

**Department of Rehabilitative Services (DRS) and Department of General Services
Division of Consolidated Laboratory Services (DGS/DCLS)**

From: Steidle, Ernie (DRS) [<mailto:Ernie.Steidle@drs.virginia.gov>]

Subject: RE: HITSAC and Proposed New Data Governance Framework

Page 5, step 4 - Why would VITA prepare a standards narrative. Isn't the subject matter expert the agency that proposes the standard? and in Step 6, should not the narrative be mutually agreeable to the requesting agency and be submitted by VITA on behalf of the requesting agency?

Page 6, steps 2 and 6 - VITA should have the power to recommend and support or not support an agency request. They should not have the final say or be able to trump an agencies data needs.

The wording is such VITA is an authority to the agency rather than performing a service for the agency.

From: Ruffin, Marshall D. [<mailto:Marshall.Ruffin@inova.org>]

Mr. Steidle,

Thanks for raising these questions. Standardization is indispensable to interoperability. The burden of proof that unique departmental standards should supersede national or international standards needs to fall on the agency and not on VITA, otherwise VITA will have very little authority to drive for shared standards. Selection of standards between an agency and the rest of state government will always be a negotiation, but the final say about which standards are selected needs to be with the central organization advocating for interoperability.

Best wishes,

Marshall Ruffin, MD

From: Steidle, Ernie (DRS) [<mailto:Ernie.Steidle@drs.virginia.gov>]

I agree with most of your point. I agree that the final say on standards for interoperability needs to rest with one organization. I disagree that the organization of choice is VITA. To expect VITA to assume subject matter expertise in any authoritative way is duplication of effort with state agencies. My point is that the narrative relative to need for an external standard or exceptions for an internal standard needs to be a product of mutual agreement between VITA and the requesting agency. Conflicts that will inevitably arise then go to the CIO or Sotech to get sorted out. Requests for approval from the CIO and/or Sotech should be made by VITA as u state, but on behalf of the requesting agency with VITA comment on the suitability of the standard or exception to enterprise interoperability.

Hope this clarifies.

From: Ruffin, Marshall D. [<mailto:Marshall.Ruffin@inova.org>]

Your clarification makes sense to me. What do others think?

Best wishes,

Marshall Ruffin, MD

From: McCleary, Susan (VITA)

Ernie,

Could I get a little more clarification around the following: "I agree that the final say on standards for interoperability needs to rest with one organization. I disagree that the organization of choice is VITA."

Do you have another organization in mind? Or something new?

From: Steidle, Ernie (DRS)

Nothing really new and no new organization. Perhaps an example will help. DGS has been working on a vendor file record to be adopted by all COV agencies. This is an internal standard that does not meet HITSAC needs for a good external standard that is interoperable across ALL user populations and endorsed by the national or international authority for vendor records. DGS is in the best position to know who that standards organization is and the data elements necessary for agencies to support their business processes (and rules) because that is what DGS does. So DGS is the Subject Matter Expert (SME) for vendor records in the COV. VITA is the SME for a metadata file of data elements. They look at normalization, precision of definition, ownership and access rules among many other issues that result in a data interoperability exchange standard.

My point is that VITA should not be in a position of duplicating the SME function for DGS. Both parties should provide SMEs for their positions; DGS for vendor elements and VITA for metadata rules. As a result, a request from an agency to adopt an external standard or modify that standard because of a unique agency need should be a joint exercise, where both parties should be soliciting approval from the CIO and SoTech. As the protocol is proposed, a COV agency solicits approval from VITA and then VITA does the rest. What I am suggesting is that VITA and the agency or agencies needing the data standard are partners throughout the approval process.

Does this help?

From: McCleary, Susan (VITA)

Ernie,

This helps and I think the section in the document related to internal standards reflects this approach. I can see where you are heading but think that external standards pose a different set of questions, especially around scope of applicability.

To put my question in the form of an example -- In the instance below, DGS is clearly the best source of knowledge on a data standard for vendor. But if we are talking about "business" – vendor, payer, provider – who is the clear best source? Is there one? are there several? And does it make sense then for VITA to try to bring all the players together to hash out a common understanding? Or should that be someone else? There may well be an external standard somewhere for "business" and if there is, who should be the party responsible for identifying that it exists and then assessing the broad reach of the term "business" across the Commonwealth? I think that is what HITSAC is trying to get at (not that I am speaking for them)..

Thanks for taking the time to engage on this Ernie! It is just what we need!

Susan

From: Tyson, Vickie (DGS)

Subject: RE: HITSAC and Proposed New Data Governance Framework

Susan,

I'd like to provide another perspective to consider regarding the proposed process for adopting / adapting external standards. The Division of Consolidated Laboratory Services (DCLS), though within DGS, routinely collaborates nationally with other public health labs through an established Community of Practice. This Community is comprised of informatics specialists and IT SME's who collaborate to establish national standards for the exchange of data between the public health lab space (PHL's), public health agencies such as VDH (PA), federal and state partner agencies (CDC), and the hospital community. It is through this Community that we are able to readily establish and adopt standards which facilitate the reporting of clinical lab data, as well as, critical information required during an "all-hazards" event.

A good example of this occurred during the H1N1 pandemic. At that time, DCLS was required to change the vocabulary code set, and data and messaging standards used for flu surveillance reporting, to accommodate the collection of additional analytical and epidemiologically important data for VDH and CDC. These changes were made within a few days of declaring a national pandemic, so that key decisions makers could act upon the data to properly manage the H1N1 outbreak. To suggest that these changes be vetted through a 30-60 review period, and then be routed for approval through VITA, the CIO, and the SoTech, is not realistic. So public health agencies need the ability to rapidly respond to "standards" changes that are driven by the need to manage emerging public health threats. I did not see anywhere in the proposed draft, where this scenario is addressed.

As for internal standards I agree that wherever possible, COV should attempt to enforce national/established standards which promote interoperability and that any new applications, architecture, or development work should incorporate these standards. So in this case, I do think it is appropriate to "vet" these through an oversight process for review and approval by partner agencies, VITA, CIO, and SoTech.

Vickie

From: McCleary, Susan (VITA)

Vickie,

You raise a great point. I am not sure how we would accommodate such an emergency exception within the framework document but I can see where we would definitely want to allow for such a possibility. Would you be comfortable with an understanding that the last item under VITA on page three, "Develops specific procedures for the implementation of this governance framework," allows us to develop procedures in special circumstances that will then be incorporated into one of the five documents that will have to be updated? Or would you rather us add a new section to the framework that specifically addresses handling in these kinds of situations?

Thanks!

Susan

From: Tyson, Vickie (DGS)

Susan,

I would prefer a separate section that specifically identifies the exemptions and the appropriate handling.

Thanks,

Vickie

From: McCleary, Susan (VITA)

Vickie,

After giving this a bit more thought – as it applies to external standards, we will be citing standards, not developing them. Granted in this case (if I am understanding it correctly) you are acting as part of the SDO but they are still external standards, right? If so, there will be links to these external standards in the Standards Repository. Given that, if an external standard changes, I think you would be well within the current framework to make changes to accommodate whatever changes are made to an external standard without having to go through a review and approval process. The periodic review is there to accommodate updates of a more routine nature and to ensure that we remain current. I don't think that precludes agencies from remaining current on their own. In other words, I think the scenario described below is covered... ??

From: Tyson, Vickie (DGS)

Susan,

I am not sure it does. In our case, we moved from a 2.3.1 unsolicited result message to a 2.5 result message and added several new code sets to accommodate the messaging of EPI and analytical data. So this is a different scenario than updating or expanding the framework for an existing message. We actually moved to a different version of the message to accommodate the additional data elements which could not be messaged in the 2.3.1 version and implemented several new code sets.

Hopefully this is the exception, but wanted to ensure we have a process for handling this requirement.

Vickie

From: Steidle, Ernie (DRS)

Vickie's message provides a perfect example. Note that DGS used a network of SME partners in developing a data exchange proposal and that network of partners is easier to assemble among colleagues who do similar work and experience similar issues.

Virginia State Police (VSP)

From: Shepherd, Elaine
To: McCleary, Susan (VITA)
Cc: Heard, Akeisha (VITA)
Subject: RE: Follow-up on NIEM meeting
Date: Tuesday, May 17, 2011 3:07:18 PM

Susan,

I am not sure as to the intent and scope of the data standards affected by the draft governance framework as I am still somewhat confused over the definition of external and internal standards. At VSP, we interface with hundreds of local and national agencies/systems which have various national standards (NCIC, NLETS, EBTS, IBR, etc.) that we must follow along with ones that we have established for communications among Virginia agencies. Would the new data governance standard require us to seek approval from VITA to get these listed as approved internal and external interfaces? When the feds update the NCIC standard, would we be required to get VITA approval before we implement?

We are being required to adopt NIEM by the federal agencies and will be slowly migrating to that in our new interfaces as we replace and implement new systems. Because of the enormous amount of work involved in changing interfaces (both by the state and local agencies), we are expecting it to take many years to move to NIEM. In addition, our new systems will have to provide for both the new and existing interfaces to allow ample time for all the agencies to transition. We work with many local agencies that have limited resources.

In the proposed data governance standard, it appears that the CIO can set deadlines for the agencies to comply with a standard. This does not seem to be reflective of the current fiscal dilemma and limited resources faced by the agencies. It would be almost impossible to justify replacing an interface that works to conform to a standard unless it is part of a new system – especially when we have so much more critical work to do.

I believe that establishment of data standards for new exchanges at the state level is something to strive for. And we would be in support of the extension of NIEM as we are already required to transition our new systems to that by the federal agencies that we deal with. I am concerned over the “governance” or enforcement side and think that it should be eliminated at this point. As you are aware, any changes even as “small” as the Vendor Standardization project, end up taking much time and resources at the agency level. I am concerned that as the standard is proposed, that it will add more layers of approvals to get a project implemented. I am not sure how this will be beneficial.

Not sure if I understood the intent correctly but wanted to share these comments just in case.

Elaine