May 28th, 2024

Micky Tripathi, PhD, MPP
National Coordinator for Health Information Technology
U.S. Department of Health & Human Services (HHS)
Office of the National Coordinator for Health Information Technology (ONC)
330 C Street, SW
Room 7033A
Washington, DC 20201

*Re: Draft 2024-2030 Federal Health IT Strategic Plan Framework*


Dear Mr. Tripathi,

On behalf of PointClickCare, we appreciate the opportunity to respond to the ONC Request for Comments on the Draft 2024-2030 Federal Health IT Strategic Plan Framework.

As an introduction, PointClickCare is the leading electronic health record (EHR) technology partner to North America's long-term post-acute care (LTPAC) and senior care industry – principally the nation's nursing homes and assisted living facilities. Additionally, Collective Medical, a PointClickCare company, is the nation's leading real-time care notification, activation, and collaboration platform, which allows different care sites (for example, a hospital, a long-term care facility, a community clinic, or others) to exchange patient health data and coordinate care for patients who touch multiple settings. Finally, Audacious Inquiry, a PointClickCare company has been engaged in the creation and implementation of interoperability standards supporting health information exchange between providers, payers and patients for more than a decade, and collaborates directly with CMS and ONC as well as through its customers on the advancement of Health IT Interoperability Standards.

The combined PointClickCare organization is the largest acute and post-acute healthcare collaboration network in North America. More than 27,000 long-term and post-acute care providers, 3,600 ambulatory clinics, 2,800 hospitals, 350 risk-bearing providers, 70 state and government agencies, and every major U.S. health plan use PointClickCare for care collaboration and value-based care delivery for millions across North America.

For comments on the Draft Federal IT Strategic Plan Framework, we would like to provide specific comments and feedback on Goals 2 and 4.

## Goal 2: Enhance the Delivery and Experience of Care

Under Goal 2, the ONC outlines Objective D which states, '*Providers experience reduced regulatory and administrative burden*'. Healthcare providers currently face significant administrative burdens due to complex documentation requirements, manual processes such as prior authorizations, and

data collection/reporting mandates. These burdens detract from patient care and contribute to inefficiencies within the healthcare system.

**To support Objective D, PointClickCare recommends:**
- **Certified EHR Technology (CEHRT) vendors should play a more proactive role in supporting providers to reduce administrative burden. They should develop features within their systems to streamline processes such as electronic prior authorizations. By integrating prior authorization results directly into CEHRT systems, providers can access information more efficiently, reducing administrative overhead and enabling them to focus more on patient care. We would strongly encourage ONC to play a supportive role in this effort, including creating more standardization in electronic prior authorization processes, requirements and protocols.**

Under Goal 2, the ONC also outlines Objective B which states, *'Expand health IT use beyond hospitals and physician offices, so that health care providers in behavioral health, long-term care and post-acute care, and home health settings use technology to access, exchange, and use EHR'* and Objective E which states, '*The health care workforce uses health IT with confidence'*. We praise the federal government for looking at ways to expand health IT use beyond hospitals and physician offices. However, within the healthcare industry, LTPAC providers in particular face significant challenges in meeting this objective. Consider the persistently underfunded adoption and use of certified electronic health record technology (CEHRT) among long-term and post-acute care (LTPAC) providers and settings, which has been well documented, including in the [2022 National Academies Report on the Quality of Care in Nursing Homes](). LTPAC providers and settings, including long-term care facilities and nursing homes, face financial constraints that hinder their ability to fully adopt and utilize CEHRT, despite the increasing demands to comply with regulations such as those related to information blocking under the 21st Century Cures Act.

**To support Objective E, PointClickCare recommends:**
- **That the ONC acknowledges the major challenges faced by the LTPAC sector in adopting certified health IT; and,**
- **That the ONC work to identify agency and Congressional means of providing additional funding, financial assistance programs, or grants specifically tailored to support LTPAC providers in adopting and maintaining CEHRT systems that would significantly mitigate the barrier they face in meeting Objective E, and Goal 2 generally.**

## Goal 4: Connect the Health System with Health Data

Under Goal 4, the ONC also outlines Objective D which states, '*Individuals electronic health information is protected, private, and secure*.' This also relates to Goal 1- Objective A, which states, '*Individuals empowered to manage their health',* in that both are focused on patient access to data. There is a critical need to advance technical standards and certification processes to adequately support the nuances of electronic health information (EHI) sharing. As states and federal mandates increasingly emphasize data segmentation and privacy, it is imperative for the healthcare industry to align its data standards and privacy measures. HIT

developers currently need to monitor and manage not just federal, but state-level standard and regulatory requirements, which is onerous and leads to unnecessary complexity, cost and delays in adherence. This alignment is essential to ensure that end-users and patients have the ability to share information selectively, in accordance with their preferences and regulatory requirements.

**To support Objective D, PointClickCare recommends:**

- **The federal government prioritize the advancement of technical standards and certification processes to support EHI sharing nuances effectively. This includes developing standards that enable granular data segmentation while maintaining robust privacy protections. By establishing clear technical standards and certification criteria, the healthcare industry can ensure interoperability across systems and facilitate secure, sharing of health information. This will allow for certified technology vendors to focus on innovation rather than reconciling different and sometimes conflicting federal and state regulatory environments.**
- **Additionally, stakeholders should collaborate closely to develop and implement standardized protocols for data segmentation and privacy management. This collaboration should involve input from healthcare providers, technology vendors, regulatory agencies, and patient advocacy groups to ensure that standards reflect diverse perspectives and address the complex challenges of EHI sharing.**
- **CEHRT vendors should be incentivized to integrate these advanced technical standards into their systems and undergo rigorous certification processes to ensure compliance. By aligning CEHRT systems with industry-wide standards for data segmentation and privacy, vendors can empower providers to share health information more securely, ultimately reducing administrative burden and enhancing patient privacy and autonomy**

Thank you for your consideration and PointClickCare welcomes any opportunity to continue to collaborate with ONC on the creation and development of national technology standards.

Sincerely,

**Steve Holt, J.D.**
Vice President, Government Affairs

615.663.8328
Steve.holt@pointclickcare.com