



May 28, 2024

Micky Tripathi, Ph.D., M.P.P.
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C St SW
Washington, DC 20201

Dear Dr. Tripathi,

On behalf of Bamboo Health, thank you for the opportunity to provide feedback on the 2024-2030 Federal Health IT Strategic Plan. We support the Office of the National Coordinator's (ONC) efforts to improve access to health data and deliver equitable and more transparent care to all.

Bamboo Health is the industry leader in supporting efficient and secure real-time access to protected health information (PHI), and analytics based on that data, directly within clinical workflows. Our suite of offerings include:

- **Controlled Substance Solutions:** Our controlled substance solutions significantly impact patient safety nationwide. Prescription drug monitoring program (PDMP) data and analytics solutions are delivered at the point-of-care to promote safe prescription practices.
- **Care Coordination:** Our Care Coordination solutions are crucial in facilitating real-time admission, discharge, and transfer (ADT) alerts – at the point-of-care. These automated care event notifications help keep disparate providers informed during pivotal moments for patients.
- **Behavioral Health:** We bridge the gap between behavioral and physical health, significantly improving access to coordinated assessment, care, and treatment. We facilitate referrals to inpatient and outpatient psych services to improve care collaboration during crisis moments.

When we bring these solutions together, we create the largest coordinated provider network in the nation. Our network continues to grow, demonstrating that building data-driven solutions with the goal of improving care and reducing cost is attainable.

Our mission aligns with ONC's Federal Health IT Strategic Plan to promote health and wellness, enhance the delivery and experience of care, accelerate research and innovation, and connect the health system with health data.

Bamboo Health
9901 Linn Station Road, Suite 500
Louisville, KY 40223



We believe market innovation and data sharing amongst Trusted Exchange Framework and Common Agreement (TEFCA) participants will support ONC's intended outcome of enhancing the whole patient experience, improving healthcare outcomes and decreasing health disparities. TEFCA's goal of nationwide interoperability is laudable. With it, ONC is signaling its focus on Fast Healthcare Interoperability Resources (FHIR) adoption to facilitate direct exchange among TEFCA participants. While Bamboo is not a Qualified Health Information Network (QHIN), we work with QHINs to support our customers as they navigate our suite of offerings. We encourage ONC to work with the stakeholder community and take a measured and deliberate approach as it expands TEFCA use cases to ensure that there are adequate market-based incentives to drive innovation and support improvements in data quality and data completeness.

We agree that common standards are a key tool to drive nationwide interoperability. Having information systems that can efficiently connect patients with their providers and help to improve care coordination is a critical component of the Federal Health IT strategy. We caution the importance of the federal government balancing interoperability and protecting intellectual property that is critical for driving and realizing innovation in the market on behalf of patients. Furthermore, among prescription monitoring programs, there are myriad, long-standing, and effective state laws and regulations governing information exchange. We caution the federal government that these various state laws may make common interoperability standards a more complex undertaking than it might otherwise be with other data types. We hope that ONC can take a measured and collaborative approach with states and stakeholders to create a workable solution that addresses the needs and realities of state policies and law with the objectives of the federal government. Using the federal government's spending and regulatory authority without adequately understanding the needs of states and territorial PDMP programs could lead to significant unintended consequences for government administrators who rely on federal funding to support their critical programs.

We also encourage the federal government to consider financial incentives to drive adoption of health IT among behavioral health providers and to facilitate policies that foster coordination of care among behavioral health providers at the community level. We would support a meaningful use program for behavioral health providers to share their health data in a coordinated effort. We believe this is especially important because there is a much lower level of both of adoption of electronic tools and data sharing as such, among behavioral health providers. These roadblocks impact public health and ONC's ability to promote data-led decision-making, a key principle of the strategic plan. We have found that adoption could be strengthened with financial incentives and would be an important first step toward fostering interoperability.

We remain steadfast in our commitment to our customers, including the federal government, state governments, payers, health systems, clinicians, pharmacies, and health information exchanges who are working to improve public health, and ultimately increase access to care and improve the



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patient experience. We applaud ONC's outcomes-driven draft plan to improve access to health data, improve the health care experience, and modernize our public health infrastructure on behalf of our nation's patients.

Bamboo Health appreciates the opportunity to submit feedback on the Federal Health IT Strategic Plan. Should you have any questions or require further information, please do not hesitate to contact Vatsala Kapur at vkapur@bamboohealth.com. We look forward to an active and engaged partnership with ONC in the coming years.

Sincerely,

Jeffrey T. Smith

Jeff Smith
CEO, Bamboo Health



Bamboo Health
9901 Linn Station Road, Suite 500
Louisville, KY 40223

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