App Gaps and Challenges: Mobile Health WG Perspective

Mobile Health

September 2016

Working Group Meeting

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Why this Panel Discussion?

- Rapid proliferation of Mobile Health (MH) apps
- Both HHS and HL7 have identified:
  - Risks or dangers needing mitigation
  - Confusion or unawareness in consumers
  - Gaps in regs/standards/guidance for entities not covered by HIPAA (NCEs), e.g., MH apps
- What could regulations, standards, guidelines, endorsements, testing or certification be based on?
- Overlap/synergy with Consumer Mobile Health Functional Framework (cMHAFF)

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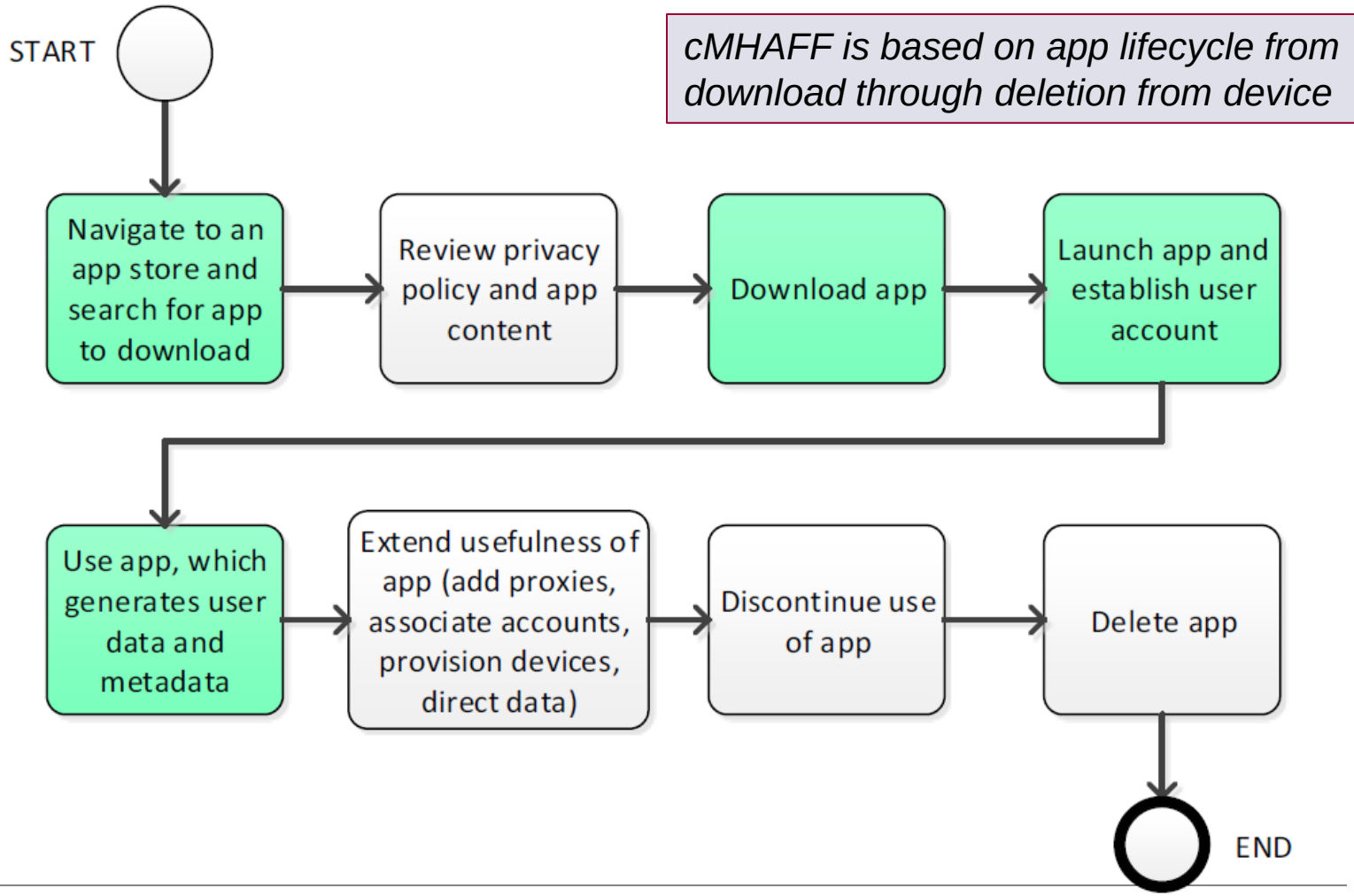
Mobile App Lifecycle



cMHAFF is based on app lifecycle from download through deletion from device

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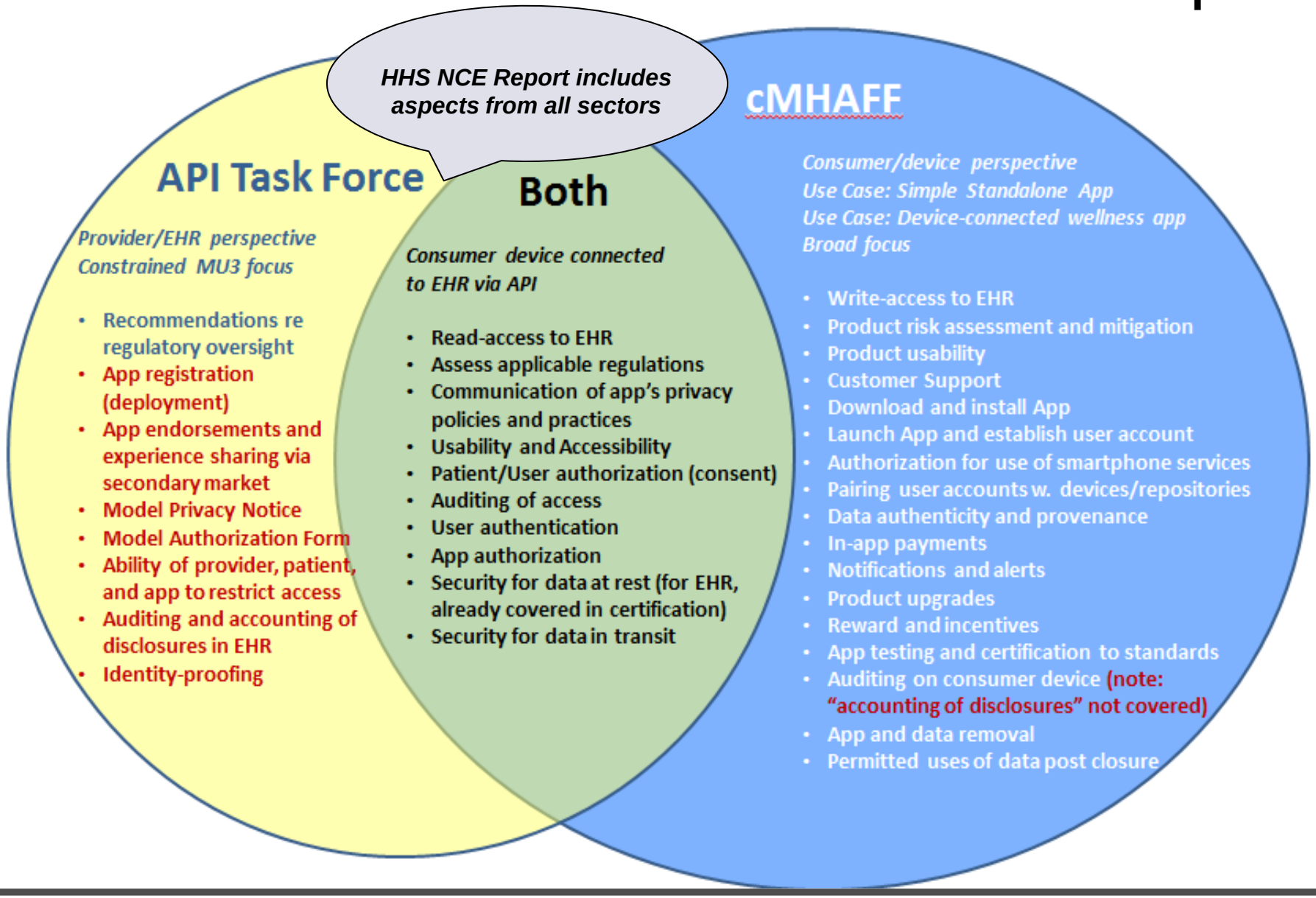
cMHAFF and API Task Force Scope



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Addressing USA National Gaps

- Opportune time for HL7/cMHAFF to consider
  - ONC Report: Gaps in Oversight of Non-Covered Entities (MH apps, social media, PHRs)
  - HIT Joint Committees API Task Force
  - FTC, OCR, HIPAA, FDA… direct or indirect guidance
  - ONC PHR Model Privacy Notice: applicable to MH?
  - MH platform-specific guidelines (e.g., new for iOS)
- Balance benefit vs burden; innovation vs chaos
- Comment-only cMHAFF ballot gives leeway for broad changes to meet emerging needs

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Next Steps and Collaboration

- HL7
  - Mobile Health WG
  - Possible involvement from other WGs, e.g.,
    - Security WG
    - EHR WG
    - Community Based Collaborative Care
- Other private sector MH initiatives?
- Federal Government
  - What HHS/ONC initiatives are planned?
  - Plans of other agencies or organizations?

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