

ONC Proposed Interoperability Standards Measurement Framework

Comments and Question Responses – Combined Submission

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Commenters

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General Comments

- In order to create a meaningful dataset from the process proposed in the framework, ONC will need to be responsible for compiling a compendium of standards; ideally classifying them into a "Vocabulary/Content/Transport" taxonomy and also adding a category for "Security" (which would include encryption, authentication, etc.). However, please see the response to question #4, below, detailing how the standards taxonomy proposed may need to be modified.
- ONC should consider producing a formal annual "report" based on the data collection process, published back to stakeholders, as a way to encourage participation in the voluntary reporting process.

Question Responses

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?

Answer: A voluntary reporting system in combination with mandatory data capture levers would be the best approach to collecting the information proposed in this framework.

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

Answer: There are three ways that ONC could enhance the proposed data capture methods outlined in the framework:

1. As suggested, partner with industry by selecting a survey organization – JD Power, HIMSS Analytics, etc. that presents either as least bias as practical or at least known bias. ONC could also consider an effort to collate results from various existing industry surveys across the sector and write an analysis report on the trends.
2. Work with HIE/HIO convening organizations such as SHIEC, CAHIE, and NYeC to develop measurement frameworks that are relevant to their stakeholders.

These organizations could provide avenues for more granular measurement and data-capture methodologies that would provide detailed insight into specific markets.

3. In addition to voluntary collection methods, ONC should consider mandatory reporting on relevant standards implemented at the EHR-level through data capture as a part of the EHR certification process. While many of the standards may not be required for EHR certification, this process will serve as a more reliable data reporting backbone than voluntary reporting initially will, and will provide ONC with a process to collect data on potential future certification metrics for EHR vendors (similar to a “learning metric” as used in quality reporting programs).

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?

Answer: Not as it stands. Please see our response to question #4, below.

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

Answer: The proposed measurement framework could be improved in the following areas:

1. The proposed taxonomy of “Vocabulary/Content/Transport” does not necessarily map to existing taxonomies classifying HIT data interactions. For example, many sources would include the concept of “Syntax” which could either span, or further define the concepts of vocabulary and content. ONC should utilize a peer reviewed taxonomy rather than creating one that is specific to this framework.
2. ONC should consider adding the concept of “Security” to its taxonomy. Issues of data security, while always important in the HIT landscape, are continuing to come to the forefront. In addition, implementation of specific PKI infrastructure standards, SSO implementation standards, and many others directly impact the capacity to meaningfully exchange data between trading partners. Implementations of security standards are frequently a factor in modifying the expected performance and/or use of other standards, especially in terms of transport/transmission. Please see our response to question #10 for more detail on this general concept.
3. As noted in proposed framework, some standards will be more appropriate to measure based on “Use” whereas others will be more appropriate based on number of implementations. ONC should determine which measurement category each individual measure falls into when developing the initial compendium of standards (please also see our general comment on this item).
4. For standards where measurement of use is more appropriate, ONC will need to define exactly what use means for that specific standard. Definitions of what a transaction entails is disputed even for simpler

standards such as Direct. ONC should work with framework stewards such as HL7, Direct Trust, NIST, NATE and others where possible to set these definitions in a consensus-driven, transparent manner.

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

Answer: See response to questions #2 and #4, above.

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?

Answer: There will be significant variation in the capacity of data stewards to measure these factors. In addition to approaches outlined in our response to question #2, we recommend making funds available for innovation grants for these organizations to develop measurement capabilities and/or tools that can be potentially expanded for use more broadly.

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?

Answer: For this topic, and given the overhead of collection, this frequency is perhaps the best. Please also see our general comment on the publishing of a formal annual report.

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?

Answer: We recommend that ONC set up a working group, determine which standards are key, determine which standards lead to the most objective and transparent metrics, ask for input from industry, initiate a polling methodology from industry, and set up a process to review outcomes and adjust if possible.

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?

Answer: Please see our response to question #8, above.

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

Answer: The issue identified in the framework document around customization of measures is somewhat problematic. Often, the core issue is not that standards themselves are customized,

but that the environment in which standards are deployed in the field differs substantially enough from a laboratory environment that the standards do not work as intended or expected. The framework as proposed does not take this implementation lifecycle approach into account. One of the most important data-points to capture would be factors involved in standards implementation that affect how a given standard operates. We recommend partnering with industry to understand how various standards are affected by these external factors – perhaps assigning a sensitivity variable to standards that are known to be more affected than others in the compendium that ONC develops to guide the data collection process (see our general comment on this proposed compendium).