



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Secretary

Office of the National Coordinator
for Health Information Technology
Washington, D.C. 20201

TO: Julie A. Wise, OMB
FROM: Talisha Searcy, Data Analysis Branch Chief
THROUGH: Sherrette Funn
DATE: March 19, 2019
SUBJECT: ICR Reference Number 201810-0955-001

Thank you for your review of ONC's National Survey of Health Information Exchange Organizations (HIO) (ICR Reference Number 201810-0955-001). On February 22, 2019, ONC received the following question from OMB:

- Given that ONC (and CMS) just published a NPRM on interoperability, would the Program please clarify how this ICR fits in with their plans moving forward? For instance, I would have thought the responses to the survey would have been helpful for ONC to have *before* they drafted the current NPRM, and am concerned that the utility of the survey may be diminished now that the NPRM has published (and HIOs/respondents have read about ONC's current thinking). If the timing is such that modifications to the collection need to be made in order to make the collection more useful to ONC – or if the collection is not needed at this time – please let us know.

Based on this question, ONC would like to submit the following response.

- The survey results will be informative to ONC's ongoing strategy related to promoting interoperability. We did not plan for the survey results to inform the creation of the NPRM due to funding and timing constraints. However, this data will be helpful to assess the implementation of certain aspects of the final rule and the forthcoming Trusted Exchange Framework (TEFCA). Therefore, we've included survey content related to both the NPRM and the upcoming TEFCA that were relevant to health information exchange organizations. The survey assesses how health information exchange organizations are: (1) enabling interoperability (e.g., through offering services, adopting and implementing and using standards); (2) identifies the barriers they are encountering (e.g., information blocking, financial challenges) and (3) captures their perceptions regarding potential impact of national policy (e.g., TEFCA) on their operations.
- Though the survey results will not inform the development of the NPRM, it will enable ONC to assess how health information exchange organizations are enabling interoperability more broadly. Thus, OMB review should proceed as planned.

On March 19, 2019, ONC received a notification dated March 15th that ICR 201810-0955-001 was withdrawn. This is incorrect. ONC would like to proceed with this survey in a timely fashion as survey fielding will be conducted via a contract scheduled to end September 30, 2019. Please let us know if you have any questions or would like to discuss the response provided.