## HIE as an Engineered System

Navigating the HIE Labyrinth
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## **Topics**

1. The current state of EMRs & HIE

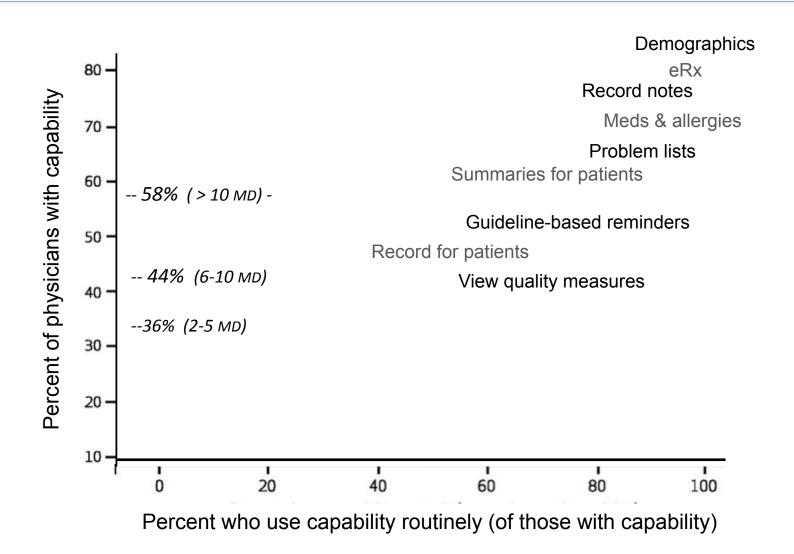
2. The policy labyrinth

3. Engineered systems for policy

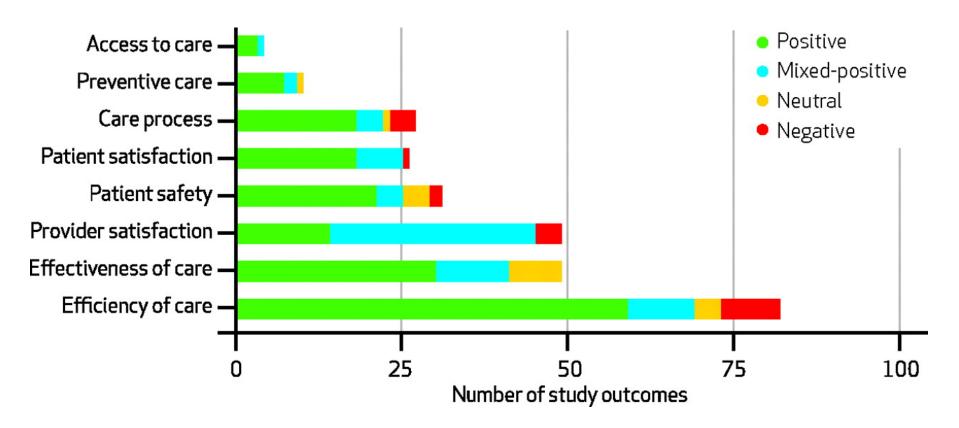
#### Part 1

## The Current State of EMRs & HIE

#### Small offices lag in adoption. Actual office-based use varies



#### Studies of HIT benefits are generally favorable



Source: Buntin et al. Health Affairs. 2011;30:464-471.

Authors' analysis of published peer-reviewed studies. NOTE A total of 278 outcome measures were evaluated across all studies included in our final sample.



So why isn't everyone satisfied?

#### Perhaps EMRs aren't meeting clinicians' real needs

#### Physicians want their EMRs to:

- Routinely confer immediate, dramatic clinical benefits
- Save them time
- Lower their costs
- Increase their revenues
- Mitigate medical & legal risk
- Eliminate administrative coding & other non-clinical work
- Bring knowledge to bear to make them seem smarter
- Require absolutely no change in behavior or office culture
- Serve as effective communication devices

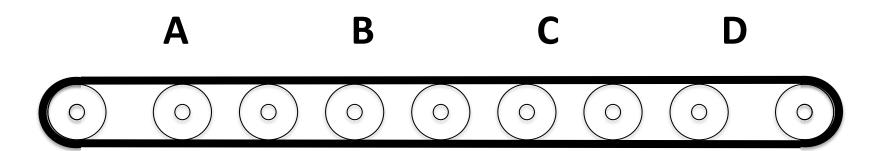
#### EMRs must manage at least 3 different "businesses"

1. EMRs support problem solving and care planning

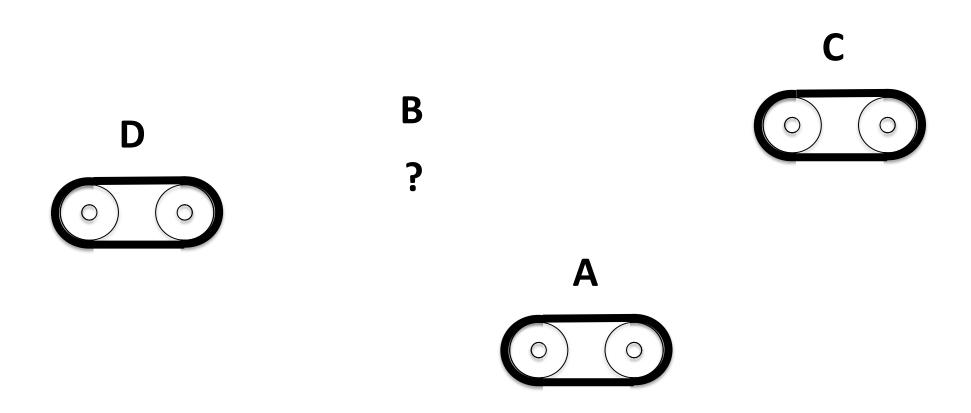
2. EMRs monitor care processes

3. EMRs communicate across organizational boundaries

## EMRs help coordinate and monitor care in hospitals



#### Ambulatory EMRs can't communicate to coordinate



Medicare beneficiaries see at least five different clinicians and many more pharmacists, therapists, and other clinicians.

source: Pham, H.H., et al., Care patterns in Medicare and their implications for pay for performance. N Engl J Med, 2007. 356(11): p. 1130-9.

#### Health information exchange brings EMRs together

# Data are made available to those who require access B

43 states and territories have directed exchange

79,957,695 directed exchange messages\*

20 states have statewide query-based exchange

• 2,794,705 patient queries

Only 4 states and 4 territories report not having any directed or query-based exchange

\* Q3 2012 Data

#### Tripathi: Only a few state HIE programs may be ready to do so

#### Directed transactions

State HIE Grantee	Monthly transactions		
Indiana	14,532,368		
Colorado	5,011,816		
New York	3,322,812		
Minnesota	1,680,124		
Vermont	889,700		
Delaware	827,483		
Washington	138,422		
Michigan	98,976		
Maryland	48,655		
Ohio	35,359		
Rhode Island	29,627		
California	28,439		
Alaska	3,701		
Utah	2,482		

42 remaining HIE activities had fewer than 1,000 monthly transactions

#### Query transactions

State HIE Grantee	Monthly transactions
Indiana	351,070
Texas	215,005
New York	101,748
Kentucky	92,387
South Carolina	50,515
Delaware	37,245
Oklahoma	32,015
Colorado	22,665
Mississippi	12,909
Nebraska	3,459
Tennessee	3,254
Maryland	3,223
Maine	3,211
New Jersey	1,601
Utah	454
Kansas	302
Minnesota	208
New Mexico	165
Rhode Island	130





3.2 million directed exchanges per month



37 remaining HIE activities had no querybased transactions

Source: ONC HIE Dashboard

#### Fortunately, HIE is maturing

# HIC 1.0



# hie 2.0

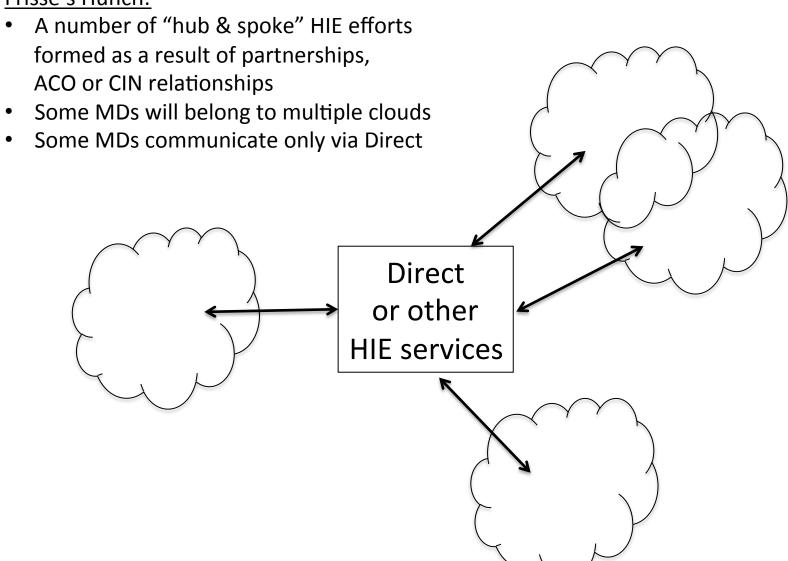
- Focused on "the noun"
- Trying to solve "market failures"
- Multi-entity governance, but often driven by third-party entities
- Strived to solve wide variety of rich use cases through comprehensive interoperability
- Complex legal, business, and technical requirements to support rich array of use cases
- Tried to tackle policy issues to enable business practices and technology solutions

- · Focused on "the verb"
- Demand-driven -- trying to meet market needs
- More tactically focused to meet immediate interoperability needs
- Led by any organization that has business need and ability to marshal financial, technical, and organizational resources
- Designed to fit within existing legal, business, and technical constraints – technology out ahead of policy in some areas

**Tripathi, M**. The Current State of HIE. Presented to HITSC/HITPC Public Hearing on Health Information Exchange. January 29, 2013. http://www.healthit.gov/sites/default/files/currentstatehie hearing012913.pdf

#### Regional HIE as a collection of "enterprise HIE" relationships

#### Frisse's Hunch:



## Health plans' position is advantageous

PAYER-AG	NOSTIC TOOLS†	AETNA	CIGNA	HUMANA	UNITED HEALTH	
	HEALTH INFORMATION EXCHANGE	1		✓	✓	
	DATA EXCHANGE/AGGREGATION	1		✓	✓	
	CARE MANAGEMENT	$\checkmark$			$\checkmark$	
	PATIENT PORTALS/APPS	1			✓	
SERVICES	PERFORMANCE MANAGEMENT	<b>\</b>			✓	
	ACCESS TO CLAIMS DATA	<b>✓</b>	<b>V</b>	<b>V</b>	$\checkmark$	
	CARE GUIDANCE REPORTS	1	$\checkmark$	$\checkmark$	✓	
	CARE COORDINATORS	<b>\</b>	$\checkmark$	$\checkmark$		
	PLAN ADMINISTRATION	<b>✓</b>		<b>✓</b>	<b>✓</b>	
†NOTE: EXCLUDES PROPRIETARY SYSTEMS, SUCH AS PATIEN PORTALS AND PERFORMANCE MANAGEMENT TOOLS COMMO						

Part 1: CONCLUSION

# The EMR & HIE Landscape is changing

#### Part 2

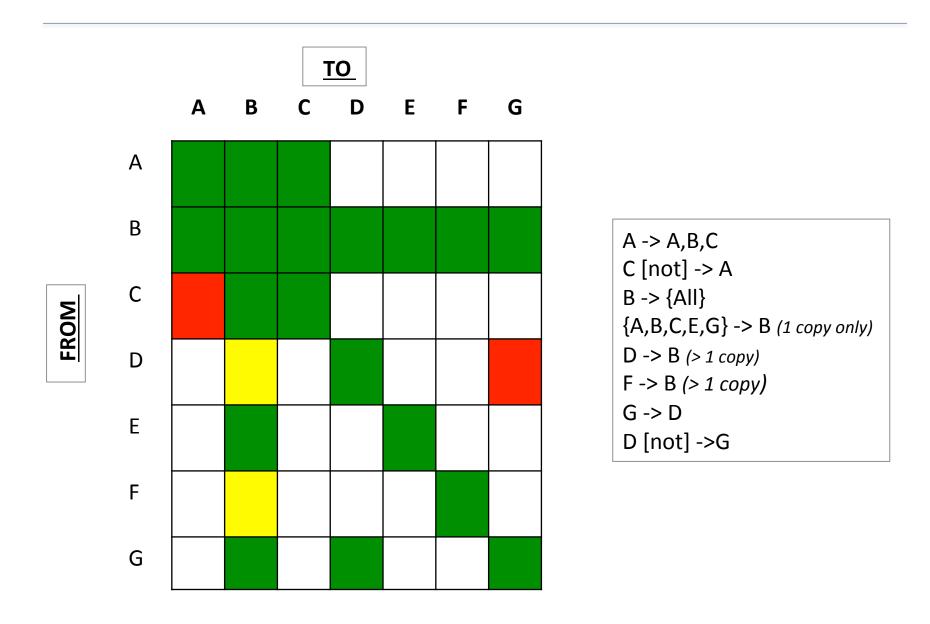
# The Labyrinth of Policy & Technology

#### Governance: Early regional models were difficult to govern

#### Few options

- Global or institutional opt-out
- Progressive opt in
- Repudiation & referential integrity
- Use limited to support direct patient care
- Anti-trust concerns when cost or quality efforts are considered
- Challenging to finance and govern advanced use where members use HIO data not only to provide care but also to compete with one another.

#### Tech: Direct messages can lead to asymmetries & redundancies



#### Privacy: Today, everyone has to PAY ATTENTION

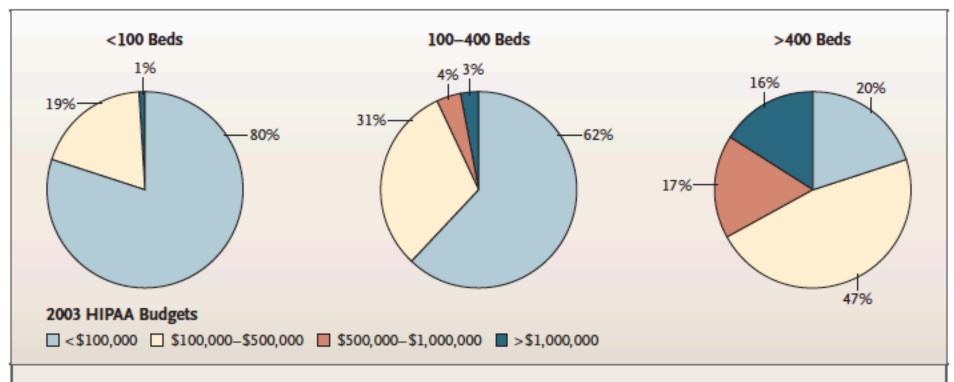
#### 10 years ago – Few really affected

- HIPAA focused on notification of privacy practices
- Most institutional policies not aligned with NHIN / HIE aims
- External audits were infrequent and cumbersome
- HISPC as an intellectual exercise

#### Today

- Everyone is affected
- All access and privacy policies must be aligned
- Legal and administrative costs of enforcing Omnibus rule and MU may be on par with costs of enforcing original HIPAA

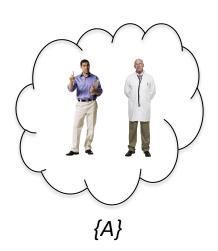
#### HIPAA cost estimates (AHA): \$670,000 to \$3.7 million per hospital

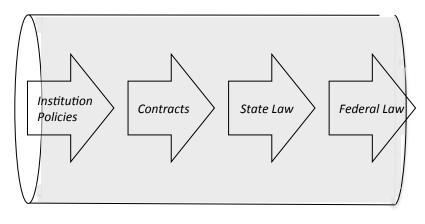


2003 Budgets for HIPAA Compliance, According to Size of Hospital. Data are from the Healthcare Information and Management Systems Society and Phoenix Health Systems.

## Policy: The entire "policy pipeline" must be considered

#### Our goal is ensure that {B} conforms to expectations set forth in {A}







{B}

#### **CONSENT:**

- Context
- Information
- Roles
- Relationships
- Terms

#### USE:

- Context
- Information
- Roles
- Relationships
- Terms

#### Policy: Logical consistency or practicality is elusive in some areas

**Authorization** 

Authentication

Consent

Use

Provenance

Re-transmission

Cash payments

Inconsistent ontologies

Sometimes one cannot create consistent logical models for authorization or access controls.

When models can be created uniform policy enforcement cannot be guaranteed

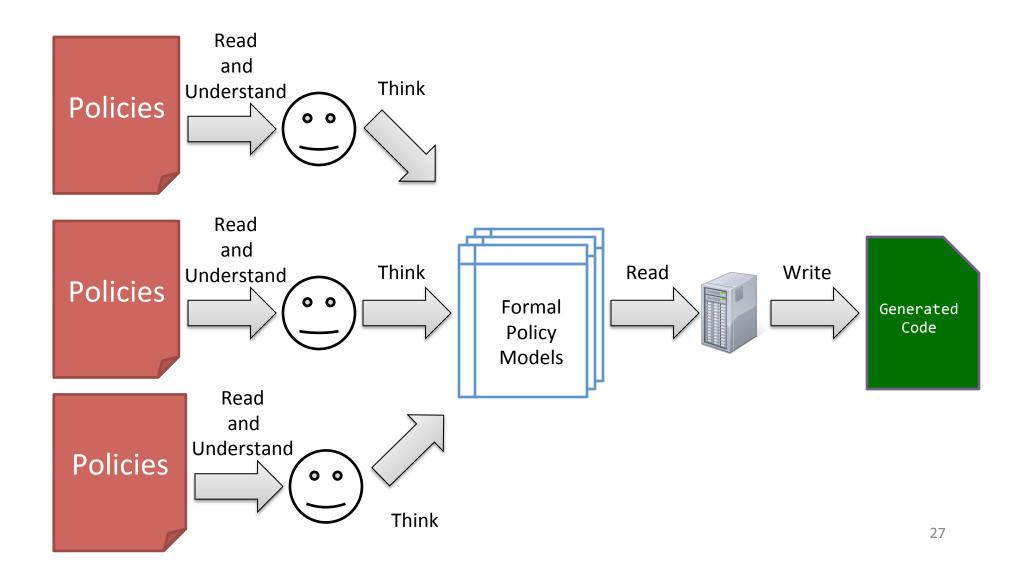
Part 2: CONCLUSION

## Many formidable technical & policy issues

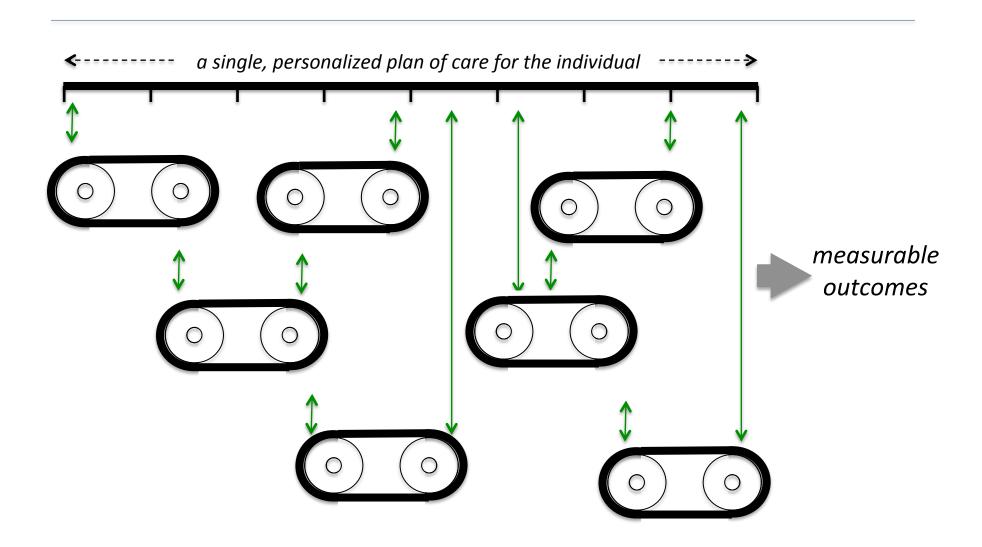
#### Part 3

# Policy as Engineered Systems

## Explicit policy modeling doesn't always work



## We seek a single record and a single coordinated care plan



#### We could engineer a system and try to fit to policies

We could create an unambiguous system for the majority of instances through systems engineering.

#### The process:

- Explore the barriers, face the inconsistencies
- Take an explicit position
- Create and implement a system
- Asses its performance; examine the trade-offs
- Revise and test again

We use the same logic to dictate specific required acts and roles. After providing access, systems advise on what to do

#### We are attempting to do this through PolicyForge



#### We begin with an explicit use case, not the policies

We model federal, state, institutional, ACO, and other relevant business policies

Verify & Model Export Markup and Validate Ontologies **Summarize** (EHR, HIE, Begin with **Policy** • Policies (sets) **Use Cases** relevant etc.) Contradictions and • Use Cases Entailment **Policies Use Case Execution** Define Anchor Policy Match Language Modeling **Ontologies Semantics** Language

Modeling Privacy Aware Health Information Exchange Systems Andras Nadas, Mark E. Frisse, and Janos Sztipanovits International Workshop on Engineering EHR Solutions (WEES), October 2012. Part 3: CONCLUSION

## Consider an engineered systems approach

## Finally

# **Summary Remarks**

#### We are in an era of unparalleled opportunity

New technologies are being introduced at an unparalleled rate
Our workflows and technologies are not coordinated
Our "markets" are immature ("buyer" – "seller" mismatch)
Our reimbursement systems are schizophrenic
Incentives are misaligned
HIE will remain a patchwork for the foreseeable future
Business relationships and consumer engagement will drive the process

The near-term outcome is uncertain