

**Date:** June 30, 2017  
**To:** National Quality Forum  
**Subject:** Draft Report of Measurement Framework to Assess Nationwide Progress Related to Interoperable Health Information Exchange to Support the National Quality Strategy

The following comments correspond with specific sections in the draft report of the *Measurement Framework to Assess Nationwide Progress related to Interoperable Health Information Exchange to support the National Quality Strategy*. Lantana appreciates the opportunity to offer opinion and participate in the development of this framework.

### Executive Summary

**Statement (pg. 3, paragraph 1):** “The definition of interoperability with respect to health IT means health information technology that (1) enables secure exchange and use of electronic health information without special effort by the user; (2) allows for complete access, exchange, and use of all electronically accessible health information for authorized use; and (3) does not constitute information blocking.”

**Comment:** Interoperability also supports aggregation of information from disparate systems in a single source.

**Statement (pg.3, bullet 4):** “Interoperability needs will differ depending on the care setting”

**Comment:** This bullet seems redundant and vague compared to the earlier point that states, “Various stakeholders with diverse needs are involved in the exchange and use of data, and the use of this framework and measure concepts will differ based on stakeholder perspectives”. The bullet is not a complete sentence closed with a period, but should be to align with the other list items.

**Recommendation:** Lantana suggests removing this bullet point or clarifying how this point differs from the preceding items. Lantana also suggests rewriting this bullet point to end with a period to align with the other items in the list.

### Introduction

**Statement (pg. 5, paragraph 1):** “Healthcare organizations depend on efficient and secure means for computer systems and applications to communicate and exchange clinical data to support better care management for patients, preventive care, and population health management.”

**Comment:** Healthcare organizations depend on accurate and comprehensive data exchange to support safe management of care for patients. This statement will benefit from additional language for clarification.

**Recommendation:** Lantana recommends adding the words “accurate” and “comprehensive” to this section. The updated statement will read: “Healthcare organizations depend on accurate, comprehensive, efficient and secure means for computer systems and applications to communicate and exchange clinical data to support better care management for patients, preventive care, and population health management.”

**General Comment:** Consider mentioning the value of iterative interoperability development and incremental pilot testing as part of the progress towards NQF’s goals.

## Guiding Principles

**Subheading:** Interoperability is more than EHR to EHR

**General Comment:** Lantana believes interoperability exists within an “EHR” as well, especially when systems within a hospital need to share data as a single information unit.

**Subheading:** Stakeholder Involvement

**Statement (pg. 10, bullet 4):** “The ability of this stakeholder to catalyze interoperability can serve as a driver for improvement in healthcare quality and value—particularly in the efforts of prevention and health promotion—and can lead to cost savings for both public and private insurance programs.”

**Comment:** Consider expanding this description to include the cost savings impact of public health surveillance with prevention and health promotion efforts

**Recommendation:** Lantana recommends adding the term “public health surveillance” to this section. Lantana suggests that the updated statement reads:

“This stakeholder catalyzing interoperability can drive improvement in healthcare quality and value—particularly in the efforts of prevention, health promotion, and public health surveillance—and can lead to cost savings for both public and private insurance programs.”

**Subheading:** Differences Due to Settings

**General Comment:** Consider emphasizing a core, common clinical data set for exchange at minimum. Lantana recognizes diverse settings have varying data needs.

**Subheading:** Various Data Types

**General Comment:** Consider mentioning the development of a core set of non-clinical data for exchange in non-clinical settings, such as jails, schools, and social services.

## Exchange of Electronic Health Information

**Subheading:** Quality of Data Content

**General Comment:** This measurement focuses on validation for sent, viewed, and downloaded data. Lantana suggests clarifying whether the scope includes criteria to identify gaps in the sent or downloaded content, and how NQF will assess and quantify missing data.

**Subheading:** Relevance

**Statement (pg. 13, paragraph 4):** “This includes measures and/or measures concepts addressing timeliness, accessibility, and clinical completeness of the data.”

**Comment:** This subdomain includes the measurement of “clinical completeness of the data”. Consider adding details to the explanation or providing the planned criteria to determine whether “clinical completeness” exists.

## Appendix A: List of Measure Concepts

**Recommendation:** Lantana recommends evaluating the measures in Appendix A against the feasibility assessment criteria in the MMS Blueprint<sup>1</sup> and gathering additional details on data accuracy, data availability, standards use, and terminology.

## General Comments

ONC's Proposed Interoperability Standards Measurement Framework<sup>2</sup> contains two measurement types: implementation specification measures and use measures. Some of ONC's measurement areas coincide with the NQF domains and subdomains while others differ. For example, the NQF Domain "Exchange of Electronic Health Information" and subdomain "Method of Exchange, Quality of Data Exchange" coincides with the ONC measurement type "Implementation Specification Measures" and measurement area "Standard on Development plan". Lantana recommends combining the two interoperability measurement frameworks and creating a prioritized plan for execution.