May 21, 2024

Micky Tripathi, PhD, MPP
National Coordinator
Office of the National Coordinator for Health Information Technology (ONC)
Department of Health and Human Services
Hubert Humphrey Building, Suite 729
200 Independence Avenue SW Washington, DC 20201

Submitted electronically to:

Re: ONC’s Standards Version Advancement Process (SVAP)

Dear Dr. Tripathi:

Health Level Seven (HL7) International welcomes the opportunity to submit comments on ONC’s Standards Version Advancement Process (SVAP) permitting health information technology (IT) developers to voluntarily update health IT products certified under the ONC Health IT Certification Program (Certification Program) to newer versions of adopted standards as part of the “Real World Testing” Condition and Maintenance of Certification requirement (§ 170.405) of the 21st Century Cures Act. As you know, HL7 is the global authority on healthcare interoperability and a critical leader and driver in the standards arena.

We appreciate ONC’s on-going effort to drive innovation through SVAP and related initiatives. HL7’s specific feedback mapped to the SVAP is detailed below and includes recommendations from members of HL7’s Clinical Quality Information Work Group, Policy Advisory Committee and HL7 leadership. Additionally -- as an overarching SVAP comment -- HL7 observes that ideally, ONC would allow standards upversioning to link directly to the main site for the standard and not a specific version of that standard. If this scenario is not currently possible, HL7 has provided the most recent versions of the standards referenced in this response letter.

Should you have any questions about our attached comments, please contact Charles Jaffe, MD, PhD, Chief Executive Officer of Health Level Seven International at cjaffe@HL7.org or 734-677-7777. We look forward to continuing this discussion and offer our assistance to ONC.

Sincerely,

Charles Jaffe, MD, PhD
Chief Executive Officer
HL7 International

Julia Skapik, MD, MPH
Board of Directors, Chair
HL7 International

Charles Jaffe, MD, PhD
Julia Skapik, MD, MPH
## HL7 SVAP Responses

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<td>§ 170.315(c)(1) - Clinical quality measures (CQMs) — record</td>
<td>§ 170.205(h)(2)</td>
<td>§ 170.315(c)(1) - Clinical quality measures (CQMs) — record and export</td>
<td>§ 170.315(c)(2) - Clinical quality measures (CQMs) — import and calculate</td>
<td>HL7 CDAM R2 Implementation Guide: Quality Reporting Document Architecture: Category I (QRDA I); Release 1, DSTU Release 3 (US Realm), June 2015</td>
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### Regulatory Citation

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<th>Certification Reference</th>
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<tr>
<td>general</td>
<td>Explain &quot;(Available mm/dd/yyyy)&quot; at the bottom of every standard. It does not seem to be a date used in the standard itself.</td>
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<td>§ 170.205(h)(2)</td>
<td>• In the Approved Advanced Version(s) column, HL7 recommends changing &quot;DSTU&quot; to &quot;STU&quot; in the standard name.</td>
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| § 170.205(h)(3)    | § 170.315(c)(3) - Clinical quality measures (CQMs) — report | • Remove both 2022 and 2023 Implementation Guides (IGs) from the Approved Advanced Version(s) column.  
• Add the CMS Implementation Guide for Quality Reporting Document Architecture; Category I; Hospital Quality Reporting; Implementation Guide for 2024; Version 1.1; 08/31/2023  
  o This is the same as the "New version under consideration" in the “Current Standard …” column  
  o HL7 agrees it should be added to SVAP.  
• HL7 suggests to have the hyperlink to [https://ecqi.healthit.gov/qrda](https://ecqi.healthit.gov/qrda) instead of a specific version of the IG. |
| § 170.205(k)(3)    | § 170.315(c)(3) - Clinical quality measures (CQMs) — report | • Remove both 2022 and 2023 IGs from the Approved Advanced Version(s) column.  
• Add the CMS Implementation Guide for Quality Reporting Document Architecture; Category III; Eligible Clinicians Programs; Implementation Guide for 2024; Version 1.1; 11/22/2023  
  o This is the same as the "New version under consideration" in the “Current Standard …” column  
  o HL7 agrees it should be added to SVAP.  
  o The title of the standard does not have “and Eligible Professionals”  
• HL7 suggests to have the hyperlink to [https://ecqi.healthit.gov/qrda](https://ecqi.healthit.gov/qrda) instead of a specific version of the IG. |