



July 17, 2021

State All Payer Claims Database Advisory Committee
c/o Elizabeth Schumacher
Designated Federal Officer
Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

RE: Standards Development Organization Support for the State All-Payer Claims Database Common Data Layout

Dear State APCD Committee Members:

IHE USA (www.iheusa.org) is a not-for-profit organization founded in 2010 with the mission to improve our nation's healthcare by promoting the adoption and use of IHE and other world-class standards, tools, and services for interoperability. IHE USA engages all levels of public and private sector participants to test, implement, and use standards-based solutions for all health information needs.

IHE USA operates as the national deployment committee of IHE International® (www.ihe.net), recognized by the International Organization for Standardization (ISO) as an International Standards Profiling Organization. IHE International works with industry experts worldwide to develop and maintain IHE technical profiles. IHE Profiles organize and leverage the integration capabilities that can be achieved by the coordinated implementation of multiple standards, such as NCPDP, HL7, LOINC, and X12, and more. IHE Technical Committees follow an open and proven process to support the maintenance of published profiles by working across different standards development organizations to ensure that the profiles reflect the ongoing updates and improvements to referenced standards.

As an organization well versed in the processes to develop practical, industry accepted standards profiles enabling real-world interoperability, IHE USA would like to express support for the Committee's efforts to develop a Common Data Layout for the State All-Payer Claims Databases. Advancing a standardized approach to data collection and submission across states that follows the best practices of implementation guide development will improve efficiency, reduce administrative costs, and improve the data quality needed to support transparency, research, benchmarking, and other key innovations.

IHE USA welcomes the chance to discuss potential opportunities for collaboration around areas of shared interest. You may contact Amit Trivedi (amit.trivedi@himss.org), HIMSS Director, Informatics, HIT Standards, and IHE Liaison at 312.405.3131 with any questions or for more information. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads 'Joyce Sensmeier'.

Joyce Sensmeier MS, RN-BC, FHIMSS, FAAN
President, IHE USA