

# Q1 CARIN Community Meeting

January 21, 2026

- Please mute and rename yourself in the chat and include the organization you represent [e.g., Ryan Howells (Leavitt Partners)]
- Chat will be open and monitored throughout the meeting
- If you'd like to make a verbal comment in the meeting, please use the raise your hand feature in Zoom



# Anti-Trust Reminder

Please remember that this meeting may include representatives of companies that compete with one another in the marketplace. Discussions, plans, consensus arrangement, agreements, strategies, etc., may be unlawful if they relate to, and should not include, any of the following topics: current or future prices or bidding information; limits on production or product lines; allocating customers or territories; individual company marketing strategies, projections, or assessments; and establishing a practice of dealing with customers or suppliers.

A full reminder of all CARIN Alliance and Leavitt Partners Anti-trust policies and procedures are included in the Appendix; we encourage all members to review that content and let us know if you have any questions.

# Recording and Chatham House Rules

- Please note that we are recording this meeting *for note-taking purposes only*. The recording will *not* be distributed.
- We are also operating under the Chatham House Rule. Participants are free to use the information received, but neither the identity nor the affiliation of the speaker(s), nor that of any other participant, may be revealed.
  - Please avoid the disclosure of any identifiable information to those note in the meeting, including Press.
- We will remove all AI notetakers.

# AGENDA

<b>Welcome, Antitrust Reminder</b> <i>Dave Lee</i>	1:30pm—1:35pm
<b>ASTP/ONC Update and Questions</b> <i>Steve Posnack, Principal Deputy Assistant Secretary for Technology Policy, Principal Deputy National Coordinator for Health Information Technology</i>	1:35pm—2:00pm
<b>Updates from the CMS Health Tech Ecosystem and CMS Aligned Networks Initiatives</b> <i>Amy Gleason, Acting Administrator, US DOGE Service and Strategic Advisor, Centers for Medicare &amp; Medicaid Services</i>	2:00pm—2:30pm
<b>Success Stories in Patient Access</b> <ul style="list-style-type: none"> <li>• b.Well/OpenAI</li> <li>• HealthEx/Anthropic</li> </ul>	2:30pm—3:30pm
<b>Opportunities to Engage: Advancing Transparency for Consumers</b> <ul style="list-style-type: none"> <li>• Price Transparency success stories – Chris Severin, CEO, Turquoise Health <ul style="list-style-type: none"> <li>○ <a href="#">New York Price Transparency project</a></li> <li>○ <a href="#">Price Transparency Information</a></li> </ul> </li> <li>• <a href="#">CARIN IG for Blue Button</a> and Network ID work</li> <li>• <a href="#">CARIN IG for Digital Insurance Card</a></li> <li>• <a href="#">CARIN RTPBC</a></li> </ul>	3:30pm—4:25pm
<b>Next Steps and Adjourn</b>	4:25pm—4:30pm

# Updates from ASTP/ONC

*Steve Posnack*

# Updates from CMS

*Amy Gleason*

# The 12 CMS Health Tech Ecosystem workgroups

- **CMS Aligned Networks**
- **Kill the Clipboard**
- **Patient Preferences**
- **Digital Identity**
- **Health Care Providers & Health Systems**
- **Payer – Limited Data Set for Quality Measurement Reporting**
- **Conversation Artificial Intelligence**
- **Diabetes and Obesity**
- **Record Locator Service (RLS)**
- **Network Transaction Audit Logging and IAS Retrieval**
- **Encounter Notifications**
- **Steering Committee**

RED = Where CARIN members are actively participating

# Caregiver Experience: Mark Roberts

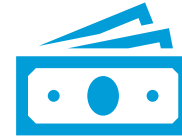
# Success Stories in Patient Access

## b.Well and HealthEx

# Price Transparency Efforts

Chris Severn, CEO, Turquoise Health

# Expanding the number of consumer use cases using open standards and federal policy



## Key Questions

- |   |  |   |   |  |
|---|--|---|---|--|
| <ul style="list-style-type: none"> <li>&gt; What providers are in-network with this plan?</li> <li>&gt; What are my estimated out-of-pocket costs?</li> <li>&gt; What is the premium?</li> <li>&gt; Are my meds covered?</li> </ul> | <ul style="list-style-type: none"> <li>&gt; Does this provider accept my insurance?</li> <li>&gt; Does this provider have available appointments?</li> <li>&gt; Is this provider nearby and accessible?</li> </ul> | <ul style="list-style-type: none"> <li>&gt; What is the out-of-pocket cost if I use insurance?</li> <li>&gt; What is the cash pay cost of the service?</li> </ul> | <ul style="list-style-type: none"> <li>&gt; What providers have I previously seen?</li> <li>&gt; What is my current insurance?</li> <li>&gt; What other health information to report (medications, allergies, conditions, etc.)?</li> </ul> | <ul style="list-style-type: none"> <li>&gt; What is my provider's digital endpoint?</li> <li>&gt; Can I retrieve post-visit summaries, images, and other information from my appointment?</li> <li>&gt; What are the results of my tests?</li> </ul> |
|---|--|---|---|--|

## Select Plan →

## Select Provider →

## Estimate Cost →

## Check-In →

## Access Data →

## APIs & Data Required

- |  |  |  |   |   |
|--|--|--|---|---|
| <ul style="list-style-type: none"> <li>&gt; Provider Directory API</li> <li>&gt; Patient Access API</li> <li>&gt; Formulary Data</li> <li>&gt; Coverage Rules</li> <li>&gt; Price Transparency MRFs</li> </ul> | <ul style="list-style-type: none"> <li>&gt; Provider Directory API</li> <li>&gt; Patient Access API</li> <li>&gt; Appointment Scheduling API (Provider)*</li> <li>&gt; Schema.org Provider Profiles on Website*</li> </ul> | <ul style="list-style-type: none"> <li>&gt; Advanced EOB</li> <li>&gt; Good Faith Estimates</li> <li>&gt; Price Transparency MRFs</li> <li>&gt; GFE Request API*</li> <li>&gt; Project Clarity Bundles</li> <li>&gt; CARIN Real-Time Pharmacy Benefit Check API</li> </ul> | <ul style="list-style-type: none"> <li>&gt; Patient Access API (Payer)</li> <li>&gt; Patient Access API (Provider)</li> <li>&gt; Identity-Proofed Digital Credentials for SSO</li> <li>&gt; Digital Insurance Card</li> </ul> | <ul style="list-style-type: none"> <li>&gt; Patient Access API</li> <li>&gt; Identity-Proofed Digital Credentials for SSO</li> <li>&gt; State of Utah / CARIN Alliance FHIR API Endpoint Directory Framework</li> </ul> |
|--|--|--|---|---|

# More than a PHR: Supporting Consumer Price Transparency Efforts

- **RTPBC**

- January HL7 Connectathon – Third party apps successfully connected (end-to-end) with Aetna’s RTPBC API and the GoodRx API acquiring patient benefit cost and discount card options to be provided to the patient – CARIN RTPBC FHIR IG 1.0 successfully proved utility
- SandwYch (third party app) successfully used the CARIN Digital Insurance Card (DIC) to acquire coverage information from AETNA/CVS Health
- AETNA/CVS Health confirmed their ability to acknowledge the DIC and use to confirm coverage of the beneficiary and also that they likely would not require any additional login by the beneficiary if the DIC is used. Still in discussion with their legal team
- In 2026 we will:
  - Finalize STU 2.0 and test new data content to be requested and returned, ie., refill too soon, copay, etc. in alignment with NCPDP prescriber RTPB data points
  - Discuss the digitization of copay assistance programs process and content
  - Keep progressing the use of the digital insurance card to confirm patient coverage

- **Transparency in Coverage Proposed Rule (CMS 9882-P)**

- Proposed rule builds on 2020 final rule (CMS 9915-F)
- Includes requirements on machine-readable file standardization, focusing on making data more usable, more accessible, and standardizing communications to end-users and consumers.
- TIC implementation has not been a focus for the CARIN Alliance—should it be?

# 2025 Year In Review; 2026 Priorities

# 2025 Year in Review: A Sample Set of Accomplishments

Workstream	Highlights
CARIN Consumer App Forum	<ul style="list-style-type: none"> <li>Engagement with multiple stakeholders, including ASTP/ONC on a number of connection and consumer convenience issues, including: API Endpoint Discovery, Onboarding and Registration, Standardized API and Service function, and Consumer ease</li> <li>Held several calls with ASTP/ONC on issues related to consumer access, including IAS in TEFCA</li> </ul>
CARIN Policy WG	<ul style="list-style-type: none"> <li>Responded to numerous regulatory actions, the CMS Aligned Network RFIs and Interoperability Framework development</li> <li>Met with staff from Committees of Jurisdiction in both Chambers</li> </ul>
CARIN Trust WG	<ul style="list-style-type: none"> <li>Engaged with DirectTrust/EHNAC CARIN Code of Conduct Certification Program</li> <li>Worked with CMS and ASTP/ONC on broader adoption of the Code in government programs</li> <li>Engaged other certifiers, including DiME and HITRUST on use of the Code of Conduct</li> <li>Engaged with ASTP/ONC and OCR on IAS “wrong record” issues within TEFCA</li> </ul>
CARIN RTPBC WG	<ul style="list-style-type: none"> <li>Expanded membership (third party apps and data networks)</li> <li>Advanced implementation of STU 1.0 RTPBC IG by successfully participated in the September Connectathon, where patient facing apps connected with Aetna’s RTPBC API and hosting bi-weekly work group meetings</li> <li>Flexpa tested the use of the digital insurance card to obtain coverage details from Aetna</li> <li>Updated guidance in the STU 2.0 IG based on ongoing consensus feedback of CARIN members</li> <li>Progressing STU 2.0 IG toward balloting and publication, aligning with NCPDP’s v13 <ul style="list-style-type: none"> <li>Collaborated closely with third-party app developers, discount card organizations, and PBMs to refine data elements, workflows, and guidance to strengthen the next version of the guide</li> <li>Expected publication by September 2026</li> </ul> </li> </ul>
Identity & Authentication WG	<ul style="list-style-type: none"> <li>Commented on the draft RCE IAS Exchange Purpose SOP</li> <li>Identified an inventory of technical components needed for FHIR-based IAS to work in the U.S.</li> <li>Evaluated the designs of OpenID Federation and UDAP to confirm different infrastructures will not be needed to support them</li> <li>Facilitated pilot opportunities for IAS on TEFCA using SMART on FHIR and IAS with IAL2 Digital Identity on Carequality</li> </ul>
CARIN Digital Insurance Card/SHC-SHL	<ul style="list-style-type: none"> <li>STU 2.0.0 Ballot (<i>Anticipated</i> May 2026).</li> <li>Added enhanced narrative to illustrate real-world use cases (e.g. a digital insurance card can easily be created by extending the Coverage profile of the Patient Access API).</li> <li>Updated support to US Core 6.1.0 and 7.0.0</li> </ul>

# Get Involved: Conferences and Workgroups

# CARIN ViVE and HIMSS Events

## Annual HIMSS Collaborator Event

- CARIN Open House
  - **When:** March 10, 2026 from 6:30 – 7:30pm local time
  - **Where:** Venetian Level 4, Zeno 4608
  - No registration required
- Speaking slots at the Pre-Conference

CARIN will also be at ViVE and Health IT Connect. We hope to see many of you in-person soon!

# Get Involved!!!

If you would like to get involved in any of this work or would like to get added to our various distribution lists, please email us.

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# Scope of Antitrust and Related Legal Structures

- **Antitrust laws are Federal.**
  - Address anticompetitive behavior – whether successful or not
  - Covers mergers and acquisitions
  - Relevant federal oversight mechanisms:
    - Department of Justice
    - Federal Trade Commission
    - Interagency cooperation
    - Merger and acquisition oversight
- **Similar state laws apply.**
  - Antitrust actions can originate at the state level.
- **Antitrust laws can be enforced by government or private causes of action.**
- **Often any antitrust action includes federal enforcement, state enforcement and private actions.**

# Overall Commitment

**Leavitt Partners, the Alliance, and individual Alliance members are committed to full compliance with all applicable antitrust and related laws and obligations.**

Leavitt Partners and Alliance members will avoid conduct and discussions that are contrary to antitrust obligations and good practices.

Leavitt Partners and Alliance members will promptly raise either with the Alliance or internally within the entity (including with counsel for a member), any antitrust concerns.

- These issues will be promptly addressed and resolved.
- Remember, Leavitt Partners does not provide legal advice.

# Ongoing and Demonstrated Compliance

**The Alliance, its members and LP are committed to ensuring compliance with all applicable antitrust laws and requirements.**

- **Antitrust compliance discussion at Alliance formation**
- **Annual detailed antitrust reminder**
- **Periodic reminders during the year**
  - Reminders at start of conference calls
  - Tents at meetings
- **Reminder to raise questions and seek counsel**
  - Remember, Leavitt Partners does not provide legal advice.

# Compliance Requirements – Price and Costs

**The Alliance and its members will avoid formal or informal discussions or actions (including “hallway” conversations) relating to any aspect of pricing or confidential cost information.**

- Pricing and cost information includes (but is not limited to):
  - Pricing plans (including future pricing plans or ideas)
  - Confidential current or past pricing information
  - Non-public bids or offers or future plans for bids or offers
  - Suggested pricing
  - Ways to modify or increase price
  - Confidential cost information

**The Alliance and its members will avoid formal or informal discussions or actions (including “hallway” conversations) relating to any aspect of market allocations.**

Market allocations includes (but is not limited to):

- Direct or indirect market allocations
- Customer allocations
- Geographic allocations
- Product segment allocations
- Discussions of entering or exiting markets
- Non-public merger, acquisition or divestiture plans

# Compliance Requirements – Group Boycotts and Anti-Competitive Agreements

**The Alliance and its members will avoid formal or informal discussions or actions (including “hallway” conversations) relating to any aspect of a potential group boycott.**

Potential group boycott includes (but is not limited to):

- Boycotting a customer or a supplier
- Boycotting selected markets
- Creating anti-competitive market barriers
- Creating anti-competitive rules, standards, or certifications
- Discriminating against some competitors for anti-competitive reasons
- Creating, enforcing or participating in anti-competitive agreements

# Compliance Requirements – Standard Setting Activities

**If the Alliance and its members engage in formal or informal standard setting activities, the Alliance will abide by all antitrust requirements in so doing.**

- Standards can be:
  - Technical, process or policy centric
  - Formal or informal
- Standards cannot discriminate or be anticompetitive.
- Open, inclusive processes needed.
- Intellectual property questions may need to be addressed.
- Standard setting activities can be performed legally.

# Compliance Requirements – Confidential Business Information

**Members and the Alliance shall not solicit, discuss, collect or use confidential company business information.**

This protected information includes (but is not limited to) non-public:

- Product development plans
- Product specific regulatory strategies or timelines
- Production plans or limits
- Merger or acquisition plans
- Non-public financial performance or projections
- Marketing or sales plans

Note: Certain limited types of data collection (including de-identified data) may be permissible.

## **Key protections do exist for certain activities.**

As a reminder, the Noerr-Pennington Doctrine protects certain advocacy work directed towards Congress and government agencies.

- This is an important protection but there are important limitations.
  - Cannot be a “sham”
  - Does not protect non-advocacy activities.

# Antitrust Compliance Processes

## Keys for the Antitrust Compliance Process

- **Understand your obligations.**
  - Federal, state, and private obligations and enforcement
- **Avoid formal or informal risky discussions or conduct.**
- **Immediately raise any issues or concerns.**
- **Consult with and rely upon legal counsel for your organization.**
  - Remember, Leavitt Partners does not provide legal advice.
  - If activities or communications of the coalition give rise to concerns, you are encouraged to contact Leavitt Partners.

# Conflicts of Interest

## Reminder of Potential Conflicts

Leavitt Partners works with a number of different companies in health care, including some who may be affected by the work of this alliance.

Leavitt Partners will disclose potential conflicts of interest as they arise.