# National Committee on Vital and Health Statistics (NCVHS)

## Predictability Roadmap

## Subcommittee on Standards

### September 2017

**Background:** The Secretary has the authority to adopt new or updated administrative standards annually. The federal government's health information technology strategic plan and interoperability road map calls for the use of electronic health records by all providers, and the electronic exchange of patient information between all users of the data.

The Secretary last adopted a new version of both administrative and pharmacy standards for the exchange of administrative and financial information in 2009 (mandated for use in 2012). A new version of the administrative standard was developed several years ago – X12 version 6020, but was not brought forward to NCVHS for a recommendation to be adopted. Another new version of the X12 standard, 7030, has been under development for several years, though there have been delays in its development and review by industry. It was anticipated in 2016, but may not be brought to NCVHS until 2018. This is a ten year window; under current industry and regulatory processes, industry's ability to implementation could be four to six years away.

Pharmacy standards are updated on a regular schedule, but these new versions have not been proposed to NCVHS, or recommended to the Secretary since 2012. The pharmacy industry is using outdated telecommunications standards as a result. The latest version of the eprescribing standard was adopted in November 2012 with a November 2013 effective date.  NCPDP is working with the Center of Medicare and the HHS Division of Health Information Technology to name a new version of the ePrescribing standards this year (2017). In addition, an NCPDP task group is investigating and gathering industry feedback on establishing a predictable cycle for bringing forward new versions of the ePrescribing standards for adoption.

The challenge facing the health care industry, vis a vis administrative/financial (non-pharmacy) transaction standards and operating rules is this: the schedule on which most standards and operating rules are updated and adopted is not predictable.  It is not knowable, routine, or reliable. This makes it impossible for covered entities to plan for their business and their finances, and to have confidence in the processes or procedures.

**The purpose** of conducting a comprehensive information gathering initiative with the (administrative) standards development organizations, operating rule authoring entity and HHS is to identify the barriers to the update and adoption processes. These (barriers) result in the inability of covered entities to reliably know when they will, can or should upgrade their systems and operations to take advantage of efficiencies and cost saving opportunities – particularly those that would be available through standards related technology.  The same group that creates and experiences the barriers, can help identify mitigation options and strategies, their feasibility, pros and cons.

**The proposed activity**: NCVHS will convene a conference call and one or more workshops with the Standards Development Organizations (SDOs) and Operating Rule Authoring Entity[1] to a) validate the current timeline and procedures for updating the adopted standards and operating rules; b) identify barriers to updating the standards and operating rules on a predictable timeline; c) identify opportunities for mitigating the barriers to updating the standards; d) identify opportunities for recommendations to the Secretary of Health and Human Services.

**Outcomes**: The participants will collaborate to identify opportunities for improvement in their own and each other's processes. The expected outcomes of the workshop will be:

a) Implementable ideas for process improvements for each standards development organization and operating rule authoring entity (ORAE) short term (within 12 months[2]) and longer term;

b) Analysis of alternative opportunities to adopt standards and operating rules for Health and Human Services (HHS) under current administration and future;

c) A summary report of the conference call and workshop to be publicly available and used to solicit feedback from other stakeholders;

d) Actionable recommendations for the Secretary of HHS.

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[1] The current operating rule authoring entity is not ANSI Accredited and has a different method of updating its operating rules than the SDOs. NACHA is also not ANSI Accredited, but governed by another authority, to be identified. All should be included in the project to identify and/or create synergies in the overall process.

[2] While this timeline may not be the end goal, we want to use SMART goals that are measurable and actionable in a reasonable time frame to be meaningful to industry and HHS.