



Health Level Seven, Inc.[®]

The Standard for electronic data exchange in health care

An ANSI accredited standards developer

December 6, 2004

Maria Friedman
Centers for Medicare & Medicaid Services
Mail Stop S2-26-17
7500 Security Boulevard
Baltimore, MD 21244-1850

Dear Ms Friedman:

Health Level Seven, Inc. wishes to submit the following position statement for the December 8-10 NCVHS Standards and Security Subcommittee hearing on E-signatures:

A common body of healthcare security standards and implementation guidelines, including those addressing electronic signatures and public key infrastructure, is essential to the efficacy and interoperability of electronic health records. Health Level Seven encourages and supports collaboration leading to the consistent, useable, reliable, and secure implementation of electronic health records. Several members of the HL7 Security and Accountability Special Interest Group are in turn members of other healthcare standards development organizations and consortia considering various aspects of healthcare security standards. They are committed to facilitating collaboration on security standards development and deployment in healthcare. While there may be instances where less than optimal solutions are adopted to further limited objectives, the industry must not lose sight of its ultimate goal of secure and interoperable electronic health records. This goal can be reached through the creation of a well thought out and robust collaborative roadmap for the evolution and implementation of appropriate security standards. In this context, it is important to note that HL7 and NCPDP have already started a project to ensure semantic interoperability between their standards. They have agreed to base this work on the HL7 Development Framework (HDF) paradigm, and the consideration of healthcare security standards is a natural addition to this effort.

I appreciate the opportunity to share this statement on behalf of HL7 and encourage the subcommittee to contact me or the Health Level Seven Headquarters office should you have comments or questions.

Sincerely,

Mark Shafarman
Chair, HL7 Board of Directors