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Donald Rucker, MD
National Coordinator for Health Information Technology
Office of the National Coordinator
U.S. Department of Health and Human Services
330 C Street, SW, Office 7009A
Washington, DC 20201

RE: *Comments on Federal Health IT Strategic Plan 2020-2025*

Dear Dr. Rucker,

Cerner Corporation (Cerner) is pleased to respond to the draft 2020-2025 Federal Health IT Strategic Plan. We applaud the ONC for its efforts.

For 40 years, Cerner has worked at the intersection of health care and information technology to connect people and systems around the world. We use the latest technology to create solutions that give communities and people the opportunity to engage in their own health. Our solutions are used by more than 690,000 providers and are licensed in more than 27,000 facilities in 35 countries. It's our mission to relentlessly seek breakthrough innovation that will shape the health care of tomorrow.

We believe health IT has the potential to enhance the flow of information across the health care system to improve quality, efficiency, and safety while serving as the infrastructure to enable care transformation. From our perspective as a health IT innovator, we offer for your consideration observations and feedback for objectives, goals and strategies included in the proposed Federal Health IT Strategic Plan.

1. Promote Health and Wellness

Health care is progressively transitioning from a reactive approach to one that is proactive and consumer-centric. Technologies and services should be designed to provide individuals with personalized tools and resources to be knowledgeable, active participants during all stages of their health and well-being journey. And we are committed to empowering individuals to better manage their health and well-being and connect them with their care team and community in a manner that is personal and trustworthy. We agree individuals should have access to their health information and have greater portability. We also agree with the objectives and strategies laid out under this goal.

We prioritize the need for well-developed regulatory oversight of consumer apps. Once a patient's information is downloaded to an app, it is no longer protected by HIPAA unless the app is sponsored by a HIPAA-covered entity. Consumers need better understanding and control over their health record and personal health information once they allow an app developer access to their personal health information, as well as more education to better understand the intended use of their data.



At the community-level, consideration should be given to incentives to share data for research. Generally, we support further thought and discussion into ways to motivate consumers to share or donate their data for research purposes. As improvements are considered to address communities' health IT needs, attention should be paid to assessing non-care supports and services. Communities often need help planning and paying for non-medical needs.

2. Enhance the Delivery and Experience of Care

We agree, health IT is a vital tool for addressing and improving quality of care and consumer choice. Electronic Health Record (EHR) use should promote and support safe and effective patient care. Patient information presentation should be clear and unambiguous, and consumers should use health IT to feel more knowledgeable and actively participate in shared decision-making about their health and wellness.

As technology and infrastructure advancements relating to telehealth and telemedicine have matured, the number of use cases has expanded to become part of larger virtual health care delivery models. We believe that traditional industry terms such as "telemedicine" and "telehealth" will wane as virtual technology and workflows will become a standard of delivering a variety of health and care services. Using an ecosystem of virtual and remote services and technology organizations will be able to provide care at a distance, enabling the delivery of quality cost effective care anywhere.

We prioritize the need to deal with sensitive health information. We believe federal regulations such as 42 CFR Part 2 create significant barriers to health data use and exchange by restricting access to information and preventing many providers from being able to see the complete picture of what is happening with their patients. Defining what sensitive health information is would have an immediate impact.

We also prioritize the need to reduce regulatory burden by aligning various proposals, quality measures, and reporting requirements across different payer types. For entities that historically didn't receive incentives for use of health IT and do not have wide adoption rates (ex. home health providers and LTPAC), we support efforts to continue the ramp up of technology vs. punishing the lack of health IT at the onset.

3. Build a Secure, Data Driven Ecosystem to Accelerate Research and Innovation

As the ONC points out, the goal of any organization should be to deliver high quality, safe, person-centered care in an integrated system with data from various touchpoints. We believe the best way to manage the health of a population is one person at a time. By turning data into knowledge, people and their care providers can work more efficiently and effectively together, cultivating a mindset of proactive health, rather than reactive care. Our strategy for population health management is to know the population in order to focus attention, find and engage citizens to take an active role, and actively manage each individual to improve their health and wellbeing.

With the growth of Artificial Intelligence (AI), these technologies have the potential to transform the health care ecosystem. However, AI solutions should promote better and more efficient care but not be used as a replacement for clinicians. Additionally, augmented intelligence focuses on



AI's assistive role, emphasizing the fact that cognitive technology is designed to enhance human intelligence rather than replace it. We believe this technology will help drive research and innovation over the next five years and beyond.

We also prioritize the need to improve harmonization of data elements and standards. However, we suggest that many opportunities to harmonize do not require regulatory driven standards, but rather continuous evolution of experiences and best practices. Collaboration across the vendor and user community shows more promise of improvement than development and introduction of prescriptive standards that have a substantial risk to create solutions.

4. Connect Healthcare and Health Data through an Interoperable Health IT Infrastructure

We agree health information should move freely across organizations and geographies. We are committed to harnessing innovation to support open and interoperable platforms. Our solutions enable the flow of information access across disparate systems. And we support a collaborative development community and policies that push for the adoption of Application Programming Interfaces (APIs) so consumers and providers can use the applications of their choice to access electronic health record information. We were pleased to see the recent release of the 21st Century Cures Act final rule and fully support the ONC's efforts to advance interoperability.

We prioritize allowing Health IT vendors and app developers to collaborate. Embedding consumer-centric apps in the EHR can drive patient engagement, increase awareness of health care costs, and improve overall health outcomes. We also prioritize the importance of health IT safety and user-centered design. Patient information presentation should be clear and unambiguous. ONC should focus on defining the principles of usability and user centered design for HIT vendors vs. prescriptive detailing of "how." User interface design should follow minimum design process standards and support clear navigable pathways.

We applaud the ONC's efforts and are pleased with the goals and strategies laid out in the Federal Health IT Strategic draft plan. We believe the four overarching goals will continue to help propel transparency, competition, and consumer choice over the next five years. Cerner understands the importance of collaboration across the healthcare industry to action ONC's vision and mission. And we believe ONC's focus on person-centered care is a priority while promoting care quality, efficiency, and safety. We support the secure exchange of health information both to support patient care as well as encourage innovation. Please do not hesitate to contact me if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads 'Lindsay Jager'. The signature is fluid and cursive, with a large loop at the end of the last name.

Lindsay Jager
Senior Strategist, Public Policy & Federal Government Affairs