

A Public Comment submitted to CT Health Information Technology Advisory Council

By Supriyo B. Chatterjee MSc MBA MA (Econ)¹

March 19, 2020

I am in the healthcare policy and information technology (HIT) sector for economic development in Connecticut. I work with small startup businesses, major corporations, hospitals, non-profits, and academic institutions (UConn & Yale Universities). I am part of the State Innovation Model (SIM) program in the Practice Transformation Task Force (PTTF) group. I am also a Connecticut Health Foundation Healthcare Leadership Fellow.

HIT Ecosystem

In my earlier testimonial submitted² on Sept 19, 2019 to the Health Information Technology Council Advisory Council – I had emphasized the need to build a state HIT ecosystem that encompasses the high-tech innovations from startup entrepreneurs into the state's HIT infrastructure. I would like to briefly outline why this is an imperative due to release of the recent rulings from the HHS.

New Rulings from US Dept of Health & Human Services (HHS)

On March 9, 2020 HHS released transformative rulings that further empowers the patient consumer over their healthcare records³ and “Unleashing Innovation & Patient Access.” The new HHS Interoperability and Patient Access final rule (CMS-9115-F)⁴ has several technical development items that will need to be addressed: Patient Access API, Provider Directory API, Payer-to-Payer Data Exchange, Dual Eligibility Data Exchanges, Public Reporting and Information Blocking, Digital Contact Information, and ADT (Admission, Discharge, and Transfer Events) Notifications.

Impact on the health-tech startups and health IT developers

With the introduction of the new technical items – the health-tech startups and health IT developers would need to have a deep understanding of the state HIT infrastructure and applications. *As such, availability of technical documentation of the state HIT Infrastructure - HIE, APCD, and CDAS systems could be helpful.* This can be done without divulging any security aspects of the related systems. Document repositories with version control and authenticated access such as GitHub⁵ can be beneficial. Periodically updated documents showing architectures, schemas, systems requirements, and technical diagrams can provide insights. Such documents need not contain security-related information.

Thank you.

¹ West Hartford CT c: 860.897.2261 e: sb.chatterjee@gmail.com

² OHS_HIT_Advisory_Council_Public_Comment_20190919 [PDF] – also attached
<https://portal.ct.gov/OHS/HIT-Work-Groups/Health-IT-Advisory-Council/Meeting-Materials/September-19-2019>

³ HHS Finalizes Historic Rules to Provide Patients More Control of Their Health Data - CMS March 9, 2020
<https://www.hhs.gov/about/news/2020/03/09/hhs-finalizes-historic-rules-to-provide-patients-more-control-of-their-health-data.html>

⁴ Interoperability and Patient Access Fact Sheet - CMS March 9, 2020
<https://www.cms.gov/newsroom/fact-sheets/interoperability-and-patient-access-fact-sheet>

⁵ GitHub repository - Healthcare topics
<https://github.com/topics/healthcare>

**A Public Comment submitted to CT Health Information Technology Advisory Council
Meeting on Sept 19th, 2019
By Supriyo B. Chatterjee MSc MBA MA (Econ)⁶**

I am in the healthcare information technology (HIT) sector for economic development in Connecticut. I work with small startups and major corporations, hospitals, non-profits, and academic institutions (UConn & Yale Universities). I am part of the State Innovation Model (SIM) program in the Practice Transformation Task Force (PTTF).

HIT Ecosystem

High tech HIT innovations are occurring with small startup entrepreneurs that are within academic settings. These cutting-edge technologies target far-sighted horizons using platforms⁷ and ecosystems⁸. Technologies include Big Data, Advanced analytics, Artificial Intelligence (AI), Blockchain, Cloud computing, and more. The state has large development projects like the Health Information Exchange (HIE), APCD (Claims database), and CDAS (Analytics). I have found that the external entities – organizations large and small startups, have a need to get their bearings in the state's HIT ecosystem. I would like to briefly outline a few topics below that will help promote the HIT ecosystem.

Availability of systems documentation

Technical documentation of HIE, APCD, and CDAS systems should be made readily available. Document repositories with authenticated access such as GitHub⁹ can be beneficial. Documents showing architectures, schemas, systems requirements, and technical diagrams can provide deep insights. An example in the use of GitHub was displayed in the recent UConn MedRec Hackathon.

Data quality and procedures - DataOps¹⁰

Healthcare analytics demands not only data quality but a process-oriented methodology that is automated for timely delivery. Data security and data ownership¹¹ are also of paramount importance.

⁶ West Hartford CT c: 860.897.22617 e: sb.chatterjee@gmail.com

⁷ Bringing the Power of Platforms to Health Care (via Harvard Business Review)
<https://hbr.org/2016/11/bringing-the-power-of-platforms-to-health-care>

⁸ Insurance beyond digital: The rise of ecosystems and platforms (via McKinsey)
<https://www.mckinsey.com/industries/financial-services/our-insights/insurance-beyond-digital-the-rise-of-ecosystems-and-platforms>

⁹ GitHub repository - Healthcare topics
<https://github.com/topics/healthcare>

¹⁰ 3 reasons why DataOps is essential for big data success (via IBM)
<https://www.ibmbigdatahub.com/blog/3-reasons-why-dataops-essential-big-data-success>

¹¹ Hugo Health - Data ownership platform
<https://hugo.health/>

Healthcare startups need data access be secured and made available, preferably in real-time. This is crucial in AI applications that require pristine datasets. DataOps can provide best practices and procedures to meet demands and do it uniformly, across participating organizations in the ecosystem.

HIT Platforms and Ecosystem – Application Program Interface (API)

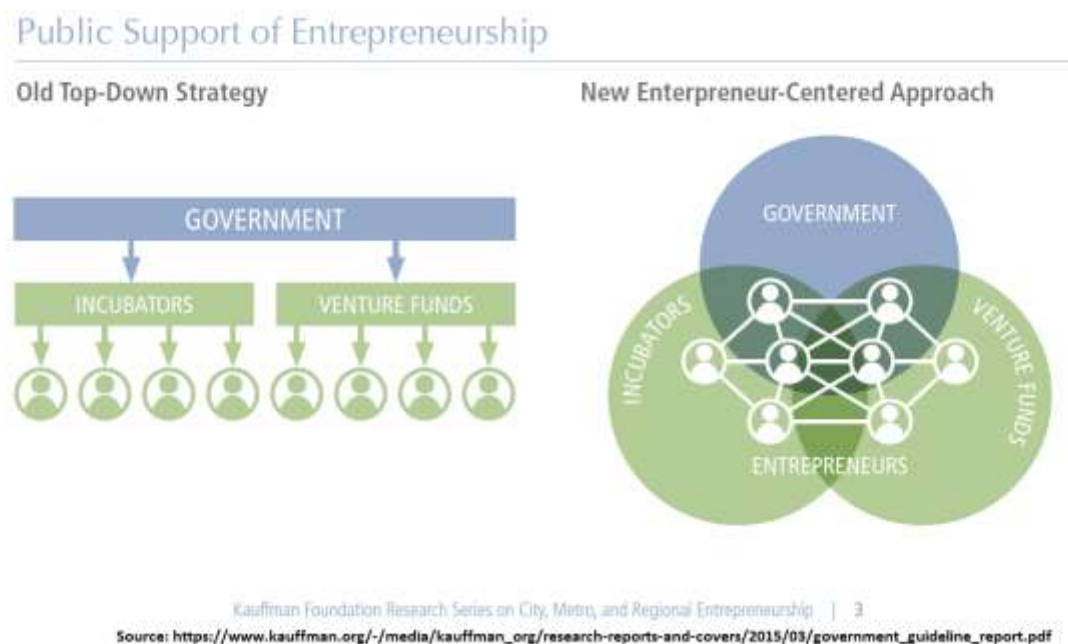
Large scale applications that perform computations and generate reports utilize a ‘platform’ architecture to address complexity and flexibility for changes and growth. APIs provide the mechanisms to achieve the flexibility. Programmatic access to datasets behind reports provide versatility in analytics and to integrate it with other datasets. An example of APIs FHIR and HL7 was shown in the recent UConn MedRec Hackathon.

Growing HIT Ecosystem with entrepreneurship

Growing HIT ecosystem with startup entrepreneurship can be done by via programs and activities that bring technologists and clinicians together to explore innovation (e.g., Yale Healthcare Hackathon). The growth of startups in the cluster will be dependent upon a collaborative HIT ecosystem.

Thank you.

Figure - Public Support of Entrepreneurship¹²



¹² Guidelines for Local and State Governments to Promote Entrepreneurship (Kauffman Foundation, March 2015)
<https://www.kauffman.org/what-we-do/research/city-metro-and-regional-entrepreneurship/guidelines-for-local-and-state-governments-to-promote-entrepreneurship>