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January 12, 2023

Mariann Yeager  
Chief Executive Officer  
The Sequoia Project  
8300 Boone Blvd.  
Suite 500  
Vienna, Virginia 22182

Dear Ms. Yeager,

The American Academy of Neurology (AAN) is the world's largest neurology specialty society representing more than 38,000 neurologists and clinical neuroscience professionals. The AAN is dedicated to promoting the highest quality patient-centered neurologic care. A neurologist is a physician with specialized training in diagnosing, treating, and managing disorders of the brain and nervous system. These disorders affect one in six people and include conditions such as multiple sclerosis (MS), Alzheimer's disease, Parkinson's disease, stroke, migraine, epilepsy, traumatic brain injury, ALS, and spinal muscular atrophy.

The AAN has concerns with the [draft QHIN, Participant, and Subparticipant Additional Security Requirements SOP](#) that would add a requirement that Workforce members and individuals who are authorized users be authenticated at the National Institute of Standards and Technology (NIST) Authenticator Assurance Level (AAL) 2<sup>1</sup> level in order to access systems with Protected Health Information (PHI). While the Academy certainly places a premium on the importance of protecting the information of our members' patients, the academy believes that this requirement would add undue obstacles to already overburdened health care professionals. Not only would this requirement disrupt the current practice patterns by requiring additional steps to access shared workstations, but many practice settings would have to revise or replace their existing systems in order to comply with this requirement.

The AAN is grateful for the opportunity to comment on this proposed change and is eager to engage with the Office of the National Coordinator and the Recognized Coordinating Entity as these changes are considered and hopefully revised. Please contact Max Linder, the AAN's Government Relations Manager at [mlinder@aan.com](mailto:mlinder@aan.com) or Matt Kerschner, the AAN's Director, Regulatory Affairs at [mkerschner@aan.com](mailto:mkerschner@aan.com), with any questions or requests for additional information.

Sincerely,

Orly Avitzur, MD, MBA, FAAN  
President, American Academy of Neurology

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<sup>1</sup> See NIST SP800-63B for AAL2 types: <https://pages.nist.gov/800-63-3/sp800-63b.html#aal2types>