

November 20, 2017

U.S. Department of Health and Human Services
Office of the National Coordinator for Health IT
200 Independence Avenue, S.W.
Washington, D.C. 20201

RE: 2018 Interoperability Standards Advisory (ISA)

To Steve Posnack:

On behalf of the CARIN Alliance, we are pleased to submit these comments regarding the 2018 Interoperability Standards Advisory (ISA).

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 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. We are committed to enabling consumers and their authorized caregivers to get easy access to their personal health information. Specifically, we are promoting the ability for consumers and their authorized caregivers to gain digital access to their health information via the open APIs made available in 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. With a membership composed of patients and caregiver organizations, health care entities, health information technology vendors 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.

In summary, we believe the following

- Consumer-directed exchange supports sharing of personal health information with non-covered entities which are not regulated by HIPAA and therefore not subject to the same privacy and security rules as providers, plans and clearinghouses
- Consumers and their authorized caregivers should easily be able to get, use, and share their digital health information when, where, and how they want to achieve their goals.
- One of the most important issues to solve to advance consumer-directed exchange and promote widespread adoption is the ability to identity-proof and authenticate individuals across systems in a consistent, reliable, and trusted way.

Importance and Incorporation of Full Implementation Guides for APIs

We believe that having reference to an implementable standards package that is consensus-based gets the industry closer to a plug and play system that is able to connect systems while managing integrated security requirements. A robust implementable standard must be recommended otherwise there will be variances in things such as vocabulary and security. The CARIN Alliance supports the Argonaut Data Query Implementation Guide 1.0.0, which is based upon the FHIR DSTU2 API standards. The CARIN Alliance would recommend it becomes the current implementation specification to View, Download, and Transmit Data from the EHR. We would also recommend the FHIR DSTU3 standard as the emerging implementation specification. We would also suggest adding another category within section III-J *Consumer Access / Exchange of Health Information* entitled *Patient access to health data through third-party applications* and include the [SMART on FHIR](#) protocol that uses OAuth 2.0 and Open ID Connect as the Implementation Specification to link applications to Electronic Health Records.

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.

A handwritten signature in dark ink that reads "Ryan Howells".

Ryan Howells
Principal, Leavitt Partners
The CARIN Alliance