

November 17, 2017

U.S. Department of Health and Human Services
Centers for Medicare & Medicaid Services
Innovation Center

RE: CMS: Innovation Center New Direction RFI

To Whom It May Concern:

On behalf of the CARIN Alliance, we are pleased to submit these comments regarding the Centers for Medicare & Medicaid Services (CMS) Center for Innovation (CMMI) Request for Information (the RFI). We are pleased to see the section regarding “Consumer-Directed Care and Market Based Innovation Models” to engage the consumer and their authorized caregiver directly in care delivery and the exchange of health information and want to provide some options for CMS to consider.

About the CARIN Alliance

The CARIN Alliance is a non-partisan multi-sector group of stakeholders representing numerous hospitals, thousands of physicians, and millions of consumers and their authorized caregivers. The CARIN Alliance is convened by David Blumenthal, David Brailer, Aneesh Chopra, and former HHS Secretary Mike Leavitt, to unite industry leaders in advancing the adoption of consumer-directed exchange across the U.S. Working collaboratively with government leaders, the group seeks to rapidly advance the ability for consumers and their authorized caregivers to easily get, use, and share their digital health information when, where, and how they want to achieve their goals.

Specifically, we are working towards the ability for consumers and their authorized caregivers to gain digital access to their health information via the APIs that will be made available under the MIPS/Stage 3 Meaningful Use (MU) ACI objectives and the use of 2015 Edition CEHRT to have that information sent to any third-party application they choose. Ideally, we are working towards the ability for any consumer or their authorized caregiver to use any third-party application to access their health information from any provider who is participating in the MIPS program and/or has implemented the APIs.

With a membership composed of patients and caregiver organizations, health care entities, health information technology application vendors, major EHR vendor, and others, the CARIN Alliance is uniquely positioned at the intersection of public and private organizations to advance the development of person-centered, value-driven health care through the adoption of consumer-directed health information exchange.

Consumer-Directed Care & Market-Based Innovation Models

Much like CMS, the CARIN Alliance believes in the value for consumers, and beneficiaries, to be empowered to drive change through their choices in the health system. We believe that consumer-directed care models that allow consumers and their authorized caregivers to have access to their own health information is essential to moving forward with innovative care delivery. The CARIN Alliance supports the goal of better informing consumers about cost and quality of their choices and believes

that finding models that support consumer-directed exchange of health information is the way to facilitate this type of cost information sharing. The CARIN Alliance also supports greater individual access to clinical health information. We believe this is important in moving forward with innovative models for patient engagement.

In developing these models, the CARIN Alliance believes that models should not focus on specific technologies, but rather focus on promoting open standards and supporting outcomes. Specifically, we believe that CMS and CMMI should support models that will incentivize consumer-directed exchange and open standards to more effectively streamline the ability for consumers and their authorized caregivers to get access to their health information across multiple provider systems. We believe that pilot programs should focus on engaging consumers in care coordination, care planning, and shared decision making. These activities are well supported and bolstered by information access and can lead to better engagement and health outcomes.

Our recommendations for CMS and CMMI include the following:

- CMMI should fund pilot programs that promote the ability for consumers and their authorized caregivers to get access to their electronic health information through the use of API-enabled health IT tools across multiple systems
- These CMMI pilot programs should focus on one or more than one of the following concepts:
 - The ability to streamline how consumers and their authorized caregivers get access to their health information across multiple providers, sectors, and EHRs
 - Leverage the work of the Office of National Coordinator for Health IT (ONC) related to the Trusted Exchange Framework and Common Agreement for sharing information
 - Promote pilot programs that encourage the development of consumer-facing technology and/or services that leverage, enhance, or build upon EHR technology
 - Promote volunteer incentive pilot payment programs that support consumers and their authorized caregivers to better understand and manage both their chronic and acute health care needs through the use of third-party health applications
 - Develop volunteer pilot incentive payment programs that reward health care organizations who promote and support cost and quality transparency information that is provided to consumers and their authorized caregivers in a machine-readable format
 - Develop volunteer pilot incentive payment programs that reward third-party applications who help increase quality, provide better health care outcomes, or help consumers make more informed choices about their health and wellbeing
 - Develop volunteer pilot incentive payment programs that reward providers who provide consumers with transparent cost and quality information so they can better engage in their care and make informed decisions

Thank you again for your consideration of our comments and recommendations. If you have any questions, please feel free to contact us at ryan.howells@leavittpartners.com.



Ryan Howells
Principal, Leavitt Partners
The CARIN Alliance