Interoperability Matters
Public Advisory Forum
9/22/2020

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Agenda

- Information Blocking Workgroup Update

- Information Blocking Boot Camp Update

- Recap of July Leadership Council Information Blocking Discussion

- Interim Final Rule on Information Blocking Revised Compliance and Enforcement Date

- Interoperability Matters Data Quality Work Group

The Sequoia Project's Members

New Members – Welcome!

- Apervita
- Audacious Inquiry
- CalHIPSO
- Hawaii HIE
- Health InfoNet
- Cureous Innovations
- North Carolina Health Information Exchange Authority (NCHIEA)
- Skagit Regional Healthcare

Information Blocking Workgroup
Phase 3

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Information Blocking Workgroup Representatives

Associations and Orgs - health IT community
- Anne Kimbol, HITRUST Alliance
- Jeff Coughlin, HIMSS
- Lauren Riplinger, AHIMA
- Scott Stuewe, DirectTrust
- Samantha Burch, AHA
- Jeff Smith, AMIA
- Matt Reid, AMA
- Mari Savickis, CHIME
- Paul Uhrig, The Commons Project, Co-Chair

Consumers
- Ryan Howells, CARIN Alliance
- Deven McGraw, Ciitizen

Health Information Networks and Service Providers
- Melissa Soliz, Missouri Health Connect
- Dave Cassel, Carequality
- Ammon Fillmore, Indiana Health Information Exchange

Healthcare Providers / Physicians
- David Camitta, CommonSpirit, Co-Chair
- Eric Liederman, Kaiser Permanente

Payers
- Nancy Beavin, Humana
- Danielle Lloyd, AHIP
- Matthew Schuller, BCBSA

Public Health
- John Loonsk, APHL

Developers
- Cherie Holmes-Henry, EHRA/NextGen
- Noah Nuechterlein, Epic
- Josh Mast, Cerner
- Jennifer Stoll, OCHIN
- Micky Tripathi, Arcadia.io
- Rita Bowen, MROCorp

Consultant
- Brian Ahier, MITRE Corporation

Federal Government
- Steve Bounds, SSA

Phase 3 Priorities

❑ Review ONC Final Rule

❑ Seek sub-regulatory guidance from HHS (ONC/OIG)

❑ Seek questions from public via a dedicated email box— aggregate and submit to HHS/OIG and ONC

❑ Address consumer/patient need for clarity re: information blocking

❑ Identify/develop priority scenarios—work with agencies on clarity

❑ Provide implementation guidance and resource materials

Information Blocking Workgroup: Agenda—Phase 3

- ✓ Meeting #11 (1/10/2020)
- ✓ Meeting #12 (3/20/2020)
- ✓ Members-Only Webinar on Final Rules (3/25/2020)
- ✓ Public Webinar on Final Rules (3/31/2020)
- ✓ Meeting #13 (4/10/2020)
- ✓ Public Webinar: Extended Q&A (4/17/2020)
- ✓ Meeting #14 (5/8/2020)
- ✓ Public Webinar (6/11/2020)
- ✓ Meeting #15 (6/12/2020)
- ✓ Meeting #16 (7/10/2020)
- ✓ Public Webinar (7/23/2020)
- ✓ Meeting #17 (8/14/2020)
- ✓ Meeting #18 (9/11/2020)
- • Meetings through end of 2020

Phase 3 Activities To-Date

- • Review Phase 2 deliverables
- • Plan for Phase 3
- • Review ONC Final Rule
- • Begin implementation planning
- • ID priority questions on Final Rule
- • Review enforcement discretion and OIG Proposed Rule
- • Provide suggestions for compliance and implementation plans and resources
- • Review industry readiness

Focus on implementation and compliance implications of ONC Final Rule.

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Information Blocking Workgroup: The Balance of 2020

September
- View from the Field
- Identify priority issues for ONC clarification

October
- OIG and Provider rules as available
- Group discussion: final preparations for compliance and enforcement
- Status of developer preparedness for ONC deadlines and implications for other Actors and non-Actors
- Needed communications with ONC/OIG

November
- Status post-November 2 and needed communications with ONC and OIG

December
- Status post-November

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Information Blocking Resources and Boot Camp

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Information Blocking Compliance Support: Tools & Training

Resource Center – Most Popular Page On Our Website!

- Features education, check lists, webinars, and more from The Sequoia Project and its partners

- Free to the public

- https://sequoiaproject.org/resources/information-blocking/

Boot Camp

- Registration exceeded 300 people from more than 60 organizations

- Hosted two classes and two offices hour to-date

- Third class on 9/23

- **Planning for second boot camp in January 2021**

Online Community of Practice
www.sequoiaproject.org/community

Information Blocking Online Forum

Welcome to the Information Blocking Bootcamp

This content is only available to information blocking bootcamp participants. Check back regularly for updates.

Forum Topics

Welcome to Bootcamp: Important Messages from the Admin

Vendor only provides EHI in PDF on contract termination

USCDI criteria Birth Sex

How are others tracking? Any new innovations to address info blocking?

CMS Documentation on Requiring Providers to use FHIR by August 2022 or later

VIEW FORUM →

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Forthcoming Timing Updates

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Pending EO 12866 Regulatory Review

RIN: 0955-AA02   **View EO 12866 Meetings**   **Received Date:** 09/17/2020

Title: Information Blocking and the ONC Health IT Certification Program: Extension of Compliance Dates and Timeframes in Response to the COVID-19 Public Health Emergency

Agency/Subagency: HHS / ONC   **Stage:** Interim Final Rule

Legal Deadline: None   **Economically Significant:** No

International Impacts: No   **Affordable Care Act [Pub. L. 111-148 & 111-152]:** No

Pandemic Response: No   **Dodd-Frank Wall Street Reform and Consumer Protection Act, [Pub. L. 111-203]:** No

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Key Question Areas from the Boot Camp

- When can a payer be an Actor?
- Can an organization be in 2+ Actor categories?
- Provider attestation/"disincentives
- Who is an HIE/HIN?
- Bi-directional exchange and "write" access
- Permissible security and vetting for apps
- Status of the USCDI relative to EHI and CCDS

- Relationship of HIPAA to EHI and Information Blocking
- "Immediate" data access in the portal or API (e.g., results)
- Ability to consider "emotional harm"
- Role of "intent" and "knowledge"
- Impact for HIEs/HINs
- Need for specific technology like portals and APIs
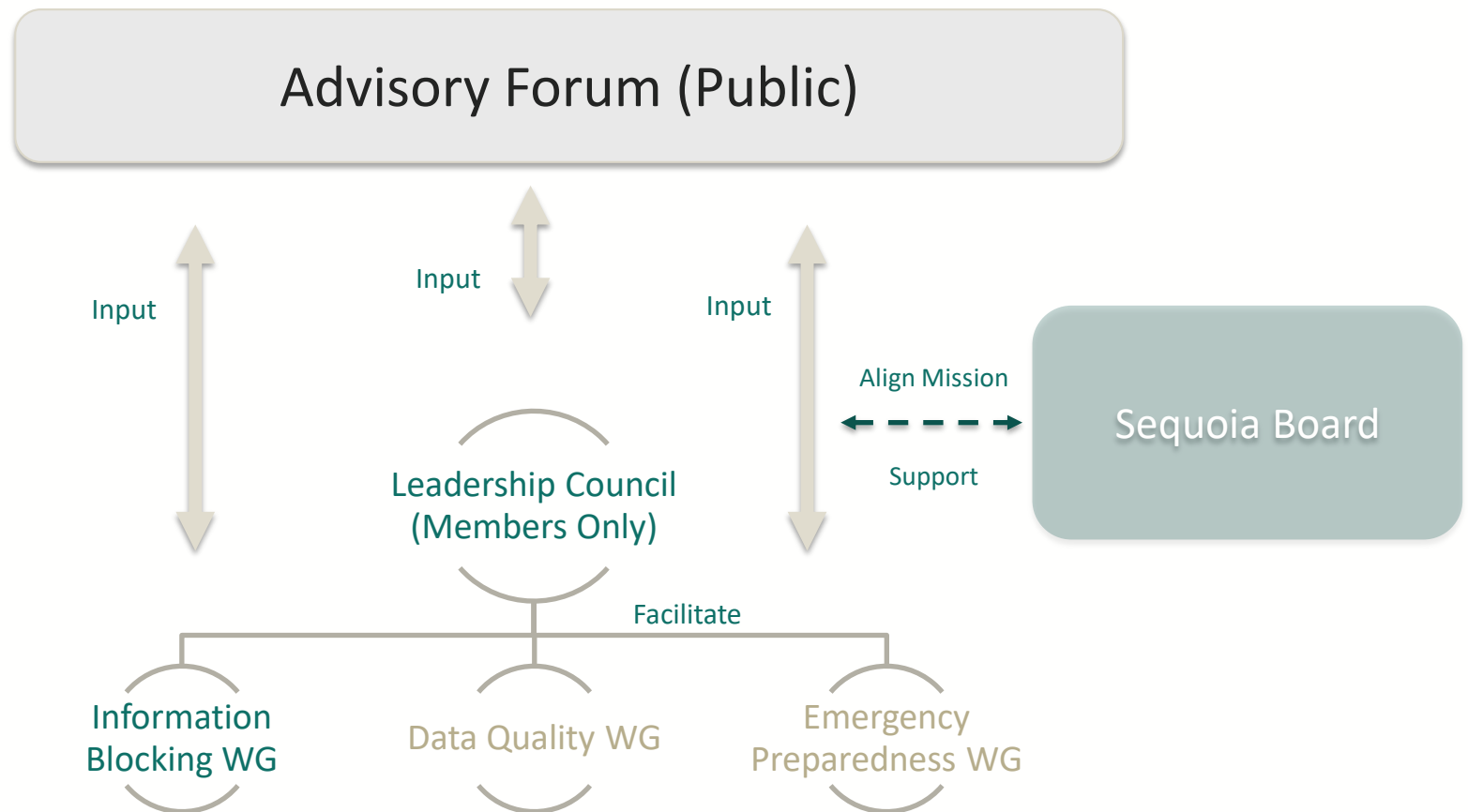- Measurement of costs uses as a basis for fees

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Open Discussion

- Priority questions re: Information Blocking compliance.
- Priorities for ONC FAQs
- Priority needs for industry resources

Interoperability Matters Proposed Work Group

Interoperability Matters Structure

Data Quality Work Group

Purpose

- Develop specific and pragmatic implementation guides on clinical content for healthcare stakeholders to facilitate health information exchange.

- Cover identified priority use cases, that are readily adoptable by health information exchange vendors, implementers, networks, governance frameworks, and testing programs.

- Target improvements necessary to enable semantic interoperability of health information to improve the usability of data received by end users within their workflows.

- Build on existing work (e.g. C-CDA Templates, ONC, USCDI V1, joint Carequality-CommonWell Document Content Workgroup) and coordinate with related SDOs and industry initiatives

Scope and Key Deliverables

- Develop three implementation guides focusing on data quality and addressing each of the following high-level use cases:
  - Provider-to-provider health information exchange
  - Provider-to-Public Health Agency information exchange
  - Healthcare entity-to-consumer information exchange
- Initial focus will be identifying priority elements to address in each implementation guide.
- Limit each implementation guide to a set of recommendations that is reasonable for a technology provider to address in one major software version cycle (e.g. 18 months).

Status and Next Steps

- Leadership Council approved draft work group charter

- Presenting proposal to the Sequoia Board of Directors on 9/25

- Prepare for launch and facilitate call for participation

- Target launch date: October/November 2020

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https://sequoiaproject.org/interoperability-matters/