

**Written Statement of  
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**Introduction**

Chairman Chopra and distinguished Members of the HIT Standards Committee I want to thank you for the opportunity to discuss standards based implementations in Healthcare and what can be learned from other industry implementations. Given the fact that all types of communication in our country are shifting away from face-to-face in favor of electronic media, it is vital that we consider the advantages of electronic communications in all areas of the economy. This holds particularly true in the healthcare industry where controlling costs, protecting privacy and sharing information effectively will have an impact on every United States citizen.

In the years that I have been working as a security expert at EDS, IBM, General Motors, and now with Compuware Covisint, I have become very familiar with the challenges related to developing a standard for interoperability in an industry. Covisint was created to leverage the internet utilizing a standards based communication method, such that automotive companies could take advantage of the technology without being exposed to the complexities of inter organization communication. As a result, Covisint's solution evolved as a unique information sharing hub providing a service for communities of interest to collaborate and securely exchange information.

The concerns of the automotive industry parallel those of the ONC, albeit for different reasons. In building a secure information sharing hub, the Covisint solution had to manage these electronic communications; it was our responsibility to create a system that could support the secure communication issues of a diverse community while keeping cost and implementation time to a minimum.

As Covisint expanded its business landscape and grew into other industries (healthcare, law enforcement, financial services), we saw the same sort of challenges. Healthcare systems need

to interact with each other, sending highly personal data back and forth, while maintaining compliance to regulations. In law enforcement, Covisint helped create an information-sharing pilot for the Department of Justice to use in sharing sensitive terrorist-related information between law enforcement agencies. In each case, the challenge was to balance standard implementations with implementation cost and complexity. In a nutshell, a solution that cannot be implemented or is only partially implemented may be worse than no solution at all. What we have done for these institutions is to find that balance.

## **A standard that works for all is hard to define**

When considering the approach to these electronic transactions, the temptation is to implement the most sophisticated technologies that are available to the industry. This can often be the death of an implementation. I have seen many cases of the implementation being so complex that the users of the system have either found ways around the system, thus defeating the implementation, or have made up excuses as to why “it won’t work,” and thus abandoning the system altogether.

Many organizations feel that the answer is to determine the “one way” that needs to be implemented for communication within a community. On the surface this sounds like it would be the fastest and most efficient way to implement a secure and useful interoperability platform. Unfortunately this method can be more difficult than it looks.

First a single standard method and schema need to be defined. Often time this defined standard becomes very complex in order to support all of the possible implementation scenarios that need to be supported in a complex community. This level of complexity often weighs down the ease of the implementation for participating organizations. In many implementations only the large organizations have the capability and funding to adopt a complex standard.

In addition it is many times those same large organizations that participate in the definition of the standard. If you think about it this makes sense given that participation required both expertise and time, both of which are often not available in a smaller organization.

The next hurdle is to find technology that will support the newly defined method of interoperability. When creating a new standard way of doing business we are often drawn to the most advanced sets of technologies. This is because we like the cool new stuff and because we don't want to implement a standard that will be made obsolete in a short period of time.

Unfortunately this created it own set of problems for participating organizations. Many of them are on older releases of products that do not support the newest technologies. This often times means that they will need to upgrade there systems, at significant cost, to participate in the new community.

Between the issues of cost and complexity you often get little or no implementation, or worse after implementation you get no adoption or use of the systems. So what can be done?

## **Proven Alternatives**

In my experience the creation of a Hub or broker in the community can be very helpful.

In this implementation scenario the hub act as a go-between or service that can be used to broker activity between the participants. This means more then simply data transformation services.

This would include services related to transport, security, session and data. In this type of service you allow those organizations to start where they are in the technology curve and then grow into the implementation.

This service also allows you to modify the standard as you find problems with it in a real world implementation.

Although this sounds like a simple alternative, as with all things in life, looks can be deceiving. Your choice of the hub provider is the first challenge. We have found that this provider needs to be as independent of both technology and the organizations connecting as possible.

If the hub service provider in addition to providing broker services provides a technology solution that can be used by connection organizations then they will often push that technology. If the hub service provider is one of the “players” in the community an environment of distrust can be created which discourages organizations from fully participating.

There are also some additional responsibilities that the hub can take on. These include being a policy enforcement point for the community. Which allows the community sponsor to have a place to implement rules that are in the best interest of all of players in the community. This hub should also be the interaction point to other hubs. This creates a simpler implementation of a large community network by allowing it to be broke down by region or discipline.

## **Conclusion**

Ultimately, the success of any system is all about adoption. Getting the constituents to adopt a new methodology will require selection of a cost-effective, simple and secure solution. I believe that there are simple-to-use technologies, which--when partnered with policy and oversight--can achieve adoption within the whole healthcare community. This approach can also overcome the concerns associated with enabling a complex system, which supports interoperability. I have seen this approach work successfully in many industries over the past seven years and believe it has real merit and deserves further consideration.

Chairman Chopra, and members of the Committee, I thank you for the opportunity to discuss this vital issue and welcome any questions you may have.