

May 28, 2024

Dr. Micky Tripathi, National Coordinator
Department of Health and Human Services
Office of the National Coordinator of Health Information Technology

Submitted electronically at <https://inquiry.healthit.gov/support/plugins/servlet/desk/portal/2>

In reference to *2024-2030 Federal Health IT Strategic Plan*

Dear Dr. Tripathi,

On behalf of Point of Care Partners (POCP), a leading health information technology (HIT) consultancy with over two decades of industry experience, we appreciate the work being progressed by the Office of National Coordinator Health Information Technology (ONC) and also your continued coordination between the various Health and Human Services (HHS) Agencies.

POCP appreciate the opportunity to provide commentary and feedback on the recently published Federal Health IT Strategic Plan 2024-2030. We commend the ONC for its vision and strategic direction, particularly in areas that enhance care delivery, support research and innovation, and promote health data connectivity.

We believe that the successful implementation of this strategic plan requires additional emphasis on several critical areas and offer our perspective as follows relative to those areas:

Practical Implementation Guidelines: We advocate for the inclusion of detailed, actionable guidelines to aid smaller healthcare providers. Many such entities lack the resources to implement complex HIT systems. Clear, step-by-step implementation guidance would greatly facilitate technology adoption and integration.

Workforce Development: A comprehensive strategy to build and maintain a robust health IT workforce is crucial. We recommend and support your focus on establishing ongoing training and support initiatives to ensure that healthcare professionals are well-equipped to utilize emerging technologies.

Cybersecurity Enhancements: In light of increasing cyber threats, it is imperative to develop robust cybersecurity frameworks that are specifically tailored to protect patient data and the integrity of health IT systems within the healthcare sector.

Interoperability and Data Standards: Continuous development, adoption and certification of interoperability standards are essential, particularly those that accommodate innovative data types such as genomics and digital therapeutics. It is also critical to integrate pharmacies and pharmacists into these standards, processes and certification, acknowledging the work being done by entities such as the National Council for Prescription Drug Programs (NCPDP) and Health Level 7 (HL7). We are also supportive of the continuing and advancing work through the Trusted Exchange Framework and Common Agreement and believe this an incredible opportunity to facilitate much needed data fluidity in healthcare to support patients in their care journey.

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Health Equity: We propose the development of health IT solutions with a strong focus on reducing health disparities. This includes designing technologies that are accessible to individuals with disabilities and underserved populations.

Innovation and Public-Private Partnerships: Enhancing innovation through robust public-private partnerships will drive the next wave of advancements in health IT. Such collaborations are vital for integrating cutting-edge technologies into mainstream healthcare practice.

Patient-Centered Design: POCP supports the continued focus by ONC and other HHS agencies on patient-centered technology, data exchange and policies as this is a vital need in healthcare. It is also vital to incorporate patient-centered design principles in health IT solutions, ensuring that technologies enhance patient engagement and overall experience.

Compliance and Oversight: Strengthening oversight mechanisms and introducing civil monetary penalties for non-compliance with health IT regulations will ensure adherence and accountability.

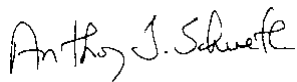
Evaluation Metrics: Establishing clear metrics and evaluation frameworks to assess the impact of health IT initiatives on healthcare outcomes and cost-effectiveness is essential for continuous improvement.

Support for Small and Rural Providers: Targeted support for small, rural, and community-based providers is essential to overcome barriers to adopting and optimizing health IT solutions.

In addition, as artificial intelligence (AI) plays a growing role in healthcare, particularly in areas like prior authorization and decision support systems, we are supportive of the recent focus by the ONC and others on this area. Transparency and patient consent in the deployment of these technologies is very important. We support ONC's continued focus in these areas. We are keenly aware in the challenges related to patient consent and are involved in many standards efforts to solve for this challenge including work via the HL7 FAST Accelerator. We encourage the ONC's to become involved and engaged in the HL7 *FAST* efforts where various stakeholders are coming together and are committed to solve this challenge. We also and support the development of and required use of standard auditing processes for AI in healthcare to ensure algorithms are transparent, fair, and free of biases.

We appreciate the opportunity to comment on the strategic plan and look forward to collaborating further to enhance the nation's health IT infrastructure. Please do not hesitate to contact us if we can be of assistance.

Sincerely,



Tony Schueth, CEO
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