

Health Information Technology Advisory Committee

HTI-1 Proposed Rule Task Force 2023 Virtual Meeting

Group 3: ONC Health IT Certification Program Updates – Insights Conditions, Standards Updates, and RFIs

Meeting Notes | May 11, 2023, 10:30 AM – 12 PM ET

Executive Summary

The focus of the Group 3 Health Data, Technology, and Interoperability: Certification Program Updates, Algorithm Transparency, and Information Sharing (HTI-1) Proposed Rule Task Force session on May 11 was to review and discuss the insights condition and maintenance of certification proposal. The Task Force also walked through the United States Core for Data Interoperability (USCDI) version 3 (v3) Consolidated Clinical Document Architecture (C-CDA), Fast Healthcare Interoperability Resources (FHIR) US Core Revisions, and Application Programming Interface (API) updates. Additionally, Group 3 planned for the May 17th Health Information Technology Advisory Committee (HITAC) Meeting Task Force update.

Agenda

10:30 AM	Call to Order/Roll Call
10:35 AM	HTI-1 Proposed Rule Task Force Charge
10:40 AM	Insights Condition and Maintenance of Certification Proposal- EHRA Feedback and Discussion
11:30 AM	USCDI v3, CCDA, FHIR US Core Revisions, and Standardized API Updates Recommendation Language
11:40 AM	Planning for May 17 th HITAC Meeting Task Force Update
11:50 AM	Public Comment
12:00 PM	Adjourn

Call to Order

Mike Berry, Designated Federal Officer, Office of the National Coordinator for Health IT (ONC), called the meeting to order at 10:33 AM.

Roll Call

Members in Attendance

Steven Eichner, Texas Department of State Health Services, Co-Chair
Steven Lane, Health Gorilla, Co-Chair
Hung Luu, Group 3 Lead
Hans Buitendijk, Oracle Health
Clem McDonald, National Library of Medicine
Fillipe (Fil) Southerland, Yardi Systems, Inc.



Members Not in Attendance

Elaine Johanson, FDA
Meg Marshall, Department of Veteran Affairs (VA)
Naresh Sundar Rajan, CyncHealth

ONC Staff

Mike Berry, Designated Federal Officer, ONC
Dustin Charles, ONC
Sara McGhee, ONC
Al Taylor, ONC
Michael Wittie, ONC

Key Points of Discussion

HTI-1 Proposed Rule Task Force Charge

Steven Lane welcomed Group 3 attendees to the HTI-1 Proposed Rule Task Force (Task Force) meeting. Group 3 lead, Hung Luu, reviewed the agenda and charge outlined in the [May 11 meeting presentation materials](#).

Insights Condition and Maintenance of Certification Proposal- Electronic Health Record Association (EHRA) Feedback and Discussion

Hans Buitendijk, Task Force and EHRA member, and guest, Sasha TerMaat, Director at Epic and part of the EHRA co-presented on EHRA recommendations for the insights condition and maintenance of certification proposal.

Discussion:

- Hans suggested implementation of this aspect of the Final Rule begin 18 months after the publication. Electronic health records (EHRs) need to obtain data from their clients, and the contracts will need to be updated to allow for that.
 - Sasha agreed with Hans' sentiment. The current timeline is not sufficient to update contracts and gain access to EHR client data.
- Sasha said the reporting initiative should remain balanced with other initiatives happening across the industry. In the past, EHRA has struggled with interpreting the purpose of reporting the data. It would be helpful to have context on how and why EHRs need to report data.
- Hans also noted it would be beneficial if data could be reused because it would help streamline the reporting approach. EHRA would like clarity on the purpose of collecting this data since it will be a large undertaking.
 - Sasha said some developers have integrated products that do not differentiate actions between certified applications. If there is an ambulatory and in-patient EHR with the same endpoint, it is not clear how to differentiate the two data sets. EHRA advocates aligning FHIR and CCDA so insights can align with quality measures for the purpose of Center for Medicare and Medicaid Services (CMS) measurements.
 - Hans suggested ONC work with CMS to align on FHIR and CCDA encounter metrics.



- Hans highlighted individual access to electronic health information (EHI). EHRA is looking specifically at apps for EHI. Often, it is unclear what kinds of EHI apps are asking for.
- Hans noted for FHIR supported apps that, there are scope questions that come into play. To have a more consistent view, EHRA believes the certification scope should be for the resources the EHR is certifying against, and there should be consistency with what is being certified. If a specific resource is not critical to the EHR performance and operation, it should not impact certification status.
 - Hans also recommended collecting additional data at app re-registration. He recommended removing requirements to stratify by US Core IG version use.
 - For Bulk FHIR, Hans recommended the scope be certified FHIR resources.
- Sasha suggested ONC clarify if immunization administration must happen in the reporting period or if the transmission to the immunization information services (IIS) should occur in the reporting timeframe.
 - Hans and Sasha both noted more volume of data exchange is not always better. Metrics should also consider the efficiency and value of the exchange.
- Clem McDonald noted it is hard to sort through duplicate documents, and document IDs are not always unique. If content is the same, the document should have the same identifier; however, this can be hard to determine. How much change warrants a new ID?
 - Hans said identifiers help with duplicates, but it is only a portion of the data. If content is the same, the document should have the same identifier, but this can be difficult to determine. He noted this is currently being discussed within the EHRA.

USCDI v3, CCDAs, FHIR US Core Revisions, and Standardized API Updates Recommendation Language

Steven Lane facilitated the group discussion on recommendations for USCDI v3, CCDAs, FHIR, and standardized API updates.

Discussion:


- The Task Force was supportive of the FHIR US Core updates. FHIR 6.0.0 was published in early May.
 - The Task Force noted as new and expanded versions of USCDI are specified in rulemaking, ONC should consider how to support specialty EHRs in achieving and maintaining certification.
- Clem asked when the final rule is expected to be published.
 - Al Taylor, ONC, said the public comment period goes through June 20th. After that, there is an internal clearance process. There is no specific date for publication yet.
- Fil Southerland recommended ONC investigate the burden that an expanding USCDI introduces to specialty EHRs that do not track specific data elements.

Planning for May 17th HITAC Meeting Task Force Update

Steven Lane asked the Task Force for input on what to bring to the HITAC next week.

Discussion:

- Hans said it would be beneficial to raise the specialty EHR and USCDI burden to the HITAC.
 - Fil seconded that. There is an opportunity for HITAC to ask ONC more about it.
 - Clem said the Task Force will need to be careful about how it is brought up.
- Hung Luu noted the Task Force is supportive of USCDI v3. However, there are discrepancies on how it is implemented in practice.

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- Steven Lane agreed. The Task Force will raise concerns about the implementation of future USCDI versions by specialty EHRs and vendors that may not need to collect and manage all data elements.

PUBLIC COMMENT

Mike Berry opened the meeting for public comments.

QUESTIONS AND COMMENTS RECEIVED VERBALLY

No questions or comments were received verbally.

QUESTIONS AND COMMENTS RECEIVED VIA ZOOM WEBINAR CHAT

Mike Berry (ONC): Welcome to the HTI-1 Proposed Rule Task Force. We appreciate your interest. Please tag "Everyone" when using Zoom chat so that all can view your comment. Thank you!

AI Taylor: @Clem, here is a link to the Real World Testing Resource Guide:

https://www.healthit.gov/sites/default/files/page/2021-08/ONC-Real%20World%20Testing%20Resource%20Guide_Aug%202021.pdf#page=19

Akaki Lekiachvili: If the intent is to measure interoperability, each instance of data exchange, irrespective of whether it is a duplicate or not, is an instance of interoperability (assuming each duplicate exchange had a business need)? And addressing of duplication is not necessarily part of the interoperability?

Hans Buitendijk: @Akaki - Agreed on the first. Addressing duplication is part of the hand-off from interop to the system where interop can help address availability of (provenance) data to make that ingestion easier.

QUESTIONS AND COMMENTS RECEIVED VIA EMAIL

No comments were received via email.

Resources

[HTI-1 Proposed Rule Task Force 2023 Webpage](#)

[HTI-1 Proposed Rule Task Force 2023 – May 11, 2023 Meeting Webpage](#)

[HITAC Calendar Webpage](#)

Adjournment

The meeting adjourned at 11:59 AM.