

**National Committee on Vital and Health Statistics (NCVHS)
Subcommittee on Standards**

**Hearing on HIPAA and ACA Administrative Simplification
-- Operating Rules, Review Committee --**

**National Center for Health Statistics
3311 Toledo Road, Auditorium A&B
Hyattsville, Maryland 20782**

**Thursday, February 26, 2015
HL7 Responses**

Good afternoon. My name is Charles Jaffe and I am CEO for Health Level Seven International. Health Level Seven International (HL7) is the global authority for healthcare information interoperability and standards with affiliates established in more than 30 countries. HL7 is a non-profit, ANSI-accredited standards development organization dedicated to providing a comprehensive framework and related standards for the exchange, integration, sharing, and retrieval of electronic health information that supports clinical practice and the management, delivery and evaluation of health services. HL7's more than 2,300 members represent approximately 500 corporate members, which include more than 90 percent of the information systems vendors serving healthcare. HL7 collaborates with other standards developers and provider, payer, philanthropic and government agencies at the highest levels to ensure the development of comprehensive, reliable standards and successful interoperability efforts. Its efforts are sponsored, in part, by the support of its benefactors.

On behalf of the HL7, I would like to thank the committee for the opportunity to provide comments on developing evaluation criteria for the Review Committee. We support the NCVHS's new role as the ACA Review Committee and the Subcommittee on Standards Review Committee charter, guiding principles, and work plan as described in December 2014.

HL7's perspective will be addressed in future Review Committee discussions and hearings. Recommendations for adoption of HL7 standards focus on exchange of clinical information, and may include electronic health records, attachments, clinical quality information, transition of care and others.

The new Review Committee will initially address if the current administrative standards continue to fulfill business needs, and whether changes are needed. Innovation in our industry will bring the anticipated adoption of clinical standards and the need for their review and evaluation.

I would like to thank you for the opportunity to respond to Subcommittee questions and provide our perspective on the Review Committee Evaluation Criteria and Process.

■ **What suggestions are there for evaluation criteria?**

We support the establishment of a set of principles/criteria that assist in the evaluation process. Although this is not a comprehensive list, we believe that review should include the following attributes:

- Support for the ONC 2015-2020 Strategic Roadmap for clinical data exchange and interoperability
- Promote the exchange of health care information between providers, payers, and consumer/patients
- Develop solutions that meet the needs of all stakeholders for the outcomes that have been proposed.
- Enable all interested parties the opportunity to participate and to provide input to the proposed solutions.
- Support Draft Standards that have been implemented and tested before those standards become normative.
- Provide an adequate environment for harmonization of multiple standards and solutions.

■ **Should the RC evaluation criteria be used to evaluate new/proposed standards and operating rules? Please explain.**

Yes, at minimum for consistency in the evaluation process will enable a more mature process and lead to effective and efficient outcomes for all stakeholders.

■ **Do you have evaluation criteria that can be used to evaluate standards and operating rules?**

- HL7 supports the standards “maturity criteria” that have been adopted by the HIT Standards Committee.

■ **What evaluation criteria have you seen that are effective? Please explain?**

HL7 standards and implementation guides are subject to of the ANSI process for review and approval before publication and a maturity process that requires experience from implementation.

■ **What process(s) should be used to evaluate standards and operating rules?**

- As processes are developed to evaluate the standards and operating rules, the inclusion of all stakeholders to ensure their perspective is considered critical.
- NCVHS public testimony via hearings and written comments
- HL7 balloting process, adjudication of negative ballots, and analysis of comments and suggestions.
- Authoritative review of all Designated Standards Maintenance Organization recommendations.

CONCLUSION

HL7 supports the ACA Review Committee and recognizes the need for the industry to develop timelier and more predictable maintenance cycles.

As the Review Committee begins to evolve, we believe that the evaluation criteria will continue to develop and evolve before moving into a second review cycle. In particular, we anticipate that the review of clinical standards will be included.