



Response to

CMS & ASTP/ONC RFI

Redefining US Healthcare through
Secure Data Ecosystems

June 16 , 2025



EXECUTIVE SUMMARY



In response to the Centers for Medicare & Medicaid Services (CMS) Request for Information (RFI), BurstIQ recognizes the urgent need to address fragmented data systems that hinder innovation and trust in healthcare. While the RFI outlines immediate challenges, we believe this is an opportunity to envision a broader solution that not only resolves these issues but also empowers CMS to lead in creating a seamless, patient-centered digital health ecosystem.

BurstIQ's LifeGraph® platform transforms data management by integrating disparate sources into a unified AI-ready ecosystem. By embedding governance, privacy, and intelligence directly into data and leveraging blockchain security and knowledge graphs, LifeGraph reduces technological debt and risk while enhancing analytical potential. This enables CMS to build a seamless, patient-centered digital health infrastructure where data flows securely and intelligently, empowering Medicare beneficiaries and driving next-generation solutions. Together, we can create a future where secure, connected data unlocks innovation and transforms lives.

SOLUTION V2MOM

V2MOM provides a simple framework for defining what we are going to do, how we are going to do it, and how we will elevate our success.



SOLUTION V2MOM **VISION** 

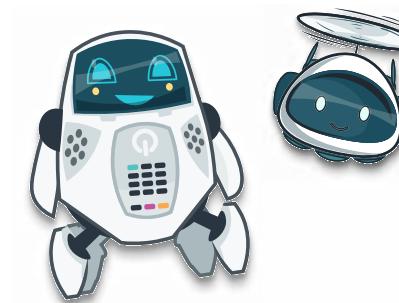
CMS is leading a transformative journey toward a national connected ecosystem where data flows seamlessly, empowering patients and providers alike. By harnessing innovative technologies and fostering collaboration, CMS aims to create a patient-centered digital health landscape that enhances access, improves outcomes, and inspires confidence in care. This future isn't just about overcoming current challenges; it's about unlocking the potential of healthcare to elevate lives, ensuring that every individual has the tools and support needed to thrive in their health journey. Together, we can build a healthier, more equitable future for all.

TIME

TRANSFORMING LIVES: CMS'S BOLD STEPS TOWARD A FUTURE OF INTEGRATED, ACCESSIBLE HEALTHCARE



THE FUTURE INTEGRATED HEALTH ECOSYSTEM



COMPANION AI

AI-enabled health coaches improve patient health literacy, engagement, and compliance.



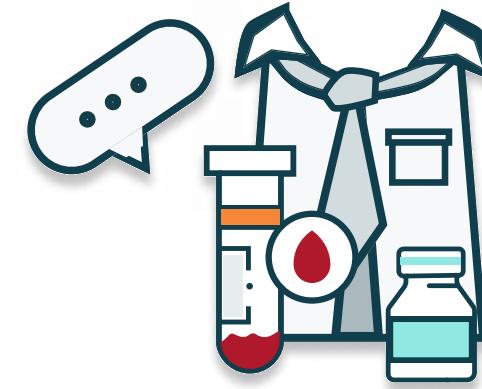
LIFEGRAPH PROFILE

Patients can securely collect, control, and consent clinical, behavioral, and biometric data.



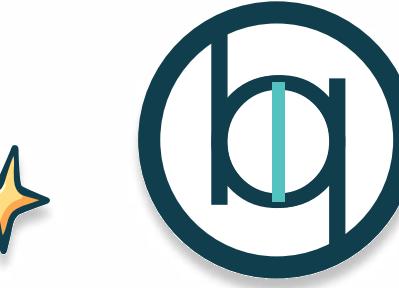
PATHWAYS

Personalized care plans and engagement pathways help patients stay on track and optimize clinical outcomes.



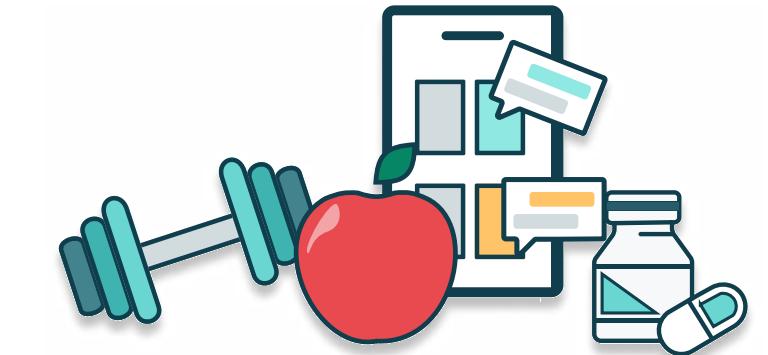
PROVIDER

Deeper, more contextualized, and timely insights improve provider-facing decision support systems and clinical outcomes.



TRANSACTIONS & INCENTIVES

Increase health engagement through tokenomics and gamification.



SERVICES MARKETPLACE

Patients can access wellness programs and other support services that help them achieve their health goals.

BURSTIQ: SETTING A VISION BEYOND THE RFI

The RFI focuses on applying innovative solutions to address immediate challenges in healthcare data sharing. In addition to addressing these immediate challenges, BurstIQ's response offers future-proof systems and solutions that rethink the foundation of healthcare delivery, affordability, and innovation in the U.S. through a secure, AI-powered data ecosystem that transforms how healthcare operates.

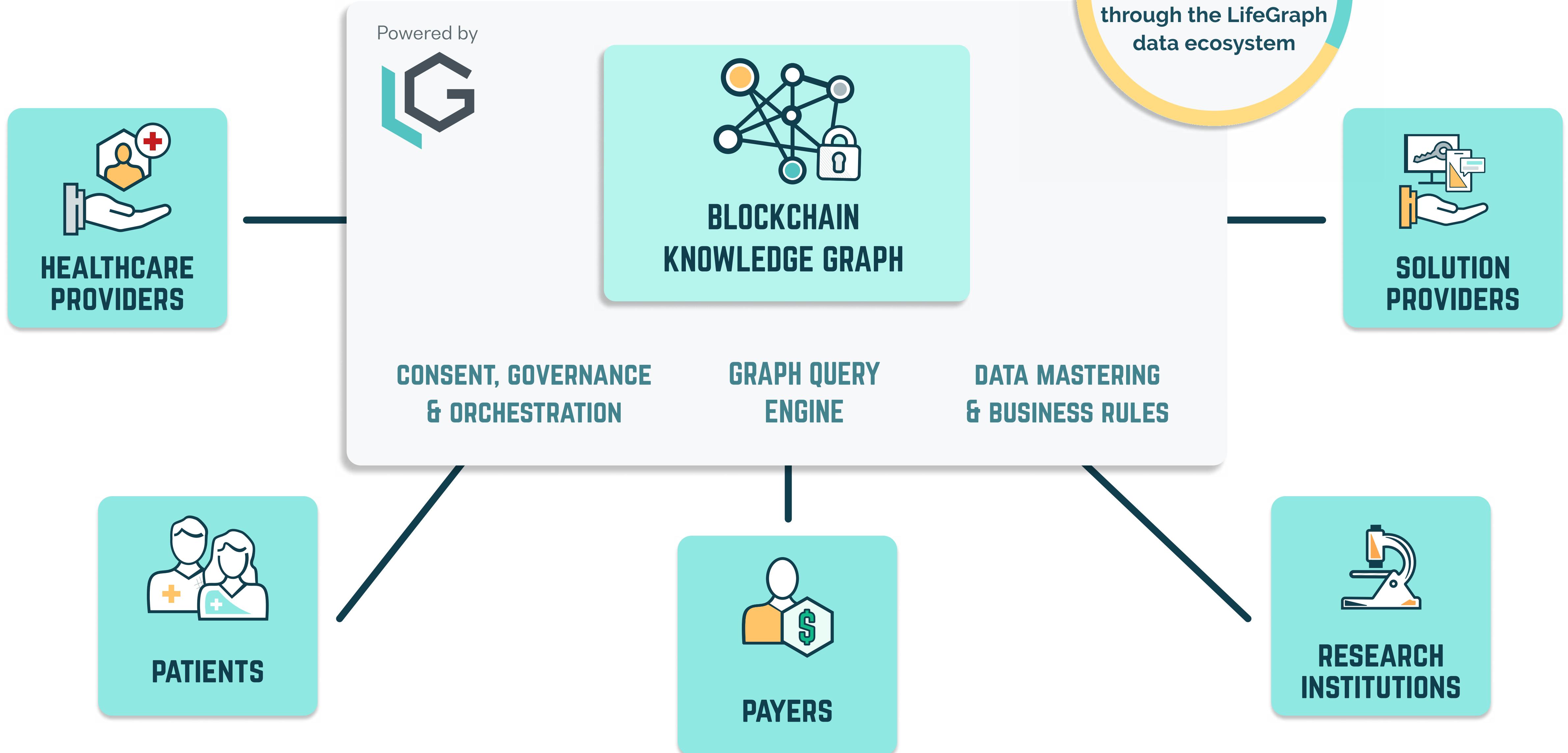
Our Vision: A Smarter, More Connected Healthcare Future

- **Eliminating Technical Debt:** BurstIQ amplifies existing systems so you don't have to start from scratch. By leveraging blockchain-backed infrastructure and smart data principles, we reduce inefficiencies and outdated systems that hinder progress.
- **Solving Data's Biggest Challenges:** Our approach ensures data is secure, interoperable, and actionable—empowering patients, providers, and payers alike.
- **Building a Personalized, AI-Powered Future:** We enable real-time, patient-centered care by integrating AI and advanced analytics into a trusted data ecosystem.

How We Go Beyond

- **Not Just Band-Aids:** Instead of patching existing systems, we advocate for a reimagined healthcare infrastructure that prioritizes interoperability, trust, and innovation.
- **Empowering Stakeholders:** Our solutions give patients control over their data, providers the tools to deliver personalized care, and payers the insights to optimize costs.
- **Driving Long-Term Impact:** By aligning with initiatives like TEFCA and leveraging open standards (e.g., FHIR), we create a scalable, future-proof foundation for healthcare transformation.

SOLUTION ARCHITECTURE



SOLUTION V2MOM **VALUES**



Empowerment Through Seamless Access

CMS envisions a healthcare ecosystem where Medicare beneficiaries and their families have secure, seamless access to their health data and digital tools. This empowers individuals to make informed decisions, manage chronic conditions, and take control of their health and well-being.



Interoperability and Innovation

A commitment to breaking down data silos and fostering interoperability through open, standards-based technologies is essential. By driving the adoption of innovative digital health solutions, CMS aims to create a connected infrastructure that supports value-based, patient-centered care.



Reducing Burden, Enhancing Value

CMS prioritizes reducing administrative burdens for providers and payers while accelerating progress toward a healthcare system that delivers real-world value. This includes streamlining data exchange and ensuring that technology serves as a catalyst for better care, not a barrier.

TRANSFORMATION JOURNEY

1

Transform disconnected and spaghetti networks into AI-ready ecosystems with data fabrics and knowledge graphs. Enforce privacy, quality, and governance on live data, so AI systems have a trustworthy source of truth.

CONQUER DATA CHAOS

2

Empower public and private sector AI providers to build, test, and deploy next-gen healthcare solutions while keeping intellectual property and patient data private. Gain deeper operational and clinical insights using unified, trusted, person 360 knowledge graphs.

DEPLOY AI SECURELY

3

Train and control an agentic workforce to scale the national healthcare infrastructure. Provide every patient with a personalized healthcare navigator to guide them to the right care, in the right place, at the right time.

MANAGE AGENTIC POPULATIONS

SOLUTION V2MOM

OBSTACLES

CHALLENGE

<p>Access and Interoperability Challenges: Difficulty in accessing comprehensive patient data and issues with API integration.</p>	<p>Comprehensive Data Access: LifeGraph® enables secure, real-time access to all patient data types, including unstructured data, ensuring a holistic view of health information.</p>
<p>Information Blocking: Non-responsiveness from vendors and barriers to data retrieval.</p>	<p>Transparent Information Sharing: Blockchain technology ensures accountability and transparency, effectively combating information blocking and enhancing trust in data exchange.</p>
<p>Limitations of Current Standards: Inability to exchange all necessary data elements, including unstructured data.</p>	<p>Enhanced Interoperability Standards: Supports FHIR-based integration and promotes the adoption of standardized APIs, facilitating seamless data exchange across diverse systems.</p>
<p>Digital Identity and Security Concerns: Challenges in implementing secure digital identity credentials and protocols.</p>	<p>Robust Digital Identity Management: Implements NIST-compliant identity verification solutions that enhance security while ensuring user-friendly access to health data.</p>
<p>Operational Viability: Ensuring sustainable operational costs and sufficient supply and demand for data sharing networks.</p>	<p>Sustainable Network Models: LifeGraph fosters collaborative networks that lower operational costs and incentivize participation, ensuring a thriving ecosystem for data sharing.</p>

SOLUTION V2MOM

MEASURES

1

Enhanced Data Access & Interoperability

- Increase % of patient data accessible through secure APIs for real-time data availability across systems.
- Reduce data silos by enabling participating organizations to share and access unified patient records across networks.

2

Improved Data Quality & Trust

- Ensure 99% of shared data meets predefined quality standards (e.g., accuracy, completeness, and timeliness) as verified through automated audits.
- Increase provider compliance with high-quality data submission requirements year-over-year through targeted incentives and education programs.

3

Operational Efficiency & Cost Reduction

- Reduce administrative burden by automating manual data exchange processes, saving an average of 15 hours per week per provider.
- Achieve a reduction in operational costs within the first year of adopting streamlined data management workflows.

4

Robust Security & Compliance

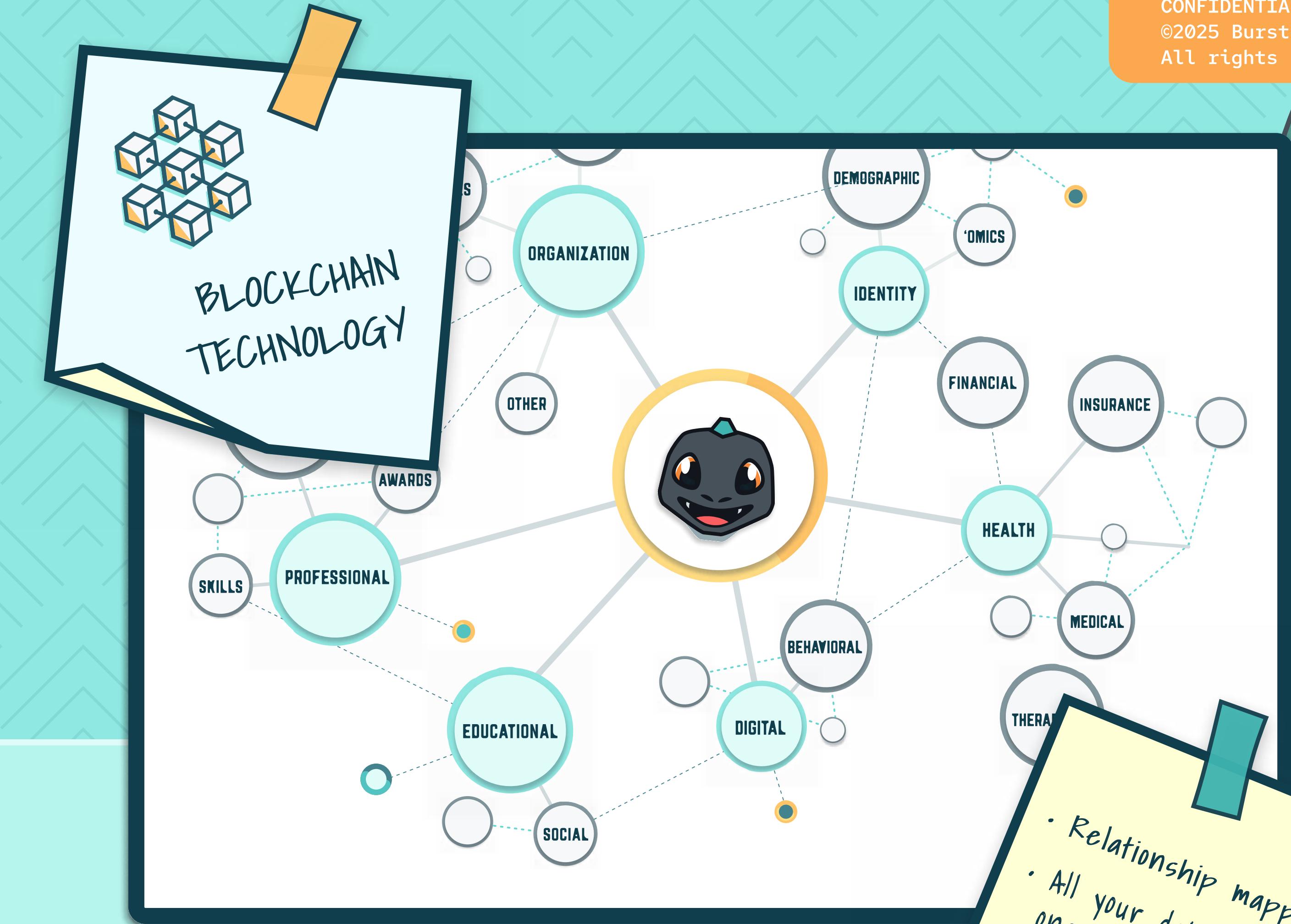
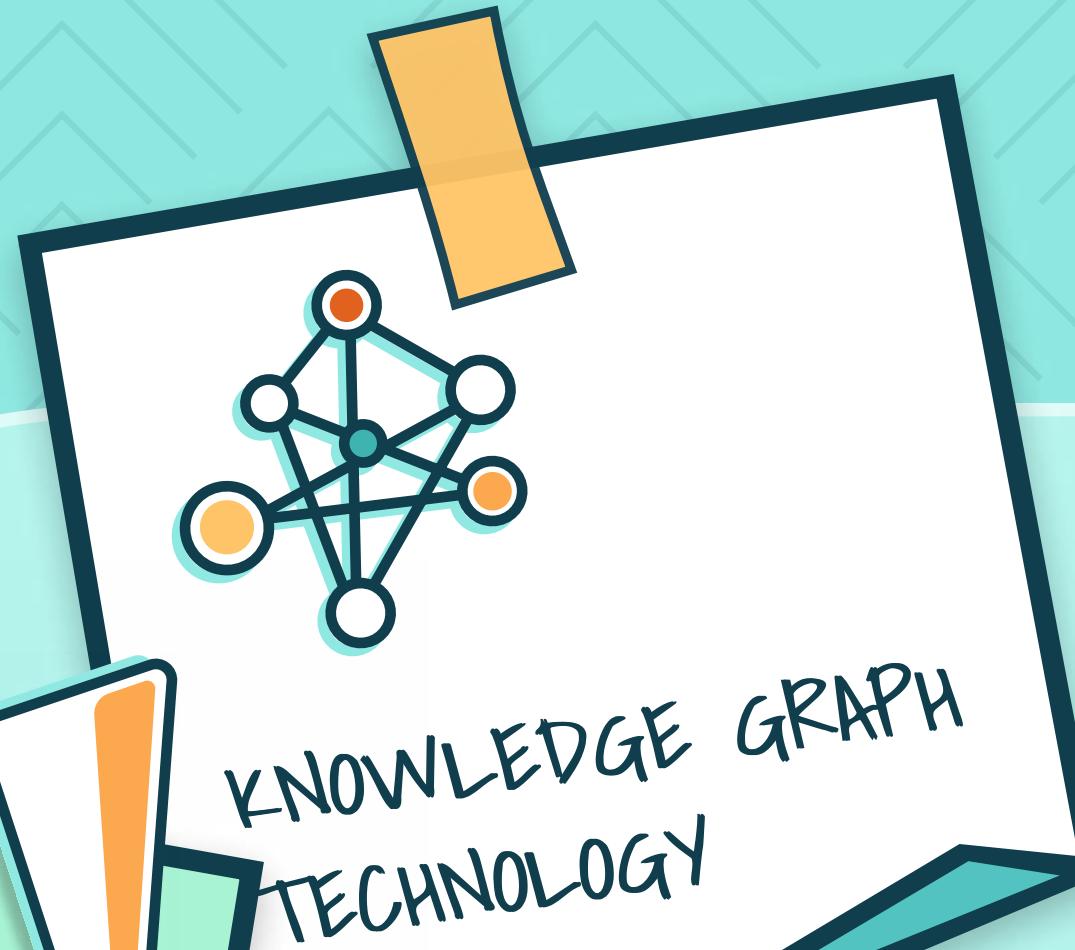
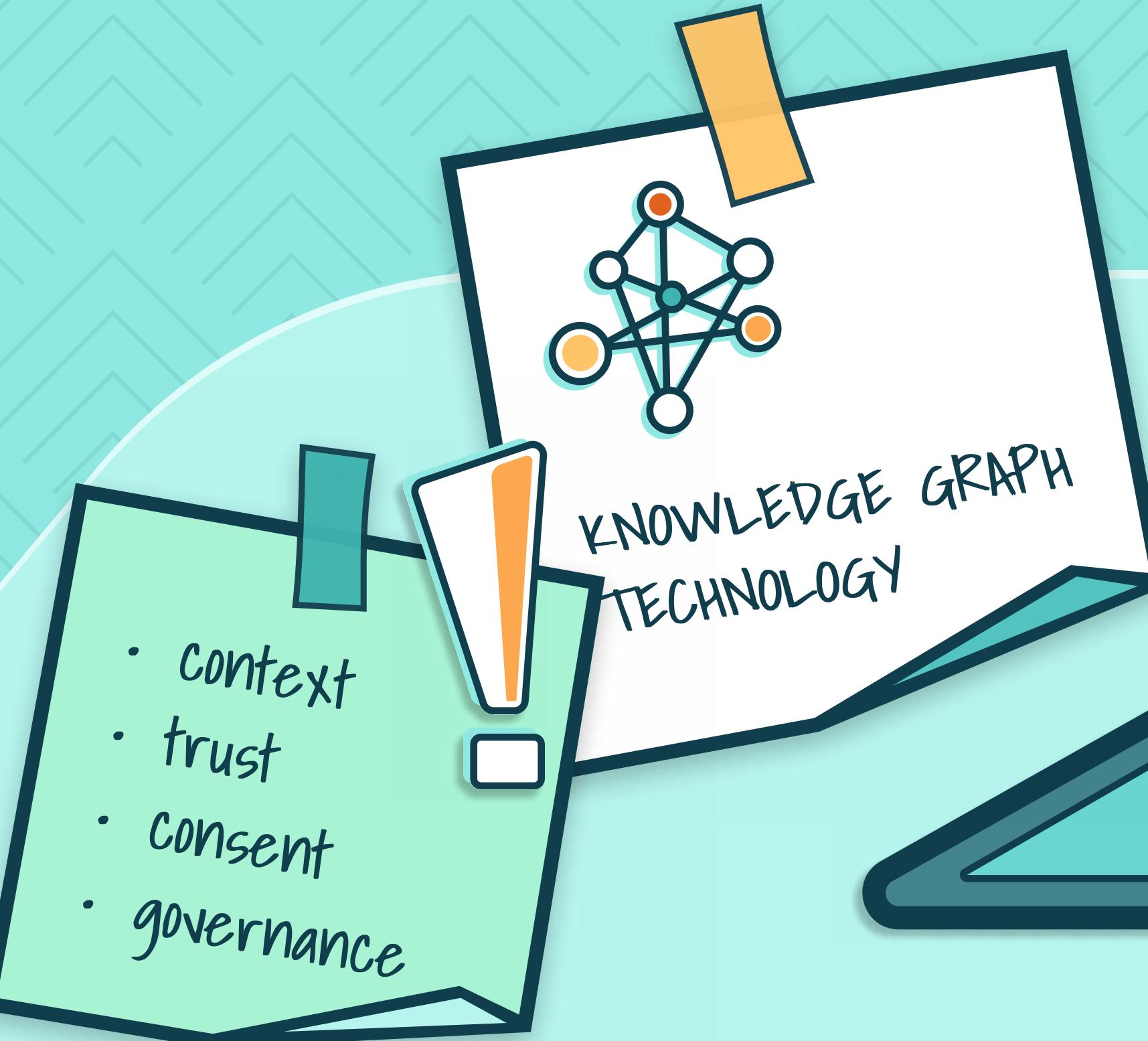
- Maintain compliance with HIPAA, GDPR, and other relevant regulations through proactive monitoring and blockchain-backed audit trails.
- Implement granular consent management tools, ensuring 95% of patients can set and manage their data-sharing preferences within 24 hours of enrollment.

5

User-Centric Experience & Engagement

- Increase patient engagement within 12 months through personalized digital tools that provide real-time access to health data and cost transparency.
- Improve stakeholder satisfaction scores (patients, providers, and payers) year-over-year by fostering trust, transparency, and seamless user experiences.

LIFEGRAPH PLATFORM CAPABILITIES



A yellow callout box contains a bulleted list of features:

- Relationship mapping
- All your data on one single platform
- Multiple ways to view data

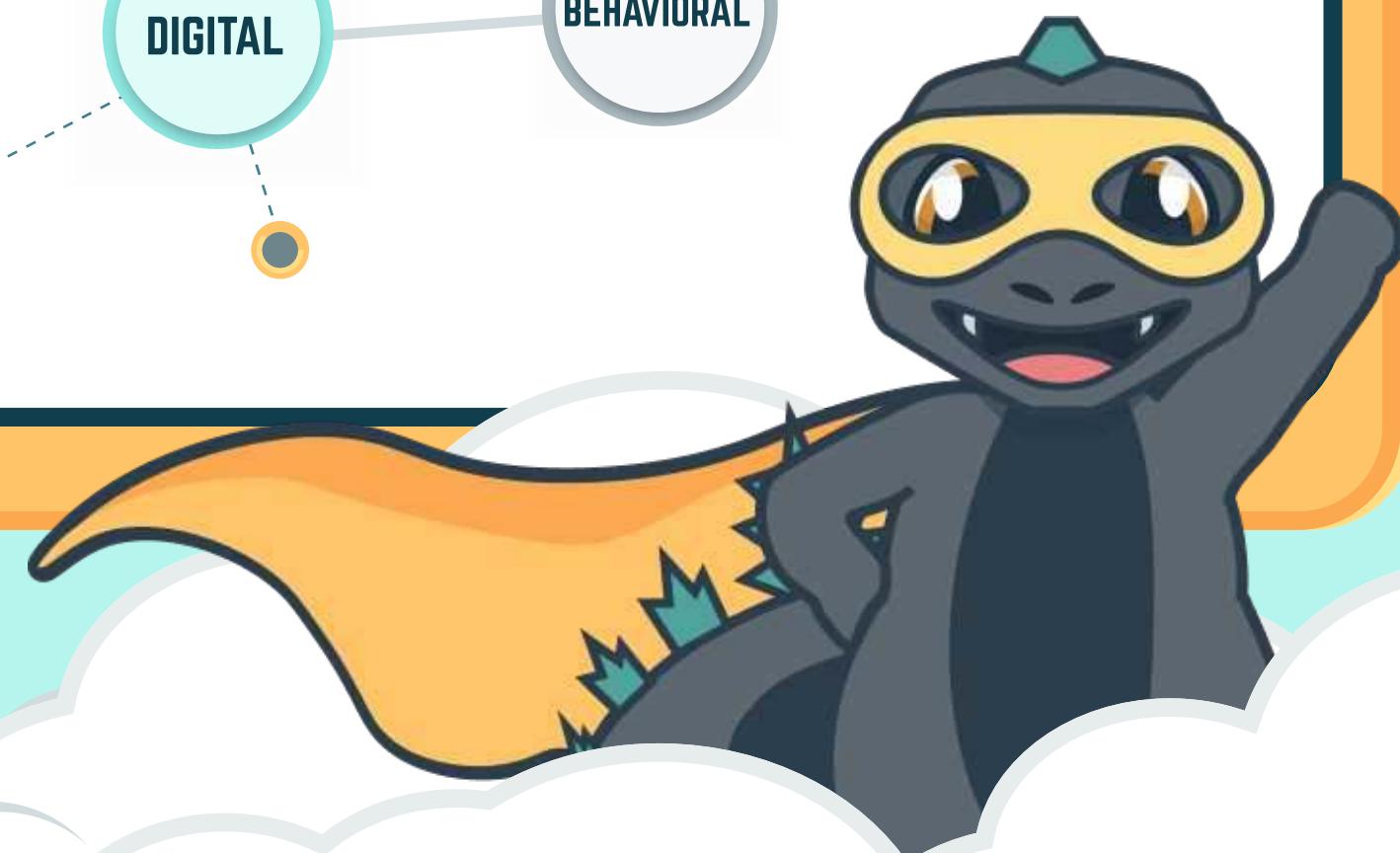
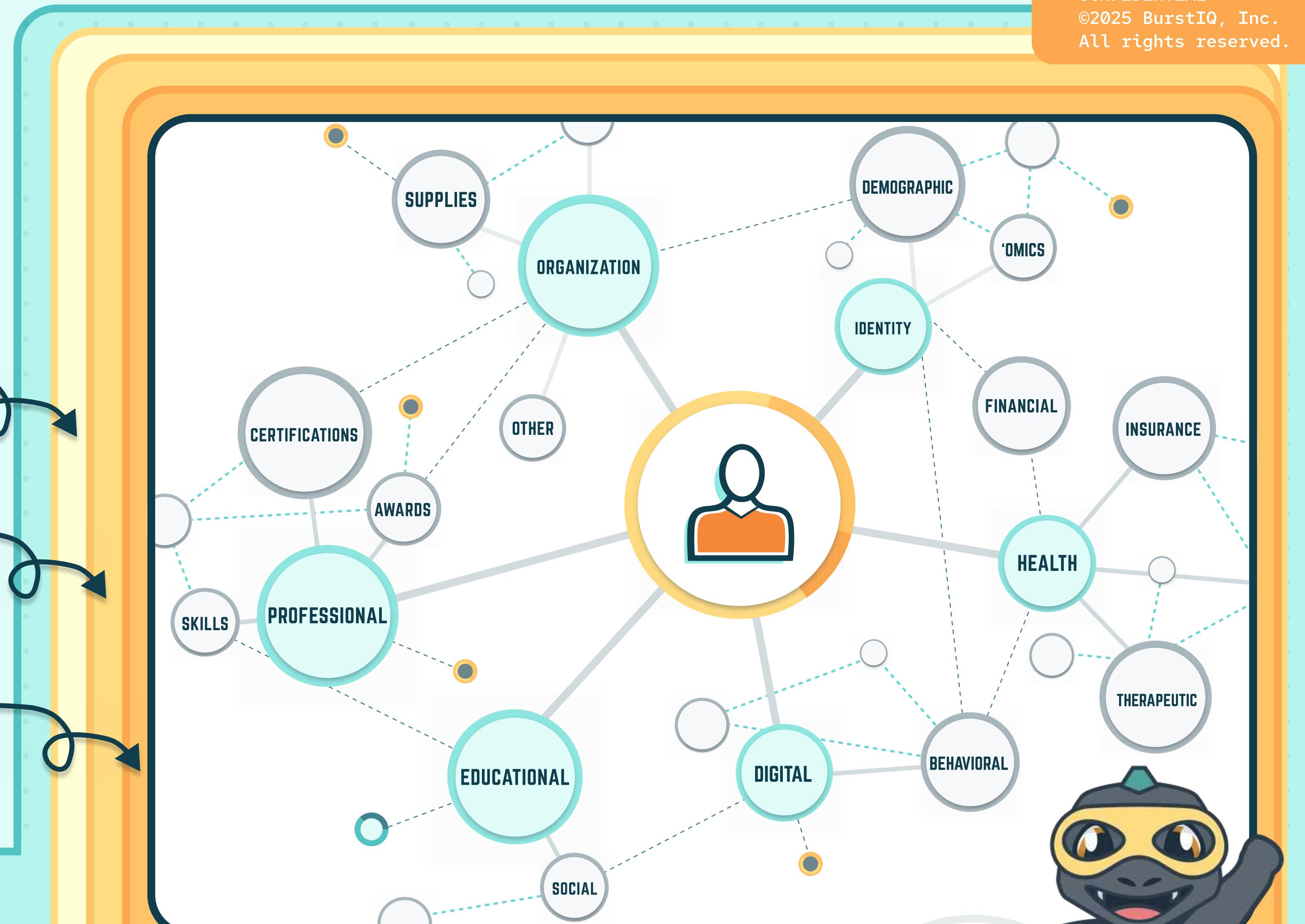
LIFE•GRAPH

LIFEGRAPH TURNS DATA INTO SMART DATA
FOR FUTURE-NOW SOLUTIONS



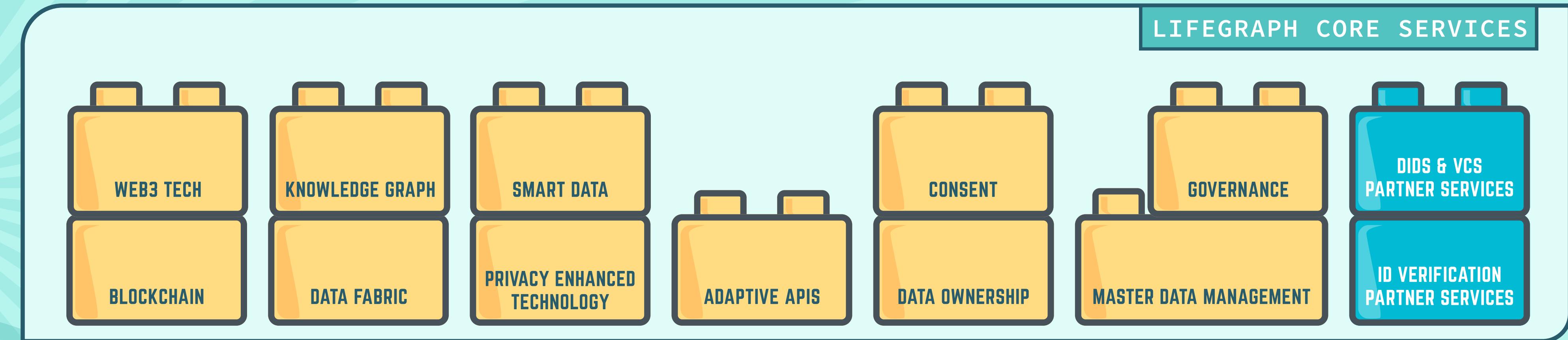
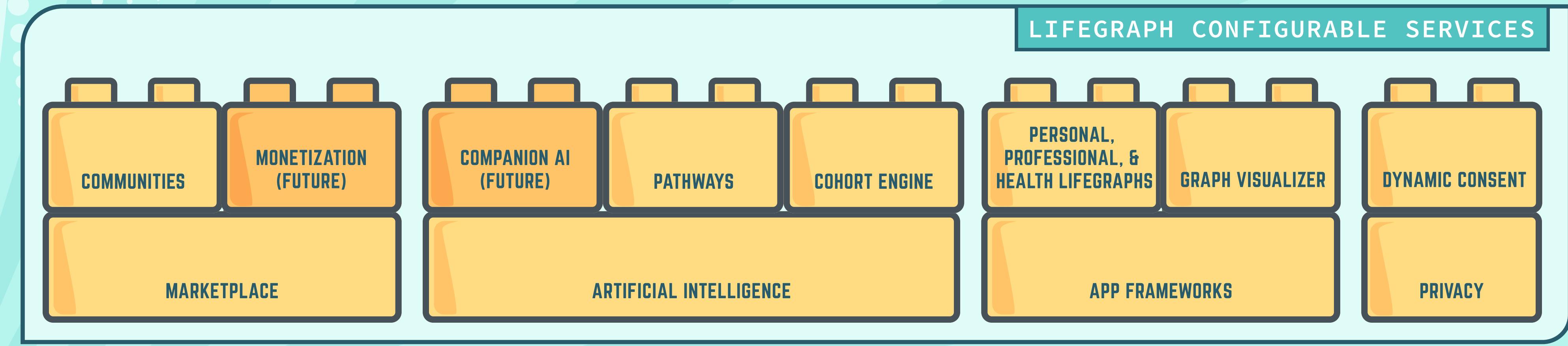
BUILT INTO THE FOUNDATION:

- OWNERSHIP
- GOVERNANCE
- AUDITABILITY
- PRIVACY
- CONSENT
- SECURITY
- MONETIZATION
- VERIFICATION



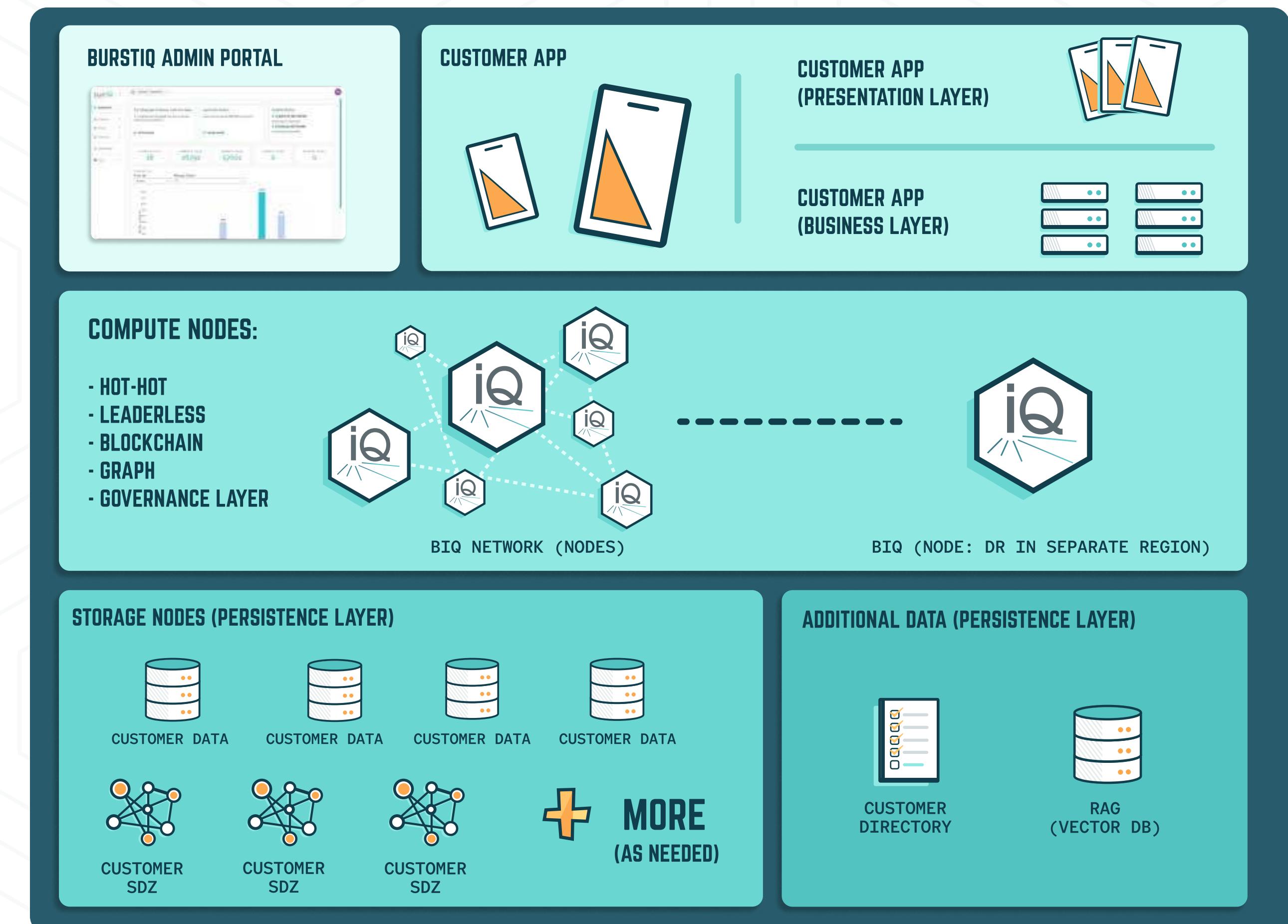
LIFEGRAPH IS YOUR FORCE MULTIPLIER

ALL OF THESE SUPERPOWERS IN A SINGLE PLATFORM



LIFEGRAPH ARCHITECTURE

- **Nodal Operational Architecture:** Supports both horizontal and vertical scaling for optimal performance.
- **Secure Data Zones:** Ability to create both physical and logical secure data zones for enhanced security.
- **AI Integration:** Supports AI integration and management of Agentic AI capabilities.
- **High Availability:** Operational implementations ensure 99.9% availability for reliability.
- **Advanced Data Pipelines:** Facilitates easy integration and supports data quality.
- **User-Friendly REST Interfaces:** Offers easy-to-use REST interfaces for fast integration.
- **Common Canonical Data Models:** Promotes unified person engagement across disparate applications.
- **Regulatory Compliance:** 7 years of operating a SOC 2 Type II, HIPAA, GDPR compliant platform.



A BEACON IN THE DATA STORM

HOW OUR CUSTOMERS USE THEIR SUPERPOWERS

Transform data and ignite its power to shape your tomorrow – from a single platform

Command Data Governance

COLORADO DEPARTMENT OF
HEALTHCARE POLICY & FINANCE

The ESI Platform from EY and BurstIQ streamlines Colorado's Medicaid Enterprise Solutions, replacing tangled 'spaghetti networks' with a **unified data exchange network** that enforces proper **data quality and governance** across the agency.

Create Trustworthy Data

LITEHOUSE HEALTH

LifeGraph applies context, trust, and verification to data, enabling ready-to-work professional profiles that health professionals **own** and employers can **trust**. It's empowering the company to **solve age-old health staffing issues**.

Personalize Human Engagements

TEXAS A&M UNIVERSITY

Texas A&M utilizes LifeGraph for **scalable collaborative genomics research**, linking clinical and non-clinical data to **empower patients** in clinical research decisions, **support data stewards**, and **enable researchers** to leverage real-world data, transforming clinicogenomics research.

Ignite AI Mastery & Innovation

MARYVILLE UNIVERSITY

LifeGraph **breaks down data silos**, creates a student-centric data flow, and delivers a trustworthy data **foundation for AI-differentiating innovations**. LifeGraphs are powering AI companions that support students' personalized lifelong learning goals.



Challenge: The Colorado Department of Health Care Policy and Financing (HCPF) faced fragmented and inaccessible data systems, poor data quality, and challenges in fraud detection.

Solution: LifeGraph® is being deployed to create a secure, unified data ecosystem, enabling seamless collaboration between module vendors, the agency, and other state agencies.

Results:

- 30% reduction in integration time for new modules seeded from HCPF's LifeGraph ecosystem
- 250+ endpoints connected to the ecosystem for secure data exchange, governance, auditability, and "in-flight" data standardization & mastering
- 3-5% records duplication, unlocking \$200M in potential savings*

What's Next: Medicaid agencies such as HCPF are looking to bring analytics closer to real-time and leverage AI to improve patient experiences, drive efficiency, reduce costs, and root out fraud, waste, and abuse. When scaled to the national level, these secure, interoperable ecosystems can potentially save hundreds of billions in healthcare costs.

*Results from a different state Medicaid agency with similar data and vendor modules.