To [ONC}

Regarding: Responses to ONC roadmap

Dear ONC members.

As a collaborative of community health information organizations, the Texas Association of Health Information Organizations (TAHIO) has reviewed and discussed your ambitious roadmap. TAHIO represents 9 out of 10 operating non-profit community Health Information Exchanges in Texas, covering approximately 70% of Texas residents. The organization facilitates collaboration among members and integration with the State office of eHealth as well as the Texas Health Service Authority. The organization further closely collaborates with Texas Medical Society and the Texas Hospital Association. TAHIO members joined together to prepare the following observations to the plan.

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| **Page** | **Goal** | **Strategy** | **Recommendation** | **Rationale** |
| 14 | 2A | 5 | Include “at reasonable cost” | In the community HIE world, the cost of onboarding providers is high and prohibitive to providers and thus makes health information exchange dependent on third party incentives. To date there has been little tangible efforts from some EMR companies to accommodate exchange at a reasonable price point |
| 15 | B2 | 3 | TAHIO strongly supports this effort | HIEs are increasingly challenged to aggregate disparate patient data. Despite the standardized methods of exchange ( HL7, CCD-A) there remains extensive variability in the content of these standardized exchange. |
| 16 | 2C | 5 | TAHIO strongly supports this effort | HIEs share data across providers and may not always have control over end-users. Any coordination in providing safeguards, alerts about possible security vulnerabilities will reduce the risk for data sharing and increase the public’s trust |
| 18 | 3A | 3 | TAHIO strongly supports this effort | Verification tools will aid in providing more reliable data sets and thus improve quality measurements and the value of shared data to improve decision support across systems. |
| 18 | 3A | 5 | TAHIO strongly supports this effort | Community HIEs have the ability to combine person-reported data with clinician-reported data to provide more complete patient profiles for treating providers |
| 22 | 4A | 1 | TAHIO supports this effort | Making individuals the stewards of their health data will encourage their engagement. However, providers should be made aware if information has been redacted outside legal requirements.. |
| 23 | 4B | 1 | TAHIO strongly supports this effort | Aggregate patient data, present in community HIEs, and real-time, can aid public health officials in identifying potential outbreaks, resource allocations in a cost efficient way.  |
| 23 | 4B | 4 | TAHIO strongly supports this effort | Several HIEs have created arrangements for emergency access to a provider portal in case of evacuations or patient triaging during emergencies and disasters |

We believe that community Health Information Exchanges play a critical role in the transition of healthcare from a fee-for-service to an outcomes driven system. Furthermore, HIE strongly supports the overall goal of better health, better healthcare at reasonable rates.

As an organization, TAHIO is ready to support ONC efforts in its effort to reform healthcare to a practical and cost effective technology supported healthcare environment.

In good Health,

TAHIO