



June 12, 2015

Karen DeSalvo, MD  
National Coordinator for Health Information Technology  
Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, DC 20201

Dear Dr. DeSalvo:

The Health IT Policy Committee (HITPC) gave the following charge to the Strategy and Innovation and the Consumer Workgroups:

- Develop recommendations to the HITPC on the Federal Health IT Strategic Plan 2015-2020
- Develop recommended topics, issues, or gaps identified in the Federal Health IT Strategic Plan recommendations, to be addressed in the HITPC 2015 Work Plan
- Make high-level and specific comments on goals, objectives and strategies

## **Background**

The Strategy and Innovation Workgroup and the Consumer Workgroup presented draft comments on the Federal Health IT Strategic Plan (Strategic Plan) at the February 10, 2015 HITPC meeting. The workgroups then collaborated to identify consensus across both groups and shared joint comments that were approved by the HITPC at the March 10, 2015 meeting. Topics of joint comments include the following:

- *Revise Plan Framework and Key Themes*
- *Provide Clarity and Accountability*
- *Clarify Federal Role in New Health Improvement Framework*
- *Health IT Infrastructure Activities*
- *Identified Gaps and Areas for Emphasis*

Each of two workgroups also submitted comments specific to the separate workgroup discussions which are summarized following the joint recommendations below and in detail in the attached appendix.

## **Joint Comments**

Overall, both workgroups suggest that the Strategic Plan needs to better align its goals, objectives, and strategies with its vision and principles of improved health and collaboration. Additional details regarding this can be found in the attached appendix.

### *Revise Plan Framework and Key Themes*

- The Strategic Plan should be more of a Health Improvement Plan, rather than emphasizing data in a “Collect, Share, Use” framework.
  - The plan should emphasize the desired end state: the widespread, effective use of digitized information to support improved health of individuals and communities, health care, and person-centered health and wellness.
  - Emphasize that the desired end-state is improved health of individuals and communities using health information technology
  - More clearly align with other national health planning activities.
  - Leverage health IT so individuals, purchasers, payers, providers, community-based organizations can partner together to identify, align to, and achieve patient goals.
- Each workgroup proposed separate potential methods for the Strategic Plan to reinforce its focus on improved health, and recommended using existing content in a reorganized way
  - Strategy and Innovation Workgroup:
    - Use current Plan’s Goal 4: Advance the Well-Being of Individuals and Communities as the organizing principle to revise the final Plan
    - Provide clear guidance on a broader privacy framework
  - Consumer Workgroup:
    - Integrate consumers/individuals into each goal area
    - Create a new “bridge goal” to focus on shared partnership between individuals, providers, and communities

### *Provide Clarity and Accountability*

- The Plan’s federal actions and strategies should use unambiguous language to describe how the goals will be achieved.
  - Add definitions to terms used in the Strategic Plan to avoid vagueness and misinterpretation.
  - Provide regular, transparent reporting on progress toward health improvement goals.
  - Use transparency to hold stakeholders and partners publicly accountable.
  - Ensure stakeholders can monitor this progress and provide input.

### *Clarify Federal Role in New Health Improvement Framework*

- The Plan should show how the federal government will help support the nation to build and design a new health infrastructure that is person-centered
  - Emphasize opportunity for federal leadership through its payment and recognition programs, aligning payment and purchasing models to use data to improve health
  - Encourage federal role in defining important health outcomes and directing HIT to help achieve those outcomes as opposed to defining functional requirements
  - Work with private sector to identify government data sources that support innovation and improvement in public health goals
  - The Federal government should set pathways and guardrails to promote industry’s ability to achieve goals, leaving room for innovation

### *Health IT Infrastructure Activities*

- Strategic Plan activities should support a health IT infrastructure that enables progress in the following areas:

- Establish a more dynamic, interactive learning health system
- Use health IT to increase health equity and reduce disparities, for both consumers and providers
- Improve patient/family caregiver experience, as well as improve empowerment and engagement through elevating the role/voice of consumer participation in all areas of health care, research, and innovation
- Use multiple traditional and non-traditional data and information sources to support and promote a diverse care delivery environment

### *Identified Gaps and Areas for Emphasis*

Each workgroup included specific recommendations on strategies, challenges, and potential activities for the federal government to pursue. The following list provides some of these recommendations (please refer to individual workgroup recommendations attached for details).

The updated Strategic Plan should include strategies to:

- Address health and health IT disparities to achieve better equity
- Include training and other methods to improve health and health IT literacy
- Improve usability and design for individuals, caregivers, and families, as well as providers, and allow for information to be aggregated easily from multiple sources (this will reduce portal fatigue and enable users to build a longitudinal health record)
- Accelerate development of health IT functions that identify and support family caregivers
- Integrate public health and social determinants of health into the health IT ecosystem and into health improvement efforts
- Better connect providers, patients, and families to community resources
- Provide guidance to protect privacy for use of technologies and devices not covered under HIPAA
- Provide clear guidance on how providers and others should manage sensitive information
- Demonstrate how mobile access will be improved
- Move toward systems for measuring and improving clinically and personally-relevant outcomes
- Evaluate and harmonize federal and state policies that impede research and innovation

### **Additional Reframing Comments**

#### *Strategy and Innovation Workgroup*

- Anchor Strategic Plan around overarching health improvement goals.  
For example, promote interoperability by emphasizing the opportunity for health improvement. This will make it easier for the public and federal agencies to understand how to come together to act on health improvement goals.
- Re-organizing Principles
  - Improve the Health and Well-Being of Individuals and Communities
    - *Aim 1:* Align health IT goals with public health goals and targets
    - *Aim 2:* Identify relevant federal information and data sources important to achieving national health goals
    - *Aim 3:* Make relevant information usable to people and organizations that impact health
    - *Aim 4:* Develop public policies that facilitate safe acquisition, and sharing and use, of health data

- *Federal partners can do this by building flexibility into programs that expect and accommodate innovation*
  - Federal efforts should focus on sharing information that helps achieve a defined set of health outcomes
  - Federal programs should be better designed to recognize that health improvement increasingly involves a broad range of clinical/nonclinical actors, all needing access to some of the person's health-related information

*Consumer Workgroup*

- Establish a new bridge goal
  - Building a culture of individual, provider, and community partnership to achieve shared person-centered health and health care goals.
  - Leveraging health IT so that individuals, providers, community-based organizations and other patient supports will partner together to ID, align to and achieve health and care goals.
  - Aligning around shared, person-centered goals for health and care will help the federal government and all health care stakeholders to align efforts in patient engagement, quality measurement, reporting, and payment.
  - Health system will be incentivized to continuously and collaboratively work with individuals to document, measure, refine, communicate and achieve objectives that are both meaningful to patients and achievable by the delivery system.
  - This would be an Umbrella goal for more tactical areas such as care planning, shared decision making, patient-generated health data, health literacy and communication, and much more.

The Health IT Policy Committee adopted these recommendations at the March 10, 2015 meeting. We appreciate the opportunity to provide these recommendations and look forward to discussing next steps.

Sincerely yours,

/s/

Paul Tang  
Vice Chair, Health IT Policy Committee