



May 28, 2024

Mickey Tripathi, Ph.D.  
Department of Health and Human Services  
Office of the National Coordinator for Health Information Technology  
330 C St., SW, 7th Floor  
Washington, DC 20201

Submitted electronically via: <https://www.healthit.gov>

Dear Dr. Tripathi:

Thank you for the opportunity to provide comments on the Office of National Coordinator for Health IT (ONC) draft 2024-2030 Federal Health IT Strategic Plan. We appreciate the effort undertaken by more than 25 federal organizations to draft a plan aimed at delivering care and improving patient health.

Consensus Cloud Solutions, a publicly traded company, is a global leader in digital cloud fax technology and a trusted provider of interoperability and data extraction solutions. With over 25 years of success offering digital cloud faxing, we have evolved to be a trusted provider of interoperability solutions leveraging artificial intelligence and secure data exchange to transform digital information, automate critical workflows, and maximize operational efficiencies. Consensus maintains industry-leading compliance standards, making it a preferred partner for heavily regulated industries including healthcare. Consensus has filled a crucial void in the ongoing transition to electronic information exchange. With this wealth of knowledge, we are pleased to provide ONC with commentary on the Strategic Plan.

The ONC Strategic Plan encompasses four goals: Promote Health and Wellness, Enhance the Delivery and Experience of Care, Accelerate Research and Innovation, and Connect the Health System with Health Data. We address each of these goals and their respective objectives below.

### **Goal 1: Promote Health and Wellness**

Consensus agrees on the importance of utilizing digital tools to improve health management, ensuring equitable access to the latest technologies for patients and communities, a key focus for this goal. It is crucial to note that unlocking unstructured data, prevalent in healthcare and especially in underserved care settings, is essential to leveraging public health data effectively. Translation services, such as those offered by companies like Consensus, play a critical role in promoting equity.

For stakeholders to leverage individual, population, and public health data effectively, information must be accessible across various care settings in a digestible format. Fax technology serves as a primary communication tool in economically challenged communities, but unstructured documents like faxes and PDFs can also be structured with extraction technology using Natural Language Processing (NLP) and Artificial Intelligence (AI). This facilitates greater assessment, transparency, inclusion, resilience, and learning within and across

the health system and the communities served as well as contributes to the efforts for public health data modernization.

Healthcare providers need to share Electronic Health Information (EHI) to serve their communities effectively. While much of the data for social programs remain unstructured or filled out in forms, structuring this data is feasible using NLP and AI, enabling secure data exchange to improve care and administer social programs effectively.

## **Goal 2: Enhance the Delivery and Experience of Care**

We commend ONC for promoting the use of health IT and modern technologies in clinical workflows to support clinicians in providing high-quality, safe, efficient, and evidence-based care. While we fully support ONC's desire to promote such modern technologies through nationally adopted standards for interoperability and provide and operate corresponding platforms and services, we view it as crucial to recognize that many care settings do not have the technology to comply. Consensus works with providers who often lack the resources to purchase an Electronic Health Record (EHR) system. These providers operate with various health record solutions, generating a significant amount of unstructured data that needs to be integrated into provider's workflows. Seamless data sharing across care teams, including unstructured data, is essential for patient support across health and human services interactions.

Supporting this goal also involves enhancing public health data, much of which is unstructured as well. Providing solutions for seamless data sharing and population of public health registries can be achieved with technology that converts unstructured data into structured data. Incorporating data translation solutions allows individual health information to be available across care settings for use in patient care and public health analytics.

Supporting this goal is a new focus on Decision Support Intervention (DSI). Increased transparency and understanding of health data in algorithm-based decision support tools are critical. With the growth of AI in healthcare, there is potential to address challenges using generative AI. Another type of AI is intelligent data extraction to release structured data from source documents, such as PDFs, scans, TIFFs, or handwriting can provide insight at the point of care, displaying confidence in such decision support solutions. This is also true for Social Determinants of Health data (SDoH), which are shared in various formats. Data extraction companies can transform unstructured order forms into structured data, creating standardized and interoperable SDoH for improved patient care.

We commend ONC for adding the challenges of prior authorizations as a goal to improve the experience of care. We acknowledge the problems posed by prior authorization, slowing patient care and creating frustrations for providers and workflow issues for payers. Moving to the FHIR API for prior authorizations can lead to better patient outcomes for providers that actually can support this standard. For the many providers that often justifiably lack that capability, technology can be put to work to help bridge the gap by converting unstructured prior authorization forms to structured FHIR forms, supporting the standard without disrupting care for vulnerable populations.

### **Goal 3: Accelerate Research and Innovation**

While accelerating research and innovation is desirable, our concern is the abundance of unstructured data in underserved communities, leading to potential biases in research. Federal funding should be considered to invest in addressing this issue to ensure equitable representation in research. Streamlining access to linked health and human services data sets securely allows for enhanced population health planning. Hence, structured data must be extracted from unstructured datasets, including those not captured by EHRs, to ensure equitable data representation.

In order to have the largest data set for analysis, structured data must be pulled from unstructured datasets and populated into research databases. This can be done with intelligent data extraction. Additionally, evaluating common data elements for opportunities to harmonize for improved interoperability must account for data that is not included in EHRs. To keep data sets equitable, the data included must be extracted from all care settings including those in underserved markets that do not have the same level of data mining.

### **Goal 4: Connect the Health System with Health Data**

We commend ONC for providing resources to support health IT adoption and use, focusing on affordable and accessible technologies, especially in underserved areas. While moving towards a national standard for data sharing is important, prescriptive standards with punitive compliance may hinder patient and provider interests. National standards should allow flexibility for alternative affordable technology, considering the skill set in areas lacking appropriate staff.

Interoperability efforts should be inclusive, ensuring all care settings can adopt standards like the Trusted Exchange Framework and Common Agreement (TEFCA). Equitable use of such frameworks should provide for the inclusion of all data types and translation technologies that can share data in any format can help bridge the gap for providers unable to adopt standards.

Increasing data linkages across diverse data sets is crucial, considering that 80% of healthcare data is unstructured. Intelligent data extraction can make relevant information accessible for decision support through continuity of care especially for our most vulnerable patient populations.

In conclusion, we commend ONC for the Draft 2024-2030 Federal Health IT Strategic Plan and appreciate the opportunity to provide feedback. We support ONC's commitment to improving health experiences and outcomes for individuals, populations, and communities while promoting opportunities for health equity, scientific innovation, and modernizing public health infrastructure. We look forward to collaborating with the agency to advance these goals for all stakeholders now and in the future.

Sincerely,



Bevey Miner  
EVP, Healthcare Strategy and Policy  
Consensus Cloud Solutions<sup>1</sup>



John Nebergall, CPA, MBA  
Chief Operating Officer  
Consensus Cloud Solutions

---

<sup>1</sup> If you have any questions about the material discussed in this comment, please contact Bevey Miner at [bevey.miner@consensus.com](mailto:bevey.miner@consensus.com) or 323-860-9200.