ONC INTEROPERABILITY ROADMAP
Recommendations

The Healthcare Administrative Technology Association (HATA) is the national association representing practice management system (PMS) vendors. HATA on behalf of its members encourages the Office of National Coordinator (ONC) to consider the following comments as the ONC Interoperability Roadmap evolves. HATA is strongly supportive of interoperable administrative and clinical information exchange to solve business needs. HATA will actively promote its Certification in Healthcare Administrative Technology (CHAT) program which recognizes PMS vendors providing a standard level of Privacy and Security, Software Functionality and Features that focus on both the electronic health record (EHR) and revenue cycle management (RCM) workflow.

HATA appreciates the opportunity to provide these recommendations intended to spur innovation, stay ahead of information exchange needs, and promote cost-effective interoperability:

- Information exchange that meets identified business and clinical needs of all stakeholders.
- Convergence of the administrative and clinical data to meet verified business use cases, interoperability principles and the exploration of emerging administrative and clinical use cases.
- Spur innovation and stay ahead of information exchange needs among stakeholders by the selection of a thought leader multi-stakeholder organization or collaborative of associations to monitor emerging trends and develop recommendations.

Information exchange that meets identified business and clinical needs of all stakeholders

To be both effective and widely-used, information transmitted by the payer and other stakeholders via a standard transaction must meet both the business and clinical needs of the provider. Data exchanged through the various standard transactions, must be meaningful to the end users. This data is currently exchanged, between varying administrative and clinical systems, both internally and externally across organizational boundaries that may not be used in the same context.

Recommendations:
- Create a standard data dictionary and standardized mapping across applicable standards and operating rules (X12, Health Level 7, National Council for Prescription Drug Programs (NCPDP, etc.). This will accelerate data harmonization and standardization.
- Raise awareness of 45 CFR §162.940 on exceptions from standards to permit testing of proposed modifications to encourage stakeholders to bring new capabilities to market faster and test use of a new transaction standard before it is considered for adoption.
- We are concerned with the selection criteria of a Recognized Coordination Entity under Trusted Exchange Framework Common Agreement (TEFCA). We would encourage the selection criteria to include impartiality to any participating health information network with no financial interest or ownership stake.
- ONC should collaborate with CMS to create a strong business case to ensure participation from multiple stakeholders through evolving payment incentive models, including Merit Based Incentive Payments System (MIPS) and alternative payment models (APMs) and other policy levers.

Interoperability principles for meaningful information exchange

Payers and their trading partners must be compliant with all required standards (standard transactions, operating rules, and implementation guides), in order for the industry to reduce administrative burden and achieve optimum efficiency. These standards include HL7, NCPDP, X12 and other recognized standard transactions. The performance of work

arounds to accommodate compliance with standards by numerous stakeholders is an unnecessary administrative burden on vendors and providers.

Recommendations:
- The ONC is encouraged to expand the application programming interface (API) transparency requirements for electronic health records (EHRs) patient data to practice management systems (PMS) administrative use cases. Explore administrative and clinical use cases for APIs that require both administrative and clinical data from both the EHR and PMS to solve business needs, such as prior authorization, quality measurement reporting etc.
- Stakeholders must ensure data is shared as outlined in the 21st Century Cures Act (Public Law 114-255) and specified in forthcoming regulation.

Convergence Administrative and Clinical Data to Meet Use Cases

Recommendation:
- Exchange of clinical information/attachments in support of administrative use case, such as claims and prior authorization across stakeholders should be facilitated. This exchange of administrative and clinical data will become more critical as value based care and other emerging innovations and payment models become more prevalent.
- Partner with the private sector to reach a common approach for patient matching across the industry.

Spur innovation and stay ahead of information exchange needs among stakeholders

Recommendation:
- We urge the selection of a multi-stakeholder organization or collaborative of associations which would include HATA and other appropriate associations to guide HHS as it monitors emerging trends across the industry that requires the exchange of administrative and clinical data and develops a comprehensive annual report.

CONCLUSION

Historically, the voice of the PMS vendor is underrepresented during interoperability industry conversations. HATA members provide critical feedback from the end user experience, and therefore HATA should be included in all collaborative efforts. HATA supports promoting interoperability programs and is uniquely poised to guide ONC as we have members that have standalone PMS and hybrid PMS EMS that can bridged both administrative and clinical use cases. HATA and its members look forward to working with ONC on its interoperability roadmap along with further opportunities to share its recommendation. Along with its members, HATA promotes and facilitates a streamlined, automated, and interoperable workflow across stakeholders that exchanges meaningful administrative and clinical information to meet providers' needs while allowing the provider to maintain existing workflows for maximum efficiency.

About HATA

The Healthcare Administrative Technology Association (HATA) is a non-profit trade association that provides a forum for the PMS industry and other affiliated stakeholders. The association serves as the representative voice to advocate and influence key stakeholders and government representatives on PMS Vendor issues. Its members: ALC Consulting, AllMeds, Alpha II, American Medical Association, AMBA, Availity, Cognizant, e-MDs, eProvider Solutions, EZClaim, GeBBS Healthcare, Greenway Health, HealthPac, InstaMed, Medinformatix, Medical Group Management Association, NextGen Healthcare, Office Ally, Optum, PAHCOM, PaySpan, PracticeAdmin, PracticeInsight, WorkCompEDI and Zelis. Payments represent more than 600,000 providers. To learn more about the Healthcare Administrative Technology Association, visit the website at www.hata-assn.org or contact Tim McMullen, JD, CAE, Executive Director, 844-440-HATA (4282) or tim@hata-assn.org