April 1, 2020

Donald W. Rucker, M.D.

National Coordinator

Office of the National Coordinator for Health Information Technology Department of Health and Human Services

200 Independence Avenue, S.W.

Washington, DC 20201

Re: 2020-2025 Federal Health IT Strategic Plan

Dear Dr. Rucker:

Thank you for the opportunity to submit comments to the Office of the National Coordinator for Health Information Technology's (ONC) on the Federal Health IT Strategic Plan 2020-2025. Overall, MedInformatix Inc., a Health IT innovator, supports the high-level goals, objectives and strategies identified in the Strategic Plan with emphasis on promoting interoperability and data sharing through widely accepted standards.

MedInformatix is a pioneer in Practice Management (PM) and Electronic Health Records (EHR) and a leading national IT solutions provider of data and workflow solutions to the radiology and ambulatory healthcare industry. Our goal is to deliver healthcare information technology via certified electronic health records, radiology information systems solutions and enterprise practice management. Helping practices of all sizes achieve delivery of excellent patient care through optimal data and workflow efficiency.

We appreciate the opportunity to review your proposed 5-year strategic plan designed to fulfill the requirements of the 21st Century Cures Act. MedInformatix supports goals such as industry wide interoperability, decreased provider burden and better patient access to their own health records. We support ONC's efforts in leading the industry to achieve these goals.

General Comments

We are encouraged by this Administration's efforts to accelerate health information and technology adoption, information exchange between interoperable systems, and improving the quality of care using innovative technology and standards.

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MedInformatix commends the work undertaken to advance interoperability; promises to assist in this endeavor by prioritizing our resources and aligning efforts to deliver features and functionality that provide the ultimate connectivity between physicians, patients and the practice. Our products enable patient data to seamlessly flow through the administrative and clinical functions thus improving the quality of patient care and enhancing speed and accuracy. We support the efforts in developing industry standards and policies for secure, standards-based application programming interfaces (APIs) and promoting user-focused technologies. As ONC develops regulations and policies around these important goals and objectives we will be available to provide input from a HIT-EHR vendor perspective. Providing secure patient access to their health records and decreasing provider burden are goals that we fully support.

MedInformatix has the following specific comments on the Strategic Plan:

- The draft sets forth the "what ONC wants, why you want it and who benefits," but does not describe the specifics of how ONC expects to get there. There is little implementation detail, and while its goals and strategies provide some level of detail, they are forward-looking and do not address specific issues that the regulated health care industry faces. As ONC works on the implementation details of the work outlined in the goals and objectives we recommend that this work be prioritized and staged. This allows the industry to secure the right resources to implement timely solutions.

- Before expanding patient access to their health care records, we need to ensure patients and EHR vendors, sharing this data, have confidence that download, and transfer functions are private and secure.

- We recommend the creation of a National Registry for Third Party App Vendors, similar to the CHPL listing. This will allow a HIT vendor connecting to multiple EHRs a place to register, ensuring all information is covered from endpoint to endpoint.

- We recommend that the Strategic Plan include information on how ONC plans to measure the work under the objectives and strategies, this will help our industry understand the end goal and will allow ONC to measure and assess progress over time. Specifically, we recommend the goals/objectives follow the SMART criteria – goals should be specific, measurable, achievable, realistic and timely.

- We welcome the strategies that call on education, understanding and development of resources for health IT professionals and patients. All stakeholders and patients that would be empowered with easy and efficient access to their health information and control the use of the data, will need to be completely aware of and understand the requirements and options available to them. Consumer education focus - Education is needed to empower patients to make informed decisions, including how to recognize consumer-focused apps that respect privacy and security in a fully transparent manner. This educational effort should be led by HHS working with stakeholders across the industry.

- The electronic health record should be able to capture Social determinants of health to be acted upon by the provider, where appropriate. There currently is little standardization of this data. We recommend that ONC looks for new standards requiring the capture of social determinants, perhaps as part of (or additions to) revisions to the USCDI (US Core Data for Interoperability).

- We support ONC's research on the many aspects associated with Unique Patient Identifiers; we need a solution to assist in better identifying the patient. Patient matching is a complex challenge the industry needs to resolve. We encourage the creation of a National Directory shared by all healthcare providers allowing the look up of patient by multiple identifiers.

- We recommend the continued support of the large installed base of the X12 standard in use today. This will allow the industry to achieve interoperability faster. X12 and HL7 should continue to work together to define mappings between FHIR® and the X12 standards.

- ONC's focus on reducing administrative burden through the many initiatives out of Patients Over Paperwork is greatly appreciated. The Strategic Plan has not taken into consideration the impact, if any, that each initiative has had on provider workflow and clinician frustration. We are requesting more clarity on the intent of the proposed strategy to "Monitor the impact of health IT on provider workflows". Can you measure the impact of Health IT independently from the impact of regulation on provider workflows? Both health IT and regulatory requirements are naturally interconnected. We, as an EHR, provide the supporting tools to achieve the regulatory requirements which are separate from the healthcare delivery experience that frustrate providers. ONC could play a valuable part in helping stakeholders understand the difference and have collective discussions on what really needs to be changed to be able to realize positive impact.

- We support the strategy to "improve harmonization of data elements and standards" as the industry should focus on moving away from an unstructured data capture to a coded

nomenclature. We favor more standardization and specificity for common data definitions and data exchange protocols in order to exchange data between EHRs via APIs.

- We recommend the development of baseline standards to support vital data access. Collaboration between stakeholders and the government is important to help advance Innovation in healthcare. For our industry to continue to explore new technologies and innovation, industry-wide adoption of standards is key.

MedInformatix supports innovation in Health IT, patient access to their health care data in a secure and private manner and creating solutions for providers that facilitate more automated workflows and thus reduce physician burden. In order to realize a nationwide exchange of health data, policymakers and the industry at large must focus on development and adoption of robust standards, as well as implementation guides and related testing tools. We thank you for allowing us to share our thoughts on the 2020-2025 Federal Health IT Strategic Plan draft.

Sincerely,

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