



September 21, 2011

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Office of the National Coordinator for Health IT  
U.S. Department of Health and Human Services

Attention: Metadata Standards to Support Nationwide Electronic Health Information Exchange

Submitted electronically at: <http://www.regulations.gov>

Dear Dr. Mostashari:

The College of Healthcare Information Management Executives (CHIME) appreciates the opportunity to respond to the advanced notice of proposed rulemaking (ANPRM) relating to metadata standards to support nationwide electronic health information exchange.

CHIME's 1,400 members represent chief information officers (CIOs) and other top information technology executives at many of the nation's largest hospitals. CHIME members have frontline experience in implementing clinical systems, and have learned by trial and error what works and what doesn't in implementing such electronic systems and optimizing the value derived from them. Healthcare CIOs share the vision of an e-enabled healthcare system as described by the Centers for Medicare & Medicaid Services (CMS) and the Office of the National Coordinator (ONC) for Health Information Technology.

In a response filed January 2011 with ONC regarding metadata, CHIME strongly urged ONC to work with industry partners to develop and test metadata standards before considering any broader action. Since that time, we have watched with great interest findings uncovered by the ONC-commissioned analysis, the HIT Standards Committee analysis and recommendations, as well as look forward to efforts like Query Health, the Data Segmentation initiative and other planned demonstration projects. And we continue to be encouraged by the work currently underway through the Standards & Interoperability (S&I) Framework.

We are optimistic that ONC and industry partners will continue to break new ground in health IT standards and health IT policy. However, we believe there needs to be a more robust corpus of metadata standards, capable of being operationalized and scaled across the health IT landscape.

Despite the impressive amount of resources put forth on this endeavor, by ONC and others, CHIME simply cannot support the inclusion of metadata standards in the next notice of proposed rulemaking to

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support Meaningful Use Stage 2. We do not believe enough progress has been made, or evidence gathered, to support the technologies and strategies needed to include metadata standards as part of Meaningful Use Stage 2.

We fully agree that the use of metadata holds great promise and the adoption of metadata standards could help rapidly advance electronic health information exchange across a variety of different exchange architectures. But we cannot endorse such a wide-scale pilot project requiring industry to develop and providers to implement in time for Stage 2.

**RECOMMENDATION:** We do not believe that the Meaningful Use regulatory schema is the appropriate venue to mandate unproven standards or incomplete protocols.

Presently, we do not believe there is consensus around HL7 CDA R2 header syntax, or any other metadata standards, that could be implemented across the healthcare ecosystem in time for Stage 2 Meaningful Use. CHIME recommends that ONC push forward with Query Health, Data Segmentation and other initiatives relating to metadata inside the established Standards & Interoperability (S&I) Framework in order to fully vet the range of possible standards and assemble the needed implementation processes. Additionally, ONC should engage hospitals, vendors and health information organizations to determine feasibility for future Meaningful Use certification. However, we do not foresee this scenario happening before Meaningful Use Stage 3.

If ONC is confident robust metadata standards currently exist, CHIME would like to offer its services and assist in establishing implementation guidelines to ensure that protocols can scale across the provider community.

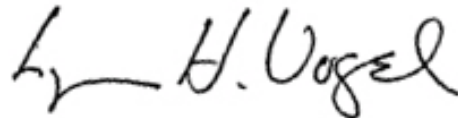
We hope these comments are helpful. If you have any questions about our comments or need more information, please contact Sharon Canner at [scanner@cio-chime.org](mailto:scanner@cio-chime.org).

Sincerely,

Richard A. Correll, President & CEO  
CHIME



Lynn Vogel, Chairman CHIME Board of  
Trustees  
VP & Chief Information Officer,  
The University of Texas M. D. Anderson Cancer  
Center



CC: Mr. Steven Posnack, Office of Policy and Planning