



Testimony to the IOM/NRC Committee on the Review of the Adoption and Implementation of Health IT Standards by the DHHS Office of the National Coordinator for Health Information Technology
September 17, 2007

Q: How effectively are the standards activities ONC processes working – specifically, are proceeding at an appropriate pace – from the perspective of the Utah Health Information Network.

A: The standards activities of the ONC are a worthy undertaking. ONC undoubtedly realizes that they are trying to eat, not an elephant, but an iceberg – something about the size of Texas. I was the primary author for the ASC X12 4010 HIPAA Professional Health Care Claim Implementation Guide - I am intimately familiar with the complex and demanding process of creating health data standards. Creating standards for clinical data and clinical data exchanges is several orders of magnitude more challenging than creating standards for administrative health information exchanges. It is going to take a long time and a lot of work.

UHIN is tracking the work of HITSP and CCHIT that focuses upon health information exchange. We have every intention of following their lead as the UHIN community begins to create implementable standards for clinical health information exchanges: we will not re-invent the wheel. However, to date, the ONC process of HITSP and CCHIT have had minimal impact upon UHIN or its members.

- a) **Standards Vs Implementation Guides:** The standards being proposed by HITSP are just that: Standards. They are a critical and important step in the right direction: it is absolutely essential work and must not stop. However, standards are not sufficient to create interoperability. To create interoperability, implementation guides must be developed from those standards. Those implementation guides must eliminate all proprietary formats and codes.
- b) **Utilizing Existing Resources more Efficiently:** A great deal of rigorous work has been done by organizations like Integrating the Healthcare Enterprise (IHE). Many of the people who work on HITSP and CCHIT are also involved in IHE so, in effect, the HITSP and CCHIT work dilutes the time they can spend on IHE. It might be a better investment of federal dollars to partner with IHE rather than work on a parallel track.
- c) **Bread and Butter Focus:** While the emphasis upon consumer empowerment, privacy and security, etc. is important, they are not 'bread and butter' issues for our members. Instead, UHIN members are focused upon creating implementable standards for exchanges such as peri-natal reports, Op reports, discharge summaries, lab results, history and physicals, etc. The community has an immediate need to create standards for the messages the form the backbone of the existing clinical exchanges.

So, to answer the question "How effectively are the standards activities ONC processes working – specifically, are proceeding at an appropriate pace?" I would say that these activities are, *per force*, proceeding at the appropriate pace: very slowly without much immediate useable impact *at this time*. I would suggest that HITSP and CCHIT place more emphasis upon existing health information exchanges rather than focusing upon future development such as personal health records.

However, it is critical that this work continue. To reduce or eliminate the babble of medical language and codes is a monumental task that will take decades. It will also take **significant financial or regulatory motivation to persuade the health care industry to broadly adopt these standards**. It is not enough to create the standards: there must be a compelling reason for vendors and health entities to invest in them.

The journey of a thousand miles begins with a single step. It is critical that HITSP and CCHIT continue to take those steps. UHIN is cautiously optimistic that the work of HITSP and CCHIT will eventually become a cornerstone of health information exchange in America.

Thank you for the opportunity to share this feedback.

Jan Root, Ph.D.,
Assistant Executive Director
Utah Health Information Network