Electronic Healthcare Network Accreditation Commission

www.EHNAC.org

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March 25, 2015

Karen DeSalvo, MD, MPH, MSc
National Coordinator for Health Information Technology
Acting Assistant Secretary
Department of Health and Human Services
200 Independence Ave., S.W. Suite 729-D
Washington, D.C. 20201

Dear Dr. DeSalvo:

The Electronic Healthcare Network Accreditation Commission (EHNAC) is pleased to submit comments on ONC's Interoperability Roadmap. We will focus our comments on our core expertise – the accreditation process for organizations and health IT products in the areas of privacy, security and confidentiality. EHNAC is a voluntary, self-governing federally recognized standards development organization established to develop standard criteria and accredit organizations that electronically exchange healthcare data. EHNAC accredits based upon standards of technical performance, business practices, and independent peer evaluation. EHNAC accreditation is carried out using independent peer evaluation of an entity's ability to perform at levels based on industry-established criteria.

Entities that can be accredited include accountable care organizations, electronic healthcare networks, EPCS vendors, e-prescribing solution providers, financial services firms, health information exchanges, health information service providers (HISPs), management service organizations, medical billers, outsourced service providers, payers, practice management system vendors and third-party administrators. EHNAC also provides the privacy and security review for organizations undergoing DirectTrust review for Direct HISP accreditation. The accreditation process is designed to allow any organization that is involved in the transfer of protected health information (PHI) to be assured that other accredited parties in the system are also handling their PHI securely.

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.

We are pleased to see that ONC recognizes that "Certification and Testing to Support Adoption and Optimization of Health IT Products and Services" is one of the five Interoperability Roadmap Building Blocks. EHNAC has long recognized the importance of accrediting an organization's adherence to not only standards but also to best practices in assuring the privacy and security of health information, in addition to meeting other HIPAA transaction requirements. Our recently announced Practice Management System Accreditation Program developed in partnership with WEDI goes a step further in assuring that PMS system vendors not only meet standards requirements but also offer appropriate levels of support for users.

ONC has stated on page 74 of the roadmap that one of the Learning Health Systems requirements is "Stakeholder assurance that health IT is interoperable: Stakeholders that purchase and use health IT must have a reasonable assurance that what they are purchasing can interoperate with other systems." While we agree that interoperability is one of the

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requirements, we would propose that the roadmap go further than just the certification/accreditation and testing of the interoperability standards. The range of functions, ease of use, vendor support and product platforms are all key issues for users of IT products. In addition to "base" certification of standards, we would also recommend that ONC confer and include vendor and user groups to help define best practices for IT products to meet, especially in the realm of interoperability.

We are also pleased to see that the list of critical actions for the certification/accreditation and testing requirements includes a mention of other industry certification/accreditation programs such as EHNAC to complement the ONC program. However, we have received feedback from entities about the multitude of certification and accreditation programs that already exist, and the need to streamline them. It will be important for ONC to recognize and work closely with other certification/accreditation programs to reduce any duplication of effort on the part of stakeholders and to align, as closely as possible, requirements among programs. We should be evaluating ways for entities to undergo a minimum of certification/accreditation programs to accomplish these goals.

EHNAC also recommends that we review and evaluate required versus optional certification/accreditation, and allow entities to choose the certifications/accreditations they wish to achieve. It will be the decision of the users of products to determine what certifications/accreditations they feel are necessary for a product in determining compliance with privacy, security and confidentiality to minimize exposure and risk of a breach or incident. A "one size fits all" approach leads to complex and "over-architected" products which may contain features not necessary to a wide range of users.

We also recommend that ONC work closely with certification/accreditation and testing organizations during the standards adoption process. It will be helpful to have certification/accreditation and testing tools available as early as possible in the product development stage so that vendors can assure their products meet the criteria as early as possible.

Thank you for the opportunity to comment.

Sincerely,

Lee Barrett
Executive Director
The Electronic Healthcare Network Accreditation Commission

Cc: EHNAC Commission