



Draft Considerations for Review and Discussion for the NCVHS Standards Subcommittee June 9, 2022, Listening Session

NCVHS' Subcommittee on Standards is seeking industry reaction on potential considerations drafted based on input and information gathered at the Subcommittee Listening Session held August 25th 2021, and in response to its [request for information](#) to support its current project, "Standardization of Information for Burden Reduction and Post-Pandemic America" ([Convergence 2.0](#)).

HIPAA and the efforts of CMS and ONC have positioned the industry well to begin conceptualizing a strategic vision for health information technology standards to support broader administrative data flows than currently encompassed under HIPAA and other federal legislation. The Subcommittee's Convergence 2.0 work also assesses the readiness of the current standards development and federal rulemaking processes to support this emerging landscape.

The Committee is seeking reaction to the draft considerations from potential end-users, standards development organizations, trade and professional organizations and other members of the public. The purpose of this meeting is to provide a public forum to obtain this feedback. After input is received during this meeting, the Subcommittee anticipates developing recommendations for discussion by the full Committee. Background on the Subcommittee's process to develop these Draft Considerations is [available here](#).

CATEGORIES OF ISSUES FROM FINDINGS	CONSIDERATIONS FOR INDUSTRY REVIEW AND FURTHER DISCUSSION Informed by August 2021 Industry Listening Session and RFI
<p>ADVANCE HIPAA STANDARDS ADOPTION FOR ADMINISTRATIVE TRANSACTIONS</p>	<p>Action Item for Consideration 1: Update relevant HIPAA policies to allow the adoption and use of more than one standard per business function. Health Plans would be required to support all adopted standards for their industry sector. Providers could choose which other proposed/adopted standard or standards to conduct with their health plans.</p> <p>Action Item for Consideration 2: Enable HIPAA covered entities to support multiple versions of adopted standards for business functions. This provides an opportunity for innovators to be one version ahead of the current adopted version.</p> <p>Action Item for Consideration 3: Revise the standards exception process¹ for HIPAA covered entities who submit an application with the required justification and business case to automatically authorize them without waiting for review. Willing trading partners would automatically be authorized to use different standards for the same transaction and for the same business purpose(s). Reporting on the use of alternative standards would be required of the willing trading partners.</p>

¹ 45 Code of Federal Regulations (C.F.R.) § 162.940

<p>ADDRESS STANDARDS INTEGRATION & COLLABORATION</p>	<p>Action Item for Consideration 4: Identify options for improved integration of health information standards, including base standards plus standard development organization (SDO) implementation guides, <u>more broadly than at present</u>, and fostering relevant collaboration across HHS Agencies and Offices (e.g., CMS, ONC, CDC, NIH, IHS) including State, Local, Tribal & Territorial Governments.</p>
<p>MEASURE THE VALUE OF STANDARDS</p>	<p>Action Item for Consideration 5: Develop and publish a guidance framework with recommended definitions, metrics, templates, and pilot test procedures, including methods for reporting on standards readiness, standards costs, results of real-world testing and metrics essential for evaluation of standards, to enable better measurement, management, and understanding of standards maturity, standards implementation success, and the net value of standards.</p>

Meeting info is posted here:

<https://ncvhs.hhs.gov/meetings/standards-subcommittee-meeting-3/>