



**BlueCross BlueShield
Association**

An Association of Independent
Blue Cross and Blue Shield Plans

1310 G Street, N.W.
Washington, D.C. 20005
202.626.4800
www.BCBS.com

October 1, 2018

Don Rucker, M.D.
National Coordinator for Health Information Technology
Office of the National Coordinator
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Submitted via the ONCHIT Web Portal, <https://www.healthit.gov/isa/>

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

Dear Dr. Rucker:

The Blue Cross Blue Shield Association (“BCBSA”) appreciates the opportunity to provide comments in response to the Office of the National Coordinator’s (ONC) Request for Public Comments regarding the Interoperability Standards Advisory (ISA), as announced in the Health IT Buzz (<https://www.healthit.gov/buzz-blog/interoperability/interoperability-standards-advisory-annual-request-for-comments/>).

BCBSA is a national federation of 36 independent, community-based and locally operated Blue Cross and Blue Shield Plans that collectively provide healthcare coverage for one in three Americans. For more than 80 years, Blue Cross and Blue Shield companies have offered quality healthcare coverage in all markets across America – serving those who purchase coverage on their own as well as those who obtain coverage through an employer, Medicare and Medicaid.

BCBSA has long supported the development of health information technology interoperability standards and certification requirements, which are critical to achieving an interconnected health care system that enables consumer-centric care with quality outcomes.

BCBSA commends ONC on its efforts to educate the healthcare industry on interoperability standards. The ISA serves as an important and comprehensive reference document to help push data interoperability forward. Additionally, we applaud ONC’s decision to include administrative transactions and consumer access/exchange standards to the 2017 ISA. BCBSA encourages ONC to enhance these topics in future ISAs.

Appended below are BCBSA’s comments to the 2018 ISA. We offer these comments with the aim to improve the ISA as a single trusted reference on interoperability standards necessary for industry engagement and building a fully integrated and interoperable healthcare information exchange system.

Dr. Don Rucker
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We appreciate your consideration of our comments. If you have any questions or need additional information, please contact Michael DeCarlo at michael.decarlo@bcbsa.com.

Sincerely,



Justine Handelman
Senior Vice President
Office of Policy and Representation

ONC RFI QUESTION	COMMENTS AND RECOMMENDATIONS
Stakeholders are encouraged to review content within the sections and specific Interoperability Needs to provide feedback, or submit requests for new Interoperability needs , as necessary.	<ul style="list-style-type: none"> • We recommend the following be included in the II-T: Summary Care record section: <ul style="list-style-type: none"> ◦ HL7 Version 3 Domain Analysis Model: Care Plan, Release 1 ◦ Cross-Paradigm Story Board Artifact: Payer Perspective, Value-Based Care, Release 1 (US Realm) ◦ HL7 CDA® Release 2 Implementation Guide: Additional CDA R2 Templates – Clinical Documents for Payers Set 1 (aka CDP1) • HL7 FHIR standards are not currently included in the II-L: Laboratory section. Sections of the HL7 FHIR standard should be included for the applicable interoperability needs. • Appendix I: Sources of Security Standards and Security Patterns may benefit from including FIDO as an authoritative source among the others listed.
18-1. In what ways has the Interoperability Standards Advisory (ISA) been useful for you/your organization as a resource? ONC seeks to better understand how the ISA is being used, by whom, and the type of support it may be providing for implementers and policy-makers.	<ul style="list-style-type: none"> • The ISA is a helpful tool and reference guide for standards implementation and development discussions. The document can educate and introduce an audience to the breadth of standards and their applications. • The ISA is a good baseline for future planning purposes. ONC should work with CMS and other federal health agencies to ensure the ISA is a starting reference point for all federal business operations. The ISA should be the baseline for federal and private-sector entities when beginning operations discussions about which standards to use for specific business needs.
18-2. Over the course of 2018, some new functionality has been added to the ISA, with more enhancements expected through 2018 and 2019. Are there additional features or functionality that would enhance the user experience?	<ul style="list-style-type: none"> • Improve the definition of <i>adoption level</i>. The adoption level definition should be tied to more specific criteria and should be consistent with National Institute of Standards and Technology (NIST) definitions for standards adoption, as applicable. • Specifically, the adoption levels for the federally required standards is in question for II-D: Clinical quality measurement and reporting. This clarity issue may apply to other standards, and an improved definition that addresses technical availability versus actual use/implementation would provide greater clarity and accuracy. • The ISA needs more granulation in the area of implementation advice. The guidance on piloting and production implementation is very limited. We recommend a new category, tied to adoption guidance, to reference implementation issues, including examples of how standards are used, who/what the standard is intended for, and who will be partners to the exchange of information.
18-3. Is the existing ISA format used for listing standards and implementation specifications applicable for listing Models and Profiles? Are there additional or different attributes that should be collected for them? Are there additional models and/or profiles that should be listed? Are models and profiles useful for inclusion in the ISA?	<ul style="list-style-type: none"> • The ISA format is effective for representing Models and Profiles. BCBSA recommends: <ul style="list-style-type: none"> ◦ The ISA should include Domain Analysis Models (DAM) and Cross-Paradigm Story Boards in this section where applicable. ◦ ONC should clarify the definition of Profile as distinct from HL7 FHIR profiles.
18-4. Are there additional informative or educational resources that can be provided to help stakeholders better understand the ISA, health IT standards, interoperability, etc.?	<ul style="list-style-type: none"> • Generally, we recommend that ONC coordinate with non-government stakeholders to formulate and implement a coordinated education strategy and collaborative product development that captures the disparate issues in implementing and using the standards for product

	<p>development as well as the installation and operation of the resulting products in production settings.</p> <ul style="list-style-type: none">• Specifically, a short on-demand user video accessed on the ISA homepage to introduce the ISA and walk-through the functions/uses may be helpful.• ONC has an opportunity to explore how the ISA might provide additional guidance on data usability, data quality, and how health IT vendors can consistently implement and apply standards to best promote interoperability.
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