

May 28, 2024

The Honorable Micki Tripathi, Ph. D.

National Coordinator for Health Information Technology

Office of the National Coordinator for Health Information Technology

Mary E. Switzer Building

330 C Street S.W.

Washington, D.C. 20201

RE: 2024-2030 Federal Health IT Strategic Plan Draft for Public Comment

Dear Dr. Tripathi:

The Healthcare Leadership Council (HLC) welcomes the opportunity to provide comments on the Office of the National Coordinator for Health Information Technology's (ONC) Draft 2024-2030 Federal Health IT Strategic Plan (Draft Plan).¹ HLC appreciates the continued efforts of the federal government to use health IT as a catalyst to empower patients, lower costs, deliver high-quality care, and improve health for individuals, families, and communities. We applaud the vision of this Draft Plan and ONC's request for input from a wide range of healthcare stakeholders.

HLC is a coalition of chief executives from all disciplines within American healthcare. It is the exclusive forum for the nation's healthcare leaders to jointly develop policies, plans, and programs to achieve their vision of a 21st century healthcare system that makes affordable high-quality care accessible to all Americans. Members of HLC – hospitals, academic health centers, health plans, pharmaceutical companies, medical device manufacturers, laboratories, biotech firms, health product distributors, post-acute care providers, homecare providers, group purchasing organizations, and information technology companies – advocate for measures to increase the quality and efficiency of healthcare through a patient-centered approach.

Overview

After reviewing the ONC's Draft Plan, we continue to support the administration's reiterated goals to: promote health and wellness; enhance the patient care delivery and experience; accelerate research and innovation; and, expand health system data interoperability. The progress achieved in the past five years as contemplated by the 2020-2025 Federal Health IT Strategic Plan is significant and well-delineated both in terms of the development of federal standards and certification as well as industry adoption and reporting. As technology rapidly evolves and data capabilities are leveraged, the need for specific, deployable principles clarifying overarching priorities is needed now more than ever before. The Draft Plan's six principles reflect the values of HLC's members in the application and use of information technology within the healthcare sector. Given the progress made by the government and industry alike, as well as the clarified principles, it is appropriate that the Draft Plan's objectives have evolved and become increasingly precise. Of note, the Draft Plan stipulates what the federal government plans to do to achieve each objective as well as the reason ("so that") driving the prioritized action.

These additional levels of transparency and clarity into the "how" and "why" are welcome additions. As the administration collects input to finalize its plan for 2024-2030, HLC looks forward to continued collaboration to advance private sector action and inform federal government decisions. We appreciate the opportunity to continue to: empower access to advance individual engagement

¹ https://www.healthit.gov/sites/default/files/page/2024-03/Draft_2024-2030_Federal_Health_IT_Strategic_%20Plan.pdf

with health information; leverage the capabilities of technology to improve the patient experience; use data responsibly to maximize data utility by providers and in public health; and, further integrate health and data systems to ensure all patients benefit from these efforts.

Empower Access to Health Information

We applaud ONC's continued efforts to strengthen the ability of patients, healthcare providers, and payors to exchange health information and give patients greater autonomy over their own health data. HLC members are committed to sharing comprehensive access to health data consistent with applicable privacy, proprietary, and security protections.

Improving operability and security around an individual's access to his/her/their health information supports the Draft Plan's first goal to promote health and wellness. Ensuring that individuals can easily obtain, use, be notified, and share their electronic health information empowers them to be actively engaged in their healthcare to manage and achieve their health goals. Individuals who are actively engaged in their healthcare are better able to manage their health conditions and remain healthy. We believe providers, payors, and technology developers should engage individuals to identify and prioritize information access expectations.

Leverage Technologies' Capabilities

HLC has recently submitted comments detailing the importance of [telehealth](#) and [artificial intelligence](#) (AI) to our members and are excited by ONC's support of these new technologies. As we look to the future, remote access to care will be increasingly important; the potential for responsibly implemented AI to augment decision-making and decrease administrative burdens on providers is too great to ignore. How to account for these rapidly developing technologies is an ongoing discussion among policymakers; the support expressed in the Draft Plan encourages the private sector to engage in a shared commitment to further investment, development, and innovation.

The continued improvement of data standards and utilization of a wider range of data sources in healthcare, including clinicians and wearable devices, will only improve the speed at which patient outcomes improve. Casting a wider net regarding health information will allow greater insight into quality, value of care, and even the impact of social determinants of health. However, as data collection grows and information is gathered, providing context alongside the numerical values is critical. There are situations in which patients lack the knowledge necessary to accurately judge the importance of different health information elements and assess quality of care. The proposed Health IT education included in the Draft Plan should help alleviate these concerns. HLC is an eager partner in ensuring all parties know how to properly engage with data.

Responsible Data Use

A particular multifaceted priority for HLC is the expansion and responsible use of data collected. Health data collected and used must contain and reflect information from underrepresented groups to ensure that all patients are considered as researchers and providers develop new treatments and therapies. Additionally, fostering data governance and protecting de-identified data are critical steps to ensuring patient privacy. Regardless of utility, ambiguity persists regarding non-HIPAA covered health data and third-party entities' management of health information. While the efforts included in the Draft Plan may alleviate some concerns in the absence of a national privacy standard, it is critical to advance solutions around the development, enactment, and implementation of a national privacy standard.



Integrate Health Data Systems

HLC has written extensively about the importance of health data interoperability in both the HLC-Bipartisan Policy Center Report, [*Advancing Interoperability, Information Sharing, and Data Access: Improving Health and Healthcare for Americans*](#), as well as the more recent [*Disaster Readiness and Data Interoperability Initiative*](#). However, the greatest obstacle in realizing the vision for seamless data transfer wherever patients require care remains. Many facilities have yet to implement any data services. Health systems and providers face unprecedented challenges with the proliferation of cybersecurity threats and historically low margins which may be compounded by challenges adhering to new cybersecurity measures. In most cases those facilities most in need of technological upgrades lack the resources to invest in emerging technologies that would allow them to connect to the vast network of data currently circulating. The commitment to improving this disparity is a welcome feature of the Draft Plan and one that will improve the continuity and quality of care in areas most in need.

Conclusion

HLC supports the vision, mission, and goals of the Draft Plan and looks forward to working with the administration to provide private sector input and feedback as the Draft Plan is finalized, and further implementation occurs. Thank you for the opportunity to comment; should you have any questions, please do not hesitate to contact me at (202) 449-3452 or kmahoney@hlc.org.

Sincerely,



Katie Mahoney
Executive Vice President & Chief Policy Officer

