May 21, 2024

Micky Tripathi, Ph.D., M.P.P.
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C St SW
Washington, DC 20416

Dear Dr. Tripathi,

The HIMSS Electronic Health Record (EHR) Association appreciates the opportunity to provide support and feedback on the Draft 2024-2030 Federal Health IT Strategic Plan. Our work aligns well with the Federal Health IT mission and vision; together, the 28 member companies of the EHR Association seek to improve the quality and efficiency of care through innovative, interoperable health information technology adoption and use. We envision a healthcare ecosystem that leverages the capabilities of EHRs and other health information technology to efficiently deliver higher-quality care to patients in a manner that is productive and sustainable.

We commend the efforts of the Office of the National Coordinator for Health Information Technology (ONC), via its Strategic Plan, to enhance individual and community health through improved healthcare experiences, advanced research and innovation, and integrated health data systems. In addition to the specific comments below, the members of the EHR Association stand ready to assist your team with early input on realistic expectations and timelines for regulations targeting these crucial goals.

Interoperability and Health IT Standards

Connecting disparate health systems has transformed the healthcare landscape by enabling clinicians to make informed decisions, providing patients with access to their health data, enhancing public health reporting and research, and reducing provider burden while supporting the shift towards value-based care. To further innovate in healthcare, it is essential to establish and advance baseline standards that ensure broad data access and support the development of additional data exchange mechanisms. For a truly nationwide health data exchange ecosystem, policymakers and industry leaders must focus on the continuous development and adoption of robust standards, implementation guides, and testing tools.

The EHR Association supports the Plan's goal to enhance care delivery through improved interoperability and the adoption of national standards such as HL7 FHIR. We have long advocated for streamlining health information sharing and reducing compliance burdens, thereby enabling more effective and efficient health IT solutions across care settings.

AdvancedMD	Elekta	Greenway Health	Netsmart	Sevocity
Altera Digital Health	EndoSoft	Harris Healthcare	Nextech	STI Computer Services
Athenahealth	Epic	MatrixCare	NextGen Healthcare	TruBridge
BestNotes		MEDHOST	Office Practicum	Varian – A Siemens Healthineers Company
CureMD	Flatiron Health	MEDITECH, Inc.	Oracle Health	
eClinicalWorks	Foothold Technology	Modernizing Medicine	PointClickCare	Veradigm

The EHR Association is committed to collaborating with the ONC as it further defines the Trusted Exchange Framework and Common Agreement (TEFCA), building on these capabilities to accelerate the adoption, success, and expansion of a trusted exchange framework as envisioned by the Cures Act. This includes a focus on aligning other data-sharing networks with TEFCA to minimize and align frameworks at the national level.

Privacy and Security of Health Information

EHR technology is pivotal in safeguarding the privacy and security of patient health data, particularly within an increasingly connected health IT ecosystem. EHR Association members are dedicated to developing and implementing software, services, and business practices to maintain patient privacy through secure data handling. As an association, we advocate for stringent controls on the use, disclosure, and sale of identifiable patient data, mandating explicit informed consent from patients and setting high standards for breach notifications and security protocols.

The EHR Association encourages a collaborative approach between industry and government to advance technologies to maintain the protection, privacy, and security of individuals' electronic health information (EHI). Guidelines must be established that balance innovation with risk management, emphasizing transparency and non-discrimination. We support the Plan's strategy to provide guidance and resources to help healthcare organizations integrate high-impact cybersecurity practices, such as the NIST Cybersecurity Framework.

To enhance privacy measures, we suggest that it is critical to modernize data protection laws to extend HIPAA-like protections to all entities holding identifiable health data, regardless of their current regulation under HIPAA. Additionally, the EHR Association supports simplifying consent processes and aligning local privacy rules to reduce the complexity and inconsistency currently challenging data stewards and patients. This includes creating clear criteria for informed consent and setting boundaries for the permissible use of health information.

Patient Safety and Quality of Care

Ensuring patient safety in an evolving, complex, data-rich system requires a continuous feedback loop in a non-punitive, collaborative learning environment. With a longstanding commitment to patient safety, EHR developers work to support the best possible care for patients with a clinician experience free from undue burden.

Well-aligned with ONC's principle of bringing together stakeholder communities to improve patient experiences and outcomes, the EHR Association supports the active involvement of all stakeholders in patient safety initiatives. Providers, patients, healthcare organizations, human factors and usability experts, technology and security experts, and policymakers all contribute unique and valuable perspectives.

The EHR Association is committed to enhancing patient safety through standards-based product design, collaborative health IT-related patient safety event analysis, and sharing best practices for the deployment and maintenance of health IT. Together, our members seek to facilitate client and patient reporting of safety issues, promptly address software problems that could impact patient safety, and promote a culture of safety within health IT organizations.
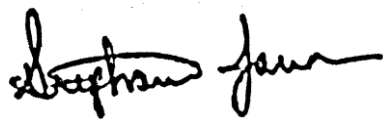
Health Equity and Access

The persistence of gaps in care along social and demographic lines represents a major patient safety issue. As the primary systems of record and the agents of interoperability, EHRs are well-positioned to introduce the front-line tools to combat disparities in care. However, they must work in conjunction with a larger socio-technical environment that reduces stigma and mistrust around data collection; adequately funds healthcare systems and community-based organizations that must partner to address disparities; and prioritizes safe, effective, and standards-based sharing of this information.

We support the Plan's emphasis on increasing health equity across all populations by advancing the use of data to represent social needs and the conditions in which people live, learn, work, and play. To address the barriers to delivering equitable, socially informed care, the EHR Association recommends an approach to capturing social determinants that standardizes high-level domains (e.g., transportation insecurity, housing insecurity, etc.). However, we recommend allowing for flexibility in how individual organizations assess risk.

Finally, the EHR Association continues to support policies to expand access to quality care and reduce or eliminate health disparities – including funding for technologies that enable the digital delivery of healthcare in underserved areas, the standardization of electronic referrals to community-based organizations, and permanent Medicare telehealth reimbursement free from artificial barriers such as in-person visit requirements and geographic restrictions.

Thank you for your consideration, and please let us know if we can expand on any of these topics. The EHR Association remains committed to collaborating with the ONC and other key stakeholders to strengthen the ethical and equitable design, implementation, and use of health IT that serves all populations.

Sincerely,

Stephanie Jamison
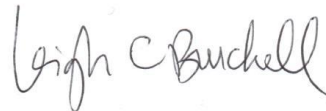Chair, EHR Association
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William J. Hayes, M.D., M.B.A.
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