

January 28, 2019

Donald W. Rucker, MD
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, Floor 7
Washington, DC 20201

RE: Strategy on Reducing Regulatory and Administrative Burden Relating to the Use of Health IT and EHRs

Submitted electronically via <https://www.healthit.gov/topic/usability-and-provider-burden/strategy-reducing-burden-relating-use-health-it-and-ehrs>

Dear Dr. Rucker,

UnityPoint Health (“UPH”) appreciates this opportunity to provide feedback on the proposed strategy. UPH is one of the nation’s most integrated healthcare systems. Through more than 30,000 employees and our relationships with more than 290 physician clinics, 38 hospitals in metropolitan and rural communities and 15 home health agencies throughout our 9 regions, UPH provides care throughout Iowa, central Illinois and southern Wisconsin. On an annual basis, UPH hospitals, clinics and home health provide a full range of coordinated care to patients and families through more than 6.2 million patient visits.

UPH appreciates the time and effort of the Office of the National Coordinator for Health Information Technology (ONC) in developing and proposing this strategy and respectfully offers the following comments.

GENERAL COMMENTS

UnityPoint Health has reviewed the overall strategy and agrees with the four identified areas targeted as issues/challenges – clinical documentation; health IT usability and the user experience; EHR reporting; and public health reporting. **We also believe that the broad strategies and aligned recommendations under each issue are directionally correct** and, in this letter, we have provided additional thoughts on each area. We would note that because both strategies and recommendations lack sufficient detail to