Electronic Healthcare Network Accreditation Commission

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October 23, 2018

To: National Committee on Vital and Health Statistics
Subject: EHNAC Comment of the Draft Predictability Roadmap

The Electronic Healthcare Network Accreditation Commission (EHNAC) is a voluntary, self-governing standards development organization (SDO) established to develop standard criteria and accredit organizations that electronically exchange healthcare data. These entities include accountable care organizations, data registries, electronic health networks, EPCS vendors, e-prescribing solution providers, financial services firms, health information exchanges, health information service providers, management service organizations, medical billers, outsourced service providers, payers, practice management system vendors and third-party administrators. The Commission is an authorized HITRUST CSF Assessor, making it the only organization with the ability to provide both EHNAC accreditation and HITRUST CSF certification.

EHNAC was founded in 1993 and is a tax-exempt 501(c)(6) nonprofit organization. Guided by peer evaluation, the EHNAC accreditation process promotes quality service, innovation, cooperation and open competition in healthcare.
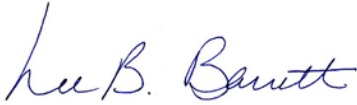
EHNAC commends the Committee on undertaking the task to streamline the Administrative Simplification Standards adoption process. While the process has moved the industry forward, progress has been slow and often lagged industry and technology changes. It is an interesting contrast with the Security standards, which provided a broad framework for entities to follow and did not limit technology. Our specific comments are as follows:

1. The Roadmap properly focuses on EDI and talks about the expansion of transactions, but nowhere mentions the increase of breaches and the vulnerability of electronic data. Some mention should be made of this, as well as some alignment with security requirements. Perhaps each change of EDI standards needs a risk assessment. This could be a more proactive approach to assure risk mitigation.

2. On page 24, the Roadmap mentions expanding the definition of covered entities or creating an equivalent process to being others under the umbrella for transactions and data protection standards. EHNAC has a myriad of programs which deal with a wide range of entities (networks, clearinghouses, HIEs, etc.) to assure that they are meeting both security and transaction standard requirements. We would be happy to suggest accreditation program criteria to use for the non-covered entities.

3. Item C under Calls to Action on p 29 recommends developing criteria for certification. EHNAC already developed a program for accrediting practice management systems (the Practice Management System Accreditation Program). Our criteria is available for consideration and referencing and can be accessed at the EHNAC web site (https://www.ehnac.org/practice-management-system-accreditation-program/)

4. Regarding the replacement for the DSMO organization for oversight and governance of the standard process, EHNAC would be pleased to collaborate with this entity and share our expertise in working with the myriad of entities in the health care system.

Thank you for consideration of our comments.

Respectfully,

Lee Barrett, Executive Director

Cc: EHNAC Commission
    EHNAC Staff