

May 02, 2024

Micky Tripathi, Ph.D., M.P.P.
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C St SW
Washington, DC 20416

Dear Dr. Tripathi,

On behalf of Medical Information Technology, Inc. (MEDITECH), I am pleased to comment on the 2024 Standards Version Advancement Process (SVAP).

MEDITECH empowers healthcare organizations around the globe to expand their vision of what's possible with Expanse, the intelligent EHR platform. Expanse answers the demands of an overburdened workforce: personalized workflows, interoperable systems, and innovative AI applications, all working together to drive better outcomes.

Future Considerations for SVAP

We support the overall intent of SVAP to allow for continued growth and enhancement of standards. However, as the regulatory landscape evolves and new rulings give way to a new cadence in mandatory standards we feel it prudent to inquire if ONC may consider the SVAP process as obsolete? The HTI rulings are creating a regular opportunity for vendors to update their software and standards versions to comply with the national need.

If ONC does not see a pathway for which SVAP would sunset, we would like to discuss a continued concern regarding the current stance on previously approved SVAP standards as outlined in the 2022 SVAP [Fact Sheet](#). ONC states that:

“A version of an adopted standard approved for use during an SVAP cycle remains available for certification until a newer SVAP version of that standard is approved.” Later stating, “No new certifications can be made to the replaced SVAP version once the newer version goes into effect in the Certification Program.”

This causes a problem for developers as the development cycle is often longer than one year, especially since many EHR vendors have multiple product lines that need to be updated. We ask that ONC modify this position to allow for the developers to certify to the most recent standards version and continue to allow the previous SVAP standards version- essentially providing two SVAP cycles versions as a certification option. Currently, SVAP only permits a single version to be available at a time. This is restrictive to developers who have long development timelines and multiple products to develop and demonstrate conformance. By making this small change to allow more than one SVAP version, developers are able to complete work in a version and have it certified/conformance tested through SVAP.

Request for Clarifications

We also wanted to request clarification on what flexibility is available for vendors to advance certain aspects of the new standards without updating and certifying through SVAP. For example, adding new data elements or fields but not updating to the newer version. We believe that this should be acceptable so long as it does not introduce non-conformity with the currently used certified version. Seeing this confirmed in writing would be greatly appreciated.

Thank you for your time and consideration. We look forward to the finalized 2024 SVAP.