This is a carefully constructed and thought-out plan. I have just two comments.

Objective 1a: Most patients won’t even consider the security of their information when they send their PHI to mobile apps or other health IT platforms. Without reading the fine print they could be giving their data away to be sold not understanding how easy it is to re-identify their data. All the major EHR platforms have great options for interoperability. As a health system we do not have any problems accessing or sending patient data to other providers or to the patient. What is not considered in this plan is a national patient identifier. This is critical to the success of interoperability. Our most fragile populations don’t have social security numbers like refugees and small children.

Objective 1c: We are working hard to implement an effective Social Determinants of Health program. I am confident that the community-based organizations that provide these services will not have the requisite funding to take on the case load that will be directed through SDOH programs. Most of these agencies are already under-funded and over-burdened. Federal funding for these programs, perhaps based on annual volume, needs to be contemplated in relation to this plan. In addition, these agencies will not have the funding to build the secure IT systems required for this objective.

**Please note that these comments reflect my personal views as a Health IT professional. They do not reflect the official views of my organization.**