American Hospital Association®

February 6, 2015

Karen DeSalvo, M.D., MPH
Acting Assistant Secretary for Health and
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
200 Independence Ave., S.W.
Washington, DC 20201

RE: Federal Health Information Technology Strategic Plan for 2015-2020

Dear Dr. DeSalvo:

On behalf of our nearly 5,000 member hospitals, health systems and other health care organizations, and 43,000 individual members, the American Hospital Association (AHA) is pleased to provide comment on the draft Federal Health Information Technology (IT) Strategic Plan for 2015-2020 that was released in December. America's hospitals remain strongly committed to the use of health IT to improve care for individuals and the health of populations.

The AHA thanks you for this third iteration of the federal health IT strategic plan, which was last updated 2011. The draft strategic plan identified five goals for the health system at large:

1. Expand adoption of health IT.
2. Advance secure and interoperable health information.
3. Strengthen health care delivery.
4. Advance the health and well-being of individuals and communities.
5. Advance research, scientific knowledge and innovation.

As outlined in the Health Information Technology for Economic and Clinical Health (HITECH) Act, included in the American Recovery and Reinvestment Act of 2009, a key role of the Office of the National Coordinator for Health IT (ONC) is to "coordinate health information technology policy and programs of [the Department of Health and Human Services] with those of other relevant executive branch agencies with a goal of avoiding duplication of efforts and of helping to ensure that each agency undertakes health information technology activities primarily within the areas of its greatest expertise and technical capability and in a manner towards a coordinated national goal."

This type of coordination is crucial to best harness and leverage federal investments. As private-sector partners that seek to achieve these shared goals, hospitals and health systems will benefit

from a clear picture of the activities that will be undertaken by the federal government. To that end, we encourage you to refine the strategic plan to spell out clearly the unique federal roles and activities that can be used to assess progress toward the desired outcomes, rather than addressing broad health system goals.

Clearly, the broad goals outlined in the strategic plan are important for the nation. However, from the perspective of limited federal resources to make progress in the area of health IT, the AHA believes that some goals should be prioritized over others. For example, two of the objectives under the second goal are a prerequisite to fulfilling other goals and should, therefore, be addressed first:

- Enable individuals, providers and public health entities to securely send, receive, find and use electronic health information.
- Identify, prioritize and advance technical standards to support secure and interoperable health information.

As noted briefly in the draft, progress in this area also relies on solving the problem of correctly matching patients to their records, as well as other methods to authenticate accurately information across data sources. The AHA urges ONC to build on the work it started in 2014 to make progress on patient matching. This work should explore ways to leverage other federal efforts to identify and authenticate individuals for participation in public programs (such as the federal health insurance exchange) and in cyberspace (such as the activities of the National Institute for Science and Technology).

To our thinking, a strategic plan sets goals, but also provides the specific steps needed to achieve the goals and lists the resources required. Indeed, HITECH tasks ONC with developing a strategic plan that includes "specific objectives, milestones, and metrics." This level of detail would benefit private-sector partners seeking to align their goals and understand how the federal government will act in the future. To that end, the AHA encourages ONC to provide more details on how goals will be met, including specific activities by individual agencies, expected timelines for completion of those activities, and an assessment of whether existing federal resources are sufficient to complete all of the goals outlined. We also recommend that ONC establish a website or other publically accessible forum to provide transparency on agency progress in executing the plan.

We note that, while this is a federal health IT strategic plan, it assumes investments and activities by the private sector, such as "incorporating precision medicine and predictive modeling into care delivery." While these goals are certainly shared outside the federal sector, it would be helpful if the strategic plan were accompanied by an evaluation of whether these expectations map to the strategic priorities of your private-sector partners, and whether current market dynamics and private-sector resources are sufficient to support them. This evaluation should be done in the context of the other federal requirements currently placed on the health care sector, which has experienced a tremendous increase in regulatory burden over the past decade.

In closing, we thank you for putting forward this ambitious strategic plan. Hospitals and health systems across the country are making tremendous efforts to leverage the benefits of health IT. They need a complete and accurate picture of how federal investments and activities will be

coordinated to move forward on interoperability and create a more efficient infrastructure for the overall exchange of health information.

If you have any questions or need further information, please contact Chantal Worzala, director of policy, at (202) 626-2324 or cworzala@aha.org.

Sincerely,

/s/

Linda E. Fishman
Senior Vice President
Public Policy Analysis and Development