technical maturity.

Now, I believe that addresses what is always on the fringe because we will be including it from ONDEC through to comment, Level 1, and Level 2, signaling to the industry that it needs standards. Under the leadership, for instance, that UCSF did with SDOH and others, that is really a great model of something that was aspirational, and by the time it aligned with USCDI, there was much in place. So, we should just be clear that we have ONDEC, comment, Level 1, Level 2, and then advancement into USCDI.

Steven Lane

We have a couple of hands up.

Leslie Kelly Hall

Clem and Hans have comments.

Steven Lane

Clem, do you want to go?

Clement McDonald

Yeah. So, I do not want to... I liked everything that Leslie said. I think that is a good point. I do want to be sure that we do not say you can put in garbage. No one knows how to say it, but we are just going to jam it in, and it will not be useful when it is received. There is one more criterion that would be nice to include: To give some priority to stuff that is already sitting in systems and sending it, such as not being too stingy on resources that have the fields in there already, or data such as eye pressure measurements/tonometry. I do not want to harp on it anymore, but these are not things that can require extra work on the part of the care system, so it would be nice if we at least give a little priority to stuff that is sitting out there and is not going to require manual entry.

Steven Lane





So, Clem, the leveling criteria takes into consideration current use in systems. That is actually part of the leveling criteria already. That has been one of the core principles of the leveling criteria for a while.

Clement McDonald

That is good, but I would just like to clarify a little bit and tweak the wording that these are data that are already being collected but not are in current use in systems. That is right, and I like that, but it is not as precise, or maybe it does not shade it the right way that this is in systems now, and it is not a matter of new manual data collection. I may be going too far, so, AI, you just decide. You guys are doing a good job. Let me retract all that.

AI Taylor

We are going to stick to the stingy part.

Steven Lane

Clem, you have said this many times before, and I do think the “stingy” comment is an important point. I attempted to just capture some of that language, and AI is showing it here on the right-hand column. “Prioritize data classes/elements that are generated automatically and/or collected routinely and exist within HIT systems now.” Is that kind of getting at what you were saying?

Clement McDonald

That is gorgeous, Steve. Let’s go with that.

Steven Lane

I was just quoting you, Clem.

Clement McDonald

You said it very well.

AI Taylor

What this bullet says aligns with the prioritization criteria of minimum implementation burden or development burden, so, because there is no redesign, there is no design required for something that is already in there. Presumably, it is associated with standards. To Clem’s comment about... I do not want to repeat the garbage comment, but I think that what you were getting at, Clem, is that garbage, in a sense, is something unrepresented by technology standards, but that is incorporated into the prioritization criteria as well as the leveling criteria, so if it is an easy lift, it would be considered more than something else that would be harder to implement.

Leslie Kelly Hall

And, we have a comment from Hans, and then Abby. Hans?

Hans Buitendijk

Thank you. I have a question for AI along the lines of the comment on the second bullet, that there is not an absolute requirement for those initiatives. There seems to be a potential friction between the text that is highlighted in yellow right now and has a comment to it, that USCDI requires a minimum degree of technical maturity and readiness, and then that second bullet. AI, from your perspective, do you see a potential





conflict between the two where something could be in USCDI for which there is not sufficient technical support there, or are you okay with that, but it is just the certification part that is being highlighted, that there need not be certification criteria immediately in play for it?

Al Taylor

I think the very last part that you said, that there need not necessarily be ONC certification criteria that covers the data element for consideration... The highlighted part really points to some of the minimum criteria for Level 2. The level 2 criteria requires that it be either represented using clear terminology standards or have implementation guide inclusion. So, that is really the minimum requirement for Level 2, plus the other things that also need to be in place for Level 2. This is really more of an evaluation criteria, although if the question is if we should require Level 2 to be considered for USCDI, I think that should be explicitly stated, but that is not the case.

Steven Lane

Yeah. I think that is a really important point, Al, and I think it goes to a key issue that we need to grapple with, which is that USCDI Version 1 includes a number of data classes and elements that really do not have great standards, that are grandfathered in. I think that we as a task force, HITAC, and ONC need to take a position as to whether actual advancement will require a minimum standard going forward, even though there are items that are in there today that do not meet that minimum standard. My personal opinion is that we should, that we owe it to the stakeholders and the industry to advance new classes and elements that really are ready for exchange, and then to go back and do the hard work to identify and specify the standards that support those things that do not have them, and I think we covered that in our first round of recommendations.

But, Al, I think what you are asking is if something needs to meet the maturity criteria of Level 2 to be put forward or if something that is prioritized based on other factors be put forward, and again, I am going to ask Sasha and Hans to take the mic here in a moment, I want to really differentiate what it means to put something into a draft version from what it means for something to be put into a final version because there is a good six-month separation between draft and final, and work can be done during those six months, so I think putting forward things that are almost there in a draft version, but then saying they are going to make it over the hump to final if and only if the IG is completed, the balloting is done, et cetera, is a question that we really need to grapple with. If I may, I would like to ask Sasha and Hans to bring forward and articulate their thoughts, which I think represent EHRA's discussion of this.

Hans Buitendijk

Steven, if I may, just before that, I had one follow-up question for Al on the prior topic, and I will come back for the rest as well, and that is consideration of clarifying the alignment, whether the USCDI is in line for the next SVAP or whether it is in line for the next regulatory update. I am not sure what some thoughts around the answer might be, but that probably will influence as well what can go into USCDI based on the fact that the next SVAP is going to come out and whether we will have an entirely new regulatory round where you can add new standards, levels, or all kinds of other things that are just more open, so that will be one other consideration there.

Leslie Kelly Hall

Hans, can you tell me the acronym you used? I did not hear it.





Hans Buitendijk

Sorry. The SVAP is the Standards Version Advancement Process, and there are some criteria as to what can or cannot be included in there as we currently understand it. Maybe that understanding is not totally right, but it is a yearly process, and every X number of years, there is a potential regulatory update where the floor, if you will, is being raised, where you can include more new materials that, in an SVAP, there are some limitations. So, the question is that we also need to consider, depending on the phase that we are in, are we looking at the next step with USCDI that it could go into an SVAP, which is possibly a different consideration than the next step is a USCDI that can go into the next regulatory round. So, any insight would be helpful there to understand that and make it part of our considerations.

Steven Lane

Thanks, Hans.

Leslie Kelly Hall

So, would your recommendation be that ONC can help to provide guidance on the relationship between the SVAP process and the USCDI process? Is that your recommendation?

Hans Buitendijk

Effectively, to have clarity whether the proposed enhancements and updates qualify for SVAP, qualify for a regulatory update, or whether there is no difference. We think there is, but there might not be.

Steven Lane

Hans, before AI answers, I would just say that my assumption has always been that that is really what USCDI is about. There is this natural progression from USCDI to inclusion in SVAP to inclusion in future rulemaking that, to me, it does not make any sense to bring anything forward into USCDI that does not meet the qualifications for SVAP and/or regulation. This was meant to be a progressive process. So, I will let AI answer.

Hans Buitendijk

I completely agree with you, Steven, that is progressive in that regard, but the criteria for what might develop for an SVAP round versus a regulatory round are understood to be different, at least by some communities, and if that is the case, that needs to be clear. If that is not the case, it needs to be clear too.

AI Taylor

Let me try and answer that, Hans. I think the approach that we are trying to project is that the versioning process for USCDI is most closely related to the SVAP cycle, so we are going to come up with a final Version 2 this summer, we are going to look at it and see if it is appropriate to be considered for SVAP, which will come out next January, and if that is the case, then developers can voluntarily update their systems and provide it to their customers. So, we do that once, twice, three times, and we are coming around for a proposed rulemaking cycle. We could do one of several things for a proposed rulemaking cycle. When we issue an NPRM, that is the signal that we are looking at adopting a certain version of USCDI, so, most likely, it would be the most recent USCDI version that was published and/or SVAP, if that makes sense. But, we could also propose changes through the rulemaking process that could be different





than the regular USCDI update cycle, but we would signal the intent to include something in a rule just by putting it in the NPRM, not by teeing it up for the SVAP cycle.

Hans Buitendijk

I appreciate that clarity. It is more that it needs to be understood by the community that as they see items progress through USCDI levels and criteria, et cetera, that it is understood as to why something did not get into SVAP, but could have gone into regulation, but there is clarity and transparency to those criteria because that is not very clearly understood in the community that we deal with.

Al Taylor

We really are making an effort to very carefully consider additional data elements in a version of USCDI, similar to the way we think about how this would play if we were to propose it in an NPRM. We are really looking at it from the same level of seriousness, and we would like for each version to be sequentially updated in systems. Although it is voluntary, we would like for that, but we would not want to have somebody update one, two, three cycles of USCDI versioning only to have the NPRM undo a lot of that. We do not want to convey that. We are not thinking along those lines. We think that each update could very well be included in the next rule.

Hans Buitendijk

Thank you. That helps.

Steven Lane

Abby, I know you had your hand up for a while, but you took it down. Was there something you wanted to toss into the discussion at this point, or should it wait until after Hans and Sasha take the floor?

Abby Sears

It can wait.

Steven Lane

Okay, sorry. Mark, does your comment fit right here?

Mark Savage

I think so, and it is short. I just want to throw out that from my perspective working on social determinants of health, I see a whole range of different deadlines from different coding stewards taking submissions, and how long they take to consider and to approve, and then it can go on to the next step, and these different timelines do not necessarily line up easily. It brings me back to this appreciation for some degree of discretion/nuance in the decision-maker to try to balance all of that and do a gut check about whether it is ready to move forward rather than having bright lines when you see how all these different pieces do or sometimes do not quite align. It is just a general comment. Thank you.

Abby Sears

Steven, I was going to wait, but I think I do want to piggyback off of what Mark said. I do not know if I could say it better, but the fact of the matter is I understand what we are talking about and the importance of the rigor of the process, but I also want to say that in the field, no one is asking for that level of rigor, and they are making requirements and demands on data capturing that are outside of the process we are talking





about at our level, and they do not really care about the duplicative nature of the manual entry and their requiring it. So, I hear what Clem is saying around not adding more manual burden to providers, but it is already happening, so I think that ship has sailed. So, whether we want to... I love the idea of not adding more burden to the providers, but it is already happening, so how do we match the industry and the expectations from public entities that are already expecting more than what our process is allowing us to deliver with the rigor that we are trying to accomplish? I think there is a disconnect for me around the process and what the expectations in the field are for those of us that are capturing the data.

Leslie Kelly Hall

Abby, I think you have brought this up a lot, and it brings to mind some sort of rapid-cycle development that could potentially be part of this process. So, when an organization that represents exchange to a high degree/level that is already seeing something elevated that the lack of consistent description and standard is actually creating chaos and creating difficulty, it is a form of...it is a cluster. So, could we potentially make a suggestion for a rapid-cycle exclusion process that, when there is something that has high potential for future harm, that be considered? I think your example was on SDOH before, and people are asking all around, and I have to adhere to all these different requests. Perhaps this idea of a rapid-cycle process could be introduced. Is that something that would address your concerns?

Abby Sears

I think something like that would, and I would say that... Actually, I really like that suggestion. Let me give you another example that we had at our task force meeting last week: Occupation. So, whether we are ready to talk about occupation or put it into the USCDI, they're expecting occupation to be captured in some places, so I love the way you framed... I know we are trying to manage the chaos, but the chaos already exists, and if we do not get ahead of it and start to organize the chaos, it actually is going to produce data that we are going to be reporting on that is actually not as effective, and the fact that, as a country, our social services and our mental health services were left behind in the AURA money and in the AURA goals from 2010. We are playing catch-up, and the country needs us to go faster in those areas because the connectedness and intersection of our system to social services/mental health services is where the crux of a lot of the issues that are happening is. So, I like the idea of designing a rapid-cycle.

Sasha TerMaat

This is Sasha. Can I add on?

Leslie Kelly Hall

Who is that?

Sasha TerMaat

Sasha. I can get in line if there are hands up.

Steven Lane

There are no hands up.

Denise Webb

This is Denise, and I would like to get in on this conversation as well.





Leslie Kelly Hall

Let's start with Sasha, then go to Denise. Sasha?

Sasha TerMaat

Thanks again. This is Sasha, and I think that Abby's point actually ties into the conversations that I know Hans and I have been having with others in the industry about why we really need to emphasize the prioritization for standards work separately from the maturity for inclusion in USCDI. The challenge is that when a standard is in flux, we need that rapid cycle of iteration to say, "Oh, here is the list of 20 occupations we want to use; no, we actually need a different list of 50; now we want to have 100 and map them to these five categories," and that often involves a lot of flux as we figure out what the most effective approach is. But, the certification process, which is, of course, what we are aiming for with USCDI and the Standards Version Advancement Process, actually prohibits that type of flux. It locks us into a particular standard until, I guess, at minimum, the following year with a new Standards Version Advancement Process edition of the USCDI. And so, one of the consequences of prematurely putting something into USCDI could be to inhibit that very rapid, iterative cycle of figuring out the best way that I think we all agree is so important.

Leslie Kelly Hall

I am going to write a draft bullet in the column to the right for V.3 for consideration.

Steven Lane

Denise, did you want to comment? I know she is in transit, so she may not be able to follow. Okay. So, I keep advertising some input from Sasha and Hans, which Leslie is going to copy into the bottom of our Google doc, so, Al, if you wanted to scroll down to the bottom, and if either or both of you would like to walk the task force through this...

Hans Buitendijk

Sasha, do you want to start with where you went with the priorities for inclusion?

Steven Lane

The very bottom. Almost there, Al. Keep going.

Sasha TerMaat

Sure. So, just to kick off with some framing, and then I will let Hans go into more of the details that he has pulled together, as we were talking about with that example of oscillation, and when do we have something that is stable enough to be effective in USCDI and in certification and to not have the freezing effect of USCDI and certification be problematic? I think that is part of why I would suggest separating out that this is a real priority for the industry, which might change rapidly based on any number of factors, and could incorporate all of the considerations around patient experience, equity, outcomes, and so forth. From a more objective assessment of the standards maturity, which I think we will need to have as a threshold to reach before we will have something be effective in USCDI, I think we have, one on side, if we include something immature, the "freezing on something bad" consequence, which would be undesirable for all the stakeholders.

The other consequence we will have is that if we put into USCDI Version 3 something that is immature, we might have a whole freezeout of USCDI Version 3 if the uncertainty about one inclusion in it causes folks





to hold off on implementation because they are not ready to go through a Standards Version Advancement Process as they wait for that standard, and that would also, of course, be undesirable for our interoperability goals, which is part of why Hans and I make the recommendations we do.

Denise Webb

Leslie, this is Denise.

Steven Lane

Oh, good, you are back. Al, before we go on, can you scroll up a little bit to the top of this section just so that we can get the beginning of their comments? Scroll up about a page. There we go, perfect. Thank you. Sorry, go ahead, Denise.

Denise Webb

Sorry, I lost my signal. I got dropped right when I think you guys were going to call on me. So, I just wanted to share that I am presently working at an organization that is a federally designated hemophilia treatment center, and those are all over the United States, and they do have to comply with certain federal guidelines and so forth, but it is a perfect example of a subspecialty where they have some very significant data needs, and they have a national association, and what I have witnessed is they basically have us copy over what is in the EMR to the national registry, called Clinical Manager, so they can then extract the data for clinical trial study managers, and the national organization is not paying attention at all to what is going on with USCDI, and they are actually expecting these hemophilia treatment centers to do things that are nonstandard to get data into their registry.

So, I just want to piggyback on what Abby and others said, that that horse is out of the barn, and they are putting a tremendous burden on healthcare organizations. The iterative, rapid-cycle process is a great suggestion and proposal, but we have to get these organizations that are doing this data collection to start paying attention somehow to working within standards.

Leslie Kelly Hall

Denise, I echo that too. Registries are so inconsistent, even within the same disease group. I am sure Grace has seen this as well, and that all of us have in some degree. So, perhaps that is a general recommendation for V.3 and beyond. How do we encourage inclusion of registries and education for registries? Because it is big deal, and I think COVID highlighted some of the inconsistencies that we have, but these esoteric areas can mean life and death for patients, and yet, the data standardization is not there.

Denise Webb

Right, absolutely. We are having to do manual data entry to get them our data, and that is crazy.

Steven Lane

So, I guess that goes back to the question that we were grappling with a little earlier, which is should items that advance to USCDI need minimum data standards in terms of maturity in order to cross the line, or are there situations, whether it is already in use and creating havoc or the various other prioritization elements that we have identified, that it should allow certain items to advance even in the absence of technical maturity. I think that is a real core question that certainly ONC is going to have to grapple with, but I think





we should come up with a crisp answer to that in our recommendations to HITAC so that that can be considered by ONC.

Hans Buitendijk

That is an important part because what we are also trying to achieve, which Sasha alluded to already in some of the comments, is that if we do not have a sufficient reference to standards in place, what kind of friction is that going to create, and as a result, what kind of likelihood will that have in adoption sooner rather than later until we have those standards to reduce the friction, whether because the friction is because we now can have different choices of how we interact so we are not aligning between parties, but are going off on different paths. There are implications for USCDI to demonstrate that you support it. You must support certain standards, but these new ones are not part of it, or the ones that are not included are not part of it, so how do you do that?

So, there is a whole slew of questions that would have to be addressed to clarify what that is, whereas if our intent is that we are improving and expanding interoperability with the least amount of friction moving forward, then from a USCDI perspective, that is one of the key reasons why, in some of the notes that you see there and that everybody can read through, we are looking at tying that more closely together, if it is not already there, to make sure that we have a clear, clean process by which we can all move forward on the same path [inaudible] [01:11:59] interoperability. But, it is a balancing act. I am not going to disagree with that.

Steven Lane

Hans, do you want to walk us through some of the specifics that you put in your comments?

Hans Buitendijk

Sure, and Sasha, just jump in if I miss something here or there. So, Sasha already highlighted the first one on priority versus maturity, and these are some examples that we put in there. Are they more of a priority statement versus a maturity statement? If we can keep them separate, it makes it easier to understand what should drive us to move forward and rally the community around because it is important, particularly where there is not enough maturity around the standards. What do we need to do? On the distinguished vocabulary versus technical, we have had a number of conversations around that as well, so we have put some things in here just to pull it all together.

But, having just vocabulary standards is not necessarily sufficient. In some areas, it might be because the underlying standards implementation guide is already there, it is just additional vocabulary. In other cases, vocabulary alone is not enough, so we need to make sure that we always keep in mind that the USCDI pointing to vocabulary standards does not mean that it is then implementable. In some cases, it does. In other cases, it does not.

And, we talked sufficiently, I think, about how the data class in the USCDI must have support with the technical standards. That goes back to what we just mentioned as well. If you want to scroll down a little bit further to a part that we have not talked much about in this context, really clarify that as we have the distinction between priority and maturity, there is the point in time now that we are assessing something for a draft, and there is something a year from now that the priority and the maturity may have changed. So, today, the priority might be high, but the maturity is low. We agree that the priority is sufficiently high that





we need to rally the community around what we can do in the next six months to a year to get the maturity up, and then, a year from now, we measure it, and it is higher, and it is high enough to get in.

So, I think we need to think about these concepts not only at the time of submission, though clearly, it is helpful to understand as a starting point, but we need to keep track of both of them over time so that it can inform us what is good enough to put in a draft, what is good enough to put in the actual published version, what is good enough to not put in a draft, but focus our attention so that the community can do the work so that in a targeted period of time or otherwise, it has reached enough maturity, particularly if the priority is high. So, we believe that by keeping distinction between priority and maturity and keeping in mind the now and the next and the progression over time, it adds an important time of managing and driving this road map that we are all putting together.

So, if we look at the next one, “Is that aligned with ONC certification and CMS initiatives?”, there could be the recommendation that it is aligned with the CMS initiative, but it is not in certification criteria yet, just having that awareness of what is happening and where that sits. This is not saying that it must be in certification, it is just recognizing the state, whether it is in there or not, and how that works. So, that is just to have more insight and clarity, and in part, it also goes back to what can go into SVAP and what cannot go into SVAP based on some of those criteria that are in play that can help understand why or why not something is progressing or why we should or should not be looking at something.

Modest technical standard development is that if there is not the minimum standard, it is going to be challenged. If it is modest, we really should be very close to the finish line or it should indeed be modest because we are looking at yearly cycles if it is in the SVAP timeline so that if it is a large jump, standards are there, initial maturity looks good, but it is for a substantial number of parties and big efforts to get it up the developer, by the provider, and by the community to put it in place. Then, are we going to have the value of that ongoing progression, or are we really still ending up bunching everything up until the next phase so there will be a lot of work to be done all at once.

So, we need a clear balancing act on what is modest. I am not sure we have a good answer to say what is modest and what is a lot, but we clearly have to look out for that when we look at the SVAP cycle in particular because it comes out by the end of the year, perhaps January of the next year, as happened with the first time, so let’s say it comes out on January 1. Now, it is active until the next January. When will people and the organization actually have the chance to take that on, roll it out, and get ready for the next year’s SVAP and keep on cycling through that? So, that is a balance we have to find out: What is modest enough and what is aggressive enough to get into that space? So, that one probably needs a little bit more work to get insight into how much work we actually think is needed.

In the next statement, there was the notion in that section of modest aggregate lift for vendor, but the term “expanded” was used, so that was more pointing out that it is a bit of an ambiguous term. How does it relate? It could be more widely interpreted than “modest.” We still know there is a challenge with how big “modest” is, but if the term would [inaudible] [01:18:45] be “modest in sync,” then I think it would align better.

Al Taylor

Hans, can I [inaudible – crosstalk].





Hans Buitendijk

What? Sorry.

Al Taylor

So, where was the term “expanded” used? I am not familiar with that.

Hans Buitendijk

If you go up to the orange-colored tables, under the header “modest aggregate lift for vendor development implementation,” in that section, there was wording that had the term “expanded” in it.

Steven Lane

Ah, here it is. It says, “Data functionality and interoperability exists or can be expanded. Efforts are under way or projected, and use case is prevalent.”

Leslie Kelly Hall

This is where we were trying to capture Clem’s comment that it is a note and we already know how to do notes, so let’s add an op note, let’s add a path note, let’s add a coroner report. That is what I was trying to capture there.

Hans Buitendijk

I still think that would fall under “modest” at that point in time if it falls within that in order to achieve that. If there is a standard, there is an adjustment, it is an addition of a number of things that everybody is kind of already doing, then it is modest. “Expanded” seemed to potentially imply that it could be a good chunk of work.

Leslie Kelly Hall

Clem has a comment, but then I think we have public comment, right?

Steven Lane

Go ahead.

Clement McDonald

I wanted to reinforce that yes, we should not have to create new requests for things which are contained in a class and we have already accepted, but on the other hand, as I hear all of this, I do not think it makes any sense that we can deal with such a complicated set of rules, and we are going to have to fall back to some human judgment somewhere along here, and the more we dissect it and always separate it in separate pieces, the less people will be able to fairly apply it, I think. I think we have to be careful about over-granular rules.

Steven Lane

Thanks, Clem. Let’s go to public comment now. This has been a very good discussion. The co-chairs have invited Hans and Sasha to work with us on developing some specific language for recommendations coming out of this discussion, which we hope to have back by next week. So, public comment?





Public Comment (01:21:13)

Michael Berry

Great. Operator, can we open up the line for public comment?

Operator

Yes. If you would like to make a public comment, please press *1 on your telephone keypad. A confirmation tone will indicate your line is in the question queue. You may press *2 if you would like to remove your comment from the queue, and for participants using speaker equipment, it may be necessary to pick up the handset before pressing *. One moment while we poll for comments. There are no comments at this time.

Steven Lane

Thank you very much, operator. So, in the last five minutes, I think really, we have done great work today. We went through and reviewed, modified, and improved our recommendations around Task 2A and 2B. I think that we still have some work to do to really articulate more clearly what we are talking about with regard to the differentiation between technical maturity and other priorities so that those recommendations can be really crisp when they come forward.

I am still feeling like we have not declared ourselves with regard to this notion of including items in a published USCDI version that do not need minimum technical/maturity standards. I think we have acknowledged that there are items in USCDI Version 1 that do not meet these strict criteria, the grandfathered-in, and I think that there are some voices suggesting that we might add additional items in a future version that go into this that do not meet the standards criteria, and I think there are other voices that are suggesting that everything that we add from Version 2 forward should meet the technical standards criteria, and that there would be benefits or burdens regardless of which choice was made. So, I would just be interested in the last couple of minutes as to whether anyone would like to specifically state their opinion one way or the other. Should “substandard” classes or elements be included in a special category, or should everything going forward meet technical maturity standards as a way to allow the industry to embrace these and move them forward in a more meaningful way. Mark?

Mark Savage

Just to repeat what I have said before, I think it is the “totality of the circumstances” approach. Maturity is important, other things are important, and that is why I did the presentation on the advanced health models and meaningful use approach of considering those factors together and trying to balance...

Steven Lane

Leaving it gray and leaving it up to ONC to make the call based on that totality as opposed to specifically specifying a set of technical standards from an HL7 and use perspective that must be met.

Mark Savage

I would put it a little differently. Avoiding the chaos and harm of having a bright line that important things are not yet able to cross because it is a bright line, but everybody needs it.

Steven Lane

Michelle?





Michelle Schreiber

I guess I would favor having a separate category. I actually think that what we put into USCDI should have enough technical standards that people can follow and can do it, but I know, because I am one of the people who recommends some of these things, that there are going to be times when the public or agencies want certain things that do not have those specifications in it, and I just think that is a separate category that we would consider those things on a case-by-case basis, but to really get into the USCDI, I think they should meet the technical standards criteria.

Steven Lane

So, when you say “separate category,” you mean separate outside of USCDI as opposed to separate within USCDI?

Michelle Schreiber

Yeah, it may have to be separate outside of USCDI, or one of these agencies, because one of the things I am still frankly not hearing in the USCDI conversation is what is the long-term vision? Is this all-encompassing, or is the narrow focus of certain topics that we have to be very careful about? And yet, we are going to build off agencies or subgroups or something like that.

Steven Lane

Thank you, Michelle. You got the last word. Thank you, everyone, for your participation today. We look forward to seeing you next week.

Adjourn (01:26:33)

