August 15, 2016

Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Centers for Medicaid and CHIP Services  
Baltimore, MD 21244-8013

Submitted electronically to: mmis_mes_certification@cms.hhs.gov

Re: Request for Information: Modular Solutions for Medicaid IT enterprise and Pre-certification of Solutions

To Whom It May Concern:

Health Level Seven® (HL7®) International welcomes the opportunity to submit suggestions to the Centers for Medicare & Medicaid Services (CMS) for structuring a process whereby vendors can voluntarily pre-certify their Medicaid Management Information Systems modules. This Request for Information (RFI) was published by CMS on January 14, 2016 on the Medicaid.gov site

HL7 is a not-for-profit, ANSI-accredited standards developing organization dedicated to providing a comprehensive framework and related interoperability standards, including Fast Healthcare Interoperability Resources (FHIR) and Consolidated Clinical Document Architecture (C-CDA). HL7 is comprised of more than 1,600 members from over 50 countries, including 500+ corporate members representing healthcare providers, government stakeholders, payers, pharmaceutical companies, vendors/suppliers, and consulting firms.

HL7 applauds CMS’ desire and efforts to improve the Medicaid enterprise system and supports development of a program/process to pre-certify MMIS modules as a means of streamlining certification of those modules once they are integrated into an MMIS.

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 CMS as needed.

Sincerely,

Charles Jaffe, MD, PhD  
Chief Executive Officer

Patricia Van Dyke  
Board of Directors, Chair

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<th>CMS Question</th>
<th>HL7 Response</th>
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<td>1. Would voluntary pre-certification of modules:</td>
<td><strong>HL7 Response:</strong></td>
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<td>o Spur innovation in Medicaid Enterprise information technology? Why or why not?</td>
<td>HL7 feels that voluntary pre-certification of modules would spur innovation in Medicaid Enterprise information technology. We recommend this be accomplished via a self-assessment supported by a FHIR-based API. This approach will, in our opinion, spur innovation on a common platform and encourage a common approach to interoperability.</td>
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<td>o Accelerate development of interoperability between modules? Why or why not?</td>
<td>As the Argonaut and other FHIR-related projects have proven, the healthcare community is rallying around the FHIR platform and leveraging its advantages to produce a number of innovative solutions. Medicaid Information Technology is well positioned to take advantage of the active community of FHIR-developers and implementers to improve its enterprise.</td>
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<td>o Accelerate adoption of modular MMIS? Why or why not?</td>
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<td>o Be advantageous to your organization? Why or why not?</td>
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17. If your organization produces or uses a state-level analytic tool, does it provide an API?
   - What types of information can be shared and how?
   - What is the architecture of the module API (Simple Object Access Protocol [SOAP], Representational State Transfer [REST], etc.)?
   - What standards is your state currently using or planning to use from the Office of the National Coordinator for Health Information Technology (ONC) Interoperability Standards Advisory with respect to the data warehouse?
   - What data formats may be necessary to ensure interoperability (e.g., Fast HealthCare Interoperability Resources [FHIR], Health Level 7 [HL7v2], Consolidated Clinical Document Architecture [C-CDA])?
   - How is interoperability designed into the module?
   - With what other systems does the module successfully interoperate?

HL7 Response:

As CMS is aware, HL7 Version 2, the Consolidated CDA (C-CDA) and FHIR are all standards produced by HL7 and used extensively within the Medicaid IT enterprise. We recommend that these standards continue to be used in any pre-certification solution. In particular, FHIR, which represents the next generation of HL7 standards and also intends to eventually incorporate many of the functions of v2 and C-CDA, enables the sharing of many kinds of healthcare data – as documents, messages, and services -- as a comprehensive healthcare interoperability platform. The FHIR platform is a REST-based architecture. While FHIR is neither a data model nor data warehouse, FHIR resources are extremely well suited to data warehouse architectures. As the Argonaut Project and other FHIR-based projects have proven, FHIR is easy to learn and implement and is already supported by most of the major health IT vendors.

HL7 also feels that continued use of its HL7 V2 and C-CDA will be essential to ensure interoperability among many existing systems and HL7 plans to offer a migration path from these current standards to FHIR.