



October 1, 2018

Don Rucker, MD  
National Coordinator for Health Information Technology  
Office of the National Coordinator  
US Department of Health & Human Services  
200 Independence Ave, S.W.  
Washington, DC 20201

Submitted electronically at: <http://www.healthit.gov/isa>

**RE: Request for Public Comment: Interoperability Standards Advisory (ISA)**

Dear Dr. Rucker:

Health IT Now (HITN) is pleased to submit these comments in response to the Office of the National Coordinator's (ONC) Request for Public Comments regarding the Interoperability Standards Advisory (ISA).

Health IT Now (HITN) is a diverse coalition of healthcare providers, patient advocates, consumers, employers, technology companies, and payers who support the adoption and use of health IT to improve health outcomes and lower costs. Our coalition came together with a focus on electronic health records (EHRs) but our members' interests and applications of information technologies have expanded beyond traditionally-regulated medical products to include consumer devices, Software As A Service (SAAS), and Infrastructure As A Service (IAAS) products that may not have been originally conceived for use in health care. We believe our members to be a realistic representation of the technology-enabled healthcare waterfront and the myriad ways consumer and traditional medical products have been combined to reflect the new normal in the health care marketplace.

We have long advocated that interoperability should be the primary focus of ONC. We support the continuation of the ISA as a reference point for the diversity of existing as well as new players in the technology-enabled health marketplace and believe this initiative fits firmly within role envisioned by Congress when ONC was given its statutory authority.

There is significant utility in maintaining a publicly accessible list of standards and implementation specifications - especially as the healthcare market continues to broaden to reflect health and lifestyle consumer products and services. While it is maintained by a government source, the ISA does well to reflect the true level of readiness in the health IT marketplace. As we move toward a health care marketplace of widely utilized artificial intelligence and other advanced data analytics capabilities, enabled by zero-latency wireless infrastructure, the ISA could become a very important guide for policymakers and developers alike.

We strongly believe that the ISA can and should be more integrated into federal health IT programs, including in new rulemaking. The ISA was populated through an open, consensus process that has created a baseline level of buy-in from industry and other implementers. To this end, we believe this could be a more flexible way for standards assignment in the Promoting Interoperability (PI) program than the scheme devised by the HIT Standards Committee during the early stages of Meaningful Use. The previous model of standards assignment was very process driven instead of outcomes focused and we believe that was a primary reason that ONC received such significant pushback from industry and providers with every subsequent stage of Meaningful Use.

This approach aligns with the principles put forth by the Centers for Medicare and Medicaid Services in the Calendar Year 2019 Medicare payment rules. We believe that your role as ONC should be to guide the market towards better outcomes instead of taking a prescriptive approach – and supporting consensus, private-sector led processes like the ISA is one way to accomplish this.

HITN is encouraged by the renewed focus on interoperability and stands ready to actively participate in these ongoing efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Joel White", written in a cursive style.

Joel C. White  
Executive Director