



# HL7 Policy Advisory Committee

Q2 Wednesday, 16 May 2018

Salon 9, Rhein Room, Maritim Hotel Cologne

# HL7 PAC Agenda

1. Call for co-chairs to submit comments on US HHS IPPS regulations
2. Regulatory and legislative outlook – possible future items
3. Discussion of HL7 PAC scope of work
4. Discussion of HL7 public policy principles for standardization
5. Other business

# Call for comments on US DHHS CMS IPPS proposed regulations and US House E&C RFI

CMS IPPS NPRM comment letter to include:

- Positive support for CCDA and other document types
  - “Rightsizing” data and documents w/r/t minimum necessary, other rules
  - Reference new doc type templates for discharges & encounters
- eRx use of CDS hooks (pharmacy use of PDMP)
- Patient access policy

E&C RFI response letter to include:

- Narrow comments on standards lifecycle
- Policy for support of legacy standards (vs rapid stds upgrades)
- Need to gain comments from Health Care Devices co-chairs

# Regulatory and legislative outlook

Expected upcoming items and discussion of PAC perspectives

- CMS as the new locus of US interoperability policy
  - Where will USCDI be governed?
- Lack of coordination and consistency in interoperability policy
  - How to encourage & support interagency coordination?
  - Role for HHS CIO, HHS CTO, or ASPE – esp. regarding regulatory burdens
  - Burden of devolution to states, burden of lack of coordination and consistency
- TEFCA
  - Support USCDI. Possible outreach to HITAC subgroup on USCDI?
  - Tie USCDI to reasonable & necessary under info blocking?
  - Focus on standards lifecycle and cross-SDO coordination
  - Where and how does a minimum necessary information condition apply?

# Discussion of PAC scope of work outside ONC

- HL7 policy influence outside the US
  - Interoperability outside US and cross-border
  - Possible IAPP joint white paper on GDPR? Wayne to reach out to affiliates?
- HL7 policy influence in US (NIH, FDA, CMS, FTC, NIST, States...)
- Privacy & security policies
- Device policies – integration, interoperability, security, maintenance, other
- Policy on non-health care uses of health care data
- Other

# HL7 public policy principles for standards

What does HL7 believe to be good public policy for standards?

- General agreement that developing a set of HL7 public policy principles would be a good use of time for the PAC
  - Comparison to other policy principles? Tom to send new AMIA policy principles
- Policies for standards lifecycle
  - Adoption of STUs, pilot testing, measures of success/ readiness
  - Standards change frequency, migration policy, transition timing
  - Support for legacy standards, backward compatibility?
- Consistency of overall standards frameworks/ bundles
  - Harmonization within purposes of use or within programs
  - Focus on intergovernmental coordination across govts, departments, agencies
- Government role in supporting standards infrastructure, processes, tooling, workforce is necessary to protect national investments in standards
- What is an appropriate market for standards?



Other new business?