

Mariann Yeager
The Sequoia Project
8300 Boone Blvd.
Suite 500
Vienna, Virginia 22182

14 June 2022

Re: Draft QHIN Application

Dear Ms. Yeager,

On behalf of CommonWell Health Alliance, I am pleased to submit comments to the Draft QHIN Application.

CommonWell Health Alliance is a not-for-profit trade association made of various health IT and health care stakeholders. As a membership-based trade association, we provide an environment to openly work on interoperability improvements across many cornerstones of health care including but not limited to technology companies, payers, State and Federal agencies, providers, clearing houses and patients. When the Alliance launched in 2013, we started with services centered around Care Treatment and provided the ability for providers to query across other provider systems and retrieve data about a given patient. We have and continue to be a patient-centered network available nationwide and are proud to have expanded our use case support to other use cases including Patient Access to give individuals the ability to find and access their data through patient portals, personal health records and other patient-centric applications as well as payment and healthcare operations.

CommonWell has a simple vision: health data should be available to individuals and caregivers regardless of where care occurs. Additionally, access to this data must be built into health IT at a reasonable cost for use by a broad range of health care providers and the people they serve. We believe TEFCA is a critical next step in the evolution of clinical data exchange nationwide. CommonWell has the proven track record and scale to be a Qualified Health Information Network (QHIN) and fully supports a national approach to bringing the various networks and frameworks under a unified set of internetwork standards including record location and performance standards.

We were pleased to be part of preliminary efforts to get here through the Common Agreement Workgroup where we worked with peers and partners alongside Sequoia and the ONC towards development of the formative documents for TEFCA which included development of this QHIN Application. As such, we were not surprised by the content of the application and appreciate the consistency throughout the process as well as the changes made along the way to make the process productive for applicants and Sequoia as it evaluates submissions. We eagerly await the publishing and opportunity to comment on the remainder of the schedules and attachments to the Common Agreement as well as the QTF (QHIN Technical Framework) and are here to help in any way we can. We strongly encourage Sequoia to maintain the published release schedule for the remaining content and the submission process so CommonWell and the others in the first cohort of QHINs can soon submit applications, obtain conditional approval and start the process building of TEFCA together this year.

Note on Our Comments

These comments are reflective of the opinions of the Alliance and its members in regard to the objectives of CommonWell. It is not intended to represent the individual comments of each of our Members. Comments made here are not intended to represent the view of any particular member; and we expect some of our members to submit their own comment letters.

Final Comments

The Alliance remains committed to patient-centric interoperability on a national scale with the goal of ubiquitous, secure exchange of clinical data to the benefit of providers, patients, payers, public health and all other stakeholders in health care and beyond. We are encouraged by the mission and vision of the ONC and affirm our commitment to being a strong partner in executing on the vision.

On behalf of the CommonWell Health Alliance, thank you again for the opportunity to comment on the Draft QHIN Application. For any clarification or comments, please feel free to contact me at paul@commonwellalliance.org.

Sincerely,



Paul L Wilder
Executive Director
CommonWell Health Alliance
75 Arlington Street, Suite 500
Boston, MA 02116
paul@commonwellalliance.org