

Deborah Gash
SVP Chief Digital Officer
Saint Luke's Health System
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1. How do these recommendations improve the predictability of the adoption of administrative standards and operating rules?
 - a. How do we measure success?

Enhancements to the standards and operating rules are not keeping up with business and technology. Plus, changes aren't predictable enough to allow for effective planning, resource allocation and implementation. The last standard was over 7 years ago and the last operating rule was 4 years ago. Having a process to revise and refresh the standards and operating rules that is more dynamic will enable adoption of new technology that could be more cost effective and less burdensome.

A method to measure success would be adoption of the CAQH Index (<https://www.caqh.org/explorations/caqh-index>). This would enable measurement of administrative savings. It is used in the industry for tracking health plan and provider adoption of electronic administrative transactions (837s, 835, 27X, EFT, etc...) The index also estimates the industry cost savings opportunity, an amount that declines as adoption and efficiency grows. By tracking progress, industry and government can more easily identify barriers that may be preventing stakeholders from realizing the full benefit of electronic administrative transactions. These insights can prompt new initiatives, new standards and reduce barriers.

2. What additional recommendations are critical to achieve predictability in the implementation, update, and adoption of standards and operating rules?

There are too many administrative layers to new EDI and Clinical Data initiatives for the healthcare industry in regards to current standards development organizations (SDO) and designated standards maintenance organizations (DSMO). The DSMO consists of representatives from various SDOs (x12, HL7, NUBC, NUCC, NCPDP, ADA). The recommendations to streamline the review and governance process and involve broader stakeholders would support the goal of achieving predictability.

I encourage consideration of engaging organizations in the stakeholder community to create Provider Test Beds for evaluating proposed new standards. The Da Vinci Project (www.hl7.org) is a good example of collaboration between various stakeholders to evaluate the HL7 FHIR protocol for exchanging information that could be leveraged to achieve the predictability goals.

The Da Vinci Project was created to address interoperability challenges that have limited many stakeholders in the healthcare community from achieving better care at lower cost. The dual challenges of data standardization and easy information access are compromising the ability of both payers and providers to create efficient care delivery solutions and effective care management models. The goal of the Da Vinci project is to help payers and providers to positively impact

clinical, quality, cost and care management outcomes. The use cases being tested for this project are both clinical and administrative.

If the governance organizations that are defining these new standards worked with organizations like HL7.org on efforts like this to develop test beds it would provide a mechanism to evaluate new capabilities, determine value, and provide insights to the governance organizations on potential new standards.

Incorporating professional associations such as HIMSS or CHIME who represent such a large group of key stakeholders, may also be of value to the governance process. Groups like this could help to identify early adopters or assist in creation of test beds.

And specifically,

1. What is the expected outcome we should expect of each recommendation?
 - a. What improvements to the current state do you believe will arise from each recommendation or group of similar recommendations?

Overall the improvements should be reduced healthcare administrative costs for all stakeholders because the industry would create a mechanism to update the standards more timely that leverage new technology and encourage adoption of digital tools.

Given the emphasis on Education and information transparency which I believe is critical for success, I would expect a more informed and engaged stakeholder group. I appreciate the recommendation to appropriately staff the Department with resources and would advocate that the skills include technical expertise.

If there is a mechanism to test new standards we should be able to implement change that is practical and drives value for all parties.

2. Are there potential unintended consequences from any of the recommendations? What are those and how can they be mitigated with modifications to the recommendations?

We should be careful not to remove too many administrative layers at the cost of relaxing existing standards and operating rules. A balance is needed that is practical and provides the necessary oversight to ensure compliance.