

From: [mgagnon](#)
To: [Malinda Southard](#)
Subject: RE: Interoperability
Date: Thursday, May 2, 2024 9:28:30 AM

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Malinda,

Sorry for the last minute recommendations but I mentioned at the last meeting and other members of the Advisory Group also agreed that just having a certified EHR is not sufficient to meeting the requirements for exchange of data to meet AB7. I would suggest we change the language in that section to the following:

2. *Compliance with the provisions of subsection X of NRS 439.589 is satisfied by either of the following:*
 - a. *Maintain an electronic health record system pursuant to NAC 439.576 subsection 2, and install and implement components or services for exchanging data; or*
 - b. *Maintain connection with a health information exchange pursuant to NAC 439.576 subsection 1.*

From: Michael Gagnon
Sent: Thursday, May 2, 2024 8:43 AM
To: Malinda Southard <msouthard@dncfp.nv.gov>
Subject: Interoperability
Importance: High

Hi Malinda,

I believe the definition of Interoperability in the proposed regulation does not meet the requirements as defined nationally. I would recommend we either take the definition used by the ONC

(https://www.healthit.gov/sites/default/files/factsheets/onc_interoperabilityfactsheet.pdf) or change our wording to the following. My main concern is that we are saying that QHIN standards are the only applicable ones for interoperability which is simply not broad enough. There are standards from HL7, ONC, IHE, etc.

AC 439.XXX “Interoperability” defined. *As used in NAC 439.572 to NAC 439.596, inclusive, “interoperability” means the ability to securely exchange electronic health information with electronic health information in other networks and technologies used to maintain, transmit and exchange health information, in compliance with applicable HIPAA regulations and in accordance with the applicable national standards for the interoperability of health data,*

including those for Qualified Health Information Networks prescribed and designated by the Office of the National Coordinator for Health Information Technology of the United States Department of Health and Human Services.

I wanted to send you this before the meeting rather than bring it up during.

Michael L. Gagnon

Executive Director

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