

May 20, 2022

Amir Bassiri, Acting Medicaid Director
Office of Health Insurance Programs
NYS Department of Health
Corning Tower (OCP-1221)
Albany, NY 12231

RE: Comments on NYS Proposed 1115 Waiver Amendment Request

As the entities that make up the Statewide Health Information Network for New York (the SHIN-NY), we are pleased to provide these comments in response to the New York State’s proposed 1115 waiver amendment request, “Strategic Health Equity Reform Payment Arrangements: Making Targeted, Evidence-Based Investments to Address the Health Disparities Exacerbated by the COVID-19 Pandemic” (SHERPA). Collectively, the six undersigned Qualified Entities (QEs) and the New York eHealth Collaborative (NYeC) comprise the SHIN-NY – a State-funded health information exchange. New York State has wisely invested in the development and support of the SHIN-NY and today it is one of the most robust networks in the nation.

In partnership with the New York State Department of Health (DOH), NYeC developed and manages the technology platform that connects New York’s QEs and enables the sharing of data statewide, ensuring that the SHIN-NY provides access to a patient’s electronic medical records wherever and whenever they need it.

Our collective vision is a dramatically transformed healthcare system where Health Information Exchange is universally used as a tool to make lives better. The SHIN-NY connects all hospitals in New York State, is used by over 100,000 healthcare and community-based professions, and enables collaboration and coordination of care to improve patient outcomes, reduce unnecessary and avoidable tests and procedures, and lower costs. Through our collective partnership and with support from the State, we have built a strong, statewide network that serves millions of New York State residents. Through the lens of this experience and our strong interest in partnering to achieve the ambitious and worthy goals set forth in this waiver, we offer the following comments and recommendations for implementation.

Leverage State’s Investments in SHIN-NY Technology Infrastructure

The State’s ambitious waiver plan aims to reduce health disparities, promote health equity and promote the delivery of social care for its Medicaid enrollees. The waiver plan envisions Health Equity Regional Organizations (HEROs) that would be charged with carrying out a vast array of activities and collaborative efforts – one of the most complex and expensive of which is building the technology infrastructure needed to accomplish the aims of the waiver. However, more than a decade ago, New York State had the foresight to envision and support the SHIN-NY, a Statewide health information exchange, and we urge the State to leverage this resource now. We recommend strong consideration for establishing QEs as the HEROs or a formal relationship between the HEROs and the SHIN-NY, which would allow the HEROs to take advantage of the State’s investments in the SHIN-NY technology infrastructure while ensuring that waiver funds are focused and directed where they can have the greatest impact – supporting the needs of the HEROs’ communities.

Governance and Policy

As stakeholders review and comment on the waiver, it has become clear that there are significant differences emerging in the field as to how the waiver could best be implemented in New York. We are also aware that

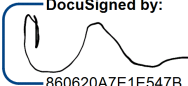
operational issues are emerging in states like California and North Carolina that have begun to implement their waiver plans. New York must be prepared for the key operational questions and issues that will arise and need to be addressed both prior to and during the waiver's implementation. We propose that the State, in partnership with the SHIN-NY, engage in a multi-stakeholder planning process at the earliest possible opportunity to begin to identify and address issues such as policy and governance. Based on the SHIN-NY's experience in standing up and implementing a network of technology platforms for health information across the State, we are uniquely positioned to assist the State in identifying and solutioning issues and navigating challenges in an implementation of such magnitude.

Data Standardization and Quality

As the State recognizes in the waiver, interoperability and data standardization will be key to the work of the HEROs in analyzing data, identifying equity priorities, building consensus around interventions, and applying lessons learned. The SHIN-NY has deep experience in data management and data governance, and has been focusing on data quality initiatives over the last year. As noted above, at a minimum, a formal relationship between the HEROs and the SHIN-NY can help the State to leverage our existing experience and expertise in data standardization to support and strengthen the work of the HEROs.

We commend the State on its efforts to envision a bold plan to achieve an equitable health care system in New York and we stand ready to partner with the State in this critical work.

Thank you for the opportunity to provide comments.

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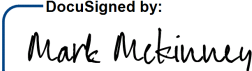
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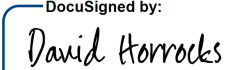
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