ONC's Proposed Strategy on Governance for the Nationwide Health Information Network Following Public Comments on RFI

HIT Policy Committee Meeting
September 6, 2012

What are ONC's Goals?

- Strengthen interoperability at the implementation level;
- Facilitate the emergence of a market for health information exchange services that syncs with payment reforms;
- Foster trust among providers about the exchange services they use;
- Foster trust among consumers about the exchange of their personal health information;
- Reduce risk, cost and complexity of exchange; and
- Promote effective relationships between intermediaries.

- Data have never moved well across organizational, vendor, and geographic boundaries; resolving this will be foundational to improve patient care as well as payment and delivery reform
    - Trust relationships between entities are difficult and costly, and take time to build and nurture;
    - Some business practices and revenue models have always tended to reinforce silos;
    - Existing models that support exchange are not sufficiently recognized and replicated; and
    - Implementation guides are not sufficiently specified.

- A voluntary governance framework, established through a new regulation, focused on entities that facilitate electronic health information exchange;

- The establishment of a set of conditions for trusted exchange (CTEs) – "rules of the road"– in the areas of safeguards (privacy and security), interoperability, and business practices;

- A validation process for entities to demonstrate conformance to the CTEs;

- Processes to update and retire CTEs;

- Establishment of a process to classify the readiness of technical standards and implementation specifications to support interoperability related CTEs; and .

- Approaches for monitoring and transparent oversight.

- Health information exchange is in its infancy and regulations could stifle an emerging market.

- ONC's goal should be to guide the market, while ensuring basic protections through existing regulatory frameworks – some already being implemented, others are pending implementation.

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- A number of organizations and entities are already testing best practices for the exchange of information, and the concern is that additional regulations could slow expansion of these efforts.

- In an effort to achieve our goals – and to strengthen trust among various entities – we need a better understanding of how they are exchanging information, learn from their successes and failures, and encourage others to build on the good examples.

- This is new territory, and there is a lot going on that is working very well.

- We heard there are specific interoperability challenges that should be tackled through non-regulatory approaches or built upon existing approaches.

ONC 's Proposed Approach

- <u>Lead Through Action:</u> Use available levers to directly accomplish specific goals

- <u>Lead through Guidance :</u> Disseminate a framework of principles and, where available, good practices, models, and tools for specific exchange challenges

- <u>Engage, Listen, and Learn:</u> Proactively encourage and engage with communities and stakeholders offering solutions for exchange.

- <u>Monitor:</u> Monitor marketplace for abuses, exchange successes, gaps and failures; and consumer and provider attitudes

Discussion