The Honorable Micky Tripathi
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology (ONC)
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Submitted electronically via https://inquiry.healthit.gov/

RE: Draft 2024-2030 Federal Health IT Strategic Plan

Aligning for Health (AFH) is an advocacy organization that brings together a broad coalition of members, including payers, providers, hospitals, community care hubs, and health information management companies, focused on improving health and wellbeing through efforts to address both health and social needs.[1] As a coalition, we work to develop and promote actionable policies that create opportunities and remove barriers for states and local governments, health care organizations, and non-healthcare organizations to work together to develop cross-sector, coordinated solutions to address both health and social needs.

There is a significant body of academic work showing that economic and social conditions have a powerful impact on individual and population health outcomes. These non-clinical factors – such as housing, food assistance, income, employment status, education, and transportation – have the potential to contribute to health outcomes more than clinical health care. In fact, one widely cited study found that while ten percent of premature deaths in the U.S. are due to clinical health care, social and environmental factors are estimated to account for sixty percent of health outcomes.[2] Additionally, AFH strongly believes that use of health information technology (health IT) tools and sharing of data can help to address social determinants of health (SDOH) by facilitating access to healthcare services and whole person care, enabling better health outcomes through improved communication, and consistent SDOH data collection.

We support the many steps that ONC has taken to prioritize addressing health equity and SDOH. Thank you for the opportunity to provide comments on the Draft 2024-2030 Federal Health IT Strategic Plan. We are providing comments on the proposal related to the following goals: promote health and wellness, enhance delivery and experience of care, accelerate research and innovation, and connect the health systems with health data. We appreciate the effort ONC has taken to incorporate social determinants of health and health equity into their draft plan, ensuring the goals and anticipated outcomes are equitable and effective for all people and populations.

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AFH applauds ONC's commitment to leveraging health IT strategies that address electronic health information (EHI) access, exchange, and use that improves health equity and whole person care delivery through the connection of human services data. We appreciate ONC's inclusion of health equity in the four goals of promoting health and wellness, enhancing the delivery and experience of care, accelerating

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[1] https://aligningforhealth.org
[2] Hood, C. M., K. P. Gennuso, G. R. Swain, and B. B. Catlin. (2016). County health rankings: Relationships between determinant factors and health outcomes. American Journal of Preventive Medicine 50(2):129-135.

research and innovation, and connecting the health systems with health data. Overall, we encourage ONC to continue to work closely with private organizations like payers, hospitals, health information management companies, community-based organizations (CBOs), and others to collect strategies and best practices in support of each of these goals.

Access to Broadband and Devices to Bridge the Digital Divide

To empower individuals and families to manage their health, it is critically important that ONC and other partner agencies internal and external to the Department of Health and Human Services (HHS) pursue policies and strategies that encourage uptake and availability of health IT among individuals and households. According to the Federal Communications Commission (FCC), the digital divide still impacts 5.6% of American households, with many who are unable to access affordable broadband without the assistance of internet connectivity programs.[3] ConnectHomeUSA is an example of a program that narrows the digital divide for families with school-age children living in HUD-assisted housing by providing affordable in-home internet service, devices, and training. Additionally, the FCC's Emergency Broadband Benefit (EBB) Program provided temporary discounts on broadband internet services and devices during the COVID-19 pandemic. Programs like these are an incredibly important means of expanding access to health IT for individuals and families. Furthermore, programs like the FCC's Lifeline Program for Low-Income Consumers offer discounted or subsidized devices and phone service to eligible individuals and households, thereby allowing health plans, providers, case managers, and state agencies to contact patients and enabling patients to communicate with care teams and access health information, records, and treatment plans. We strongly advocate for ONC and partner agencies to continue to increase awareness of the availability of these programs and disseminate best practices on how clinical and non-clinical organizations might leverage these programs to empower individuals and families in their care and improve health outcomes.

By continuing to incentivize health IT adoption in underserved areas through programs that provide grants or developing resources to encourage awareness, ONC and other agency partners can continue to encourage healthcare providers in these regions to adopt advanced health IT solutions. This could include adoption and consistent use of secure electronic health record (EHR) systems, telehealth platforms, closed-loop referral systems, and data analytics tools to identify health-related social needs (HRSNs) and address disparities in healthcare delivery. We also encourage ONC and partner agencies to continue developing guidance and resources to promote health literacy and digital health literacy among underserved populations in culturally competent and linguistically accessible ways.

Enhancing Access to Telehealth Services

Once equipped with devices, broadband, and digital health literacy, individuals and families can also access care in multiple modalities, including through telehealth services. Expanding access to telehealth services and remote monitoring technologies in underserved communities is crucial for overcoming geographical barriers to care, ensuring individuals in rural or remote areas receive timely and effective

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[3] Federal Communications Commission. (2020). *Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund* (FCC 20-50). Retrieved from
https://docs.fcc.gov/public/attachments/FCC-20-50A1.pdf

medical attention. This not only enhances health outcomes by providing consistent and immediate access to healthcare professionals but also reduces the need for travel, saving time and resources for both patients and providers. However, we know that providers in rural communities utilize telehealth services at lower rates than their urban and suburban counterparts.[4] As ONC considers strategies to expand use of secure telehealth services, we encourage special consideration for strategies that will improve trust in telehealth services among rural communities as well as the development of resources that will encourage the adoption of telehealth modalities by providers living in rural and frontier communities.

Integrating Community-Based Organizations in the Design of Health IT Policies and Programs

There is a critical need to address the lack of infrastructure available to organizations who engage underserved communities across health and human services domains, including CBOs and community care hubs (CCHs). Although adoption of health IT has increased tremendously by healthcare providers over the years, CBOs and other non-clinical organizations have not experienced a similar level of health IT adoption which undermines the ability of our systems to collect and share critically important information around SDOH and HRSN needs. Although this stems in part from access to financial resources and capacity to adopt health IT platforms, it also stems from a lack of engagement of CBOs, CCHs, and non-clinical organizations in the development of use cases, workflows, and strategies to enhance uptake of technology.

Guidance and resources are needed to encourage health IT companies to engage in co-designing with providers, patients, CBOs, payers and others to ensure platforms and systems are designed with all users and use cases in mind. Additionally, training resources for non-clinical organizations and actors, such as community health workers (CHWs), are needed to maximize digital health competency, uptake of health IT tools, and engagement in secure transfers of SDOH data. The ONC strategy proposal presents an opportunity for ONC to continue collaborating with private organizations to identify and share best practices, including working with payers, providers, CBOs, and other groups to understand their approaches to developing infrastructure in various geographies and strategies for engaging underrepresented populations in interventions.

Encouraging Consistent SDOH Data Collection

Collection of SDOH and HRSN data through tools like the Accountable Health Communities Health-Related Social Needs Screening Tool and other screening tools is inconsistent and underutilized in certain healthcare settings.[5] In order to target interventions in a data-informed manner and to fuel evaluations of the impact of such interventions on target populations, it is incredibly important that ONC and partner agencies continue to encourage the collection of standardized SDOH data during healthcare encounters and interactions with CBOs and social services agencies. Partnerships with public and private organizations through conveners like the Gravity Project have fostered the development of terminology and pilots that provided a wealth of knowledge around standardized definitions and approaches to collecting SDOH and HRSNs. We encourage ONC and partner agencies to continue this work and support collaborations between state and federal governments, payers, providers, CBOs, and more. We also

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[4] Chen, J., Amaize, A., and Barath, D. (2021). Evaluating Telehealth Adoption and Related Barriers Among Hospitals Located in Rural and Urban Areas. Journal of Rural Health; 37(4): 801-811.

[5] Lindenfeld, Z., Chen, K., Kapur, S., and Chang, J. (2023). Assessing Differences in Social Determinants of Health Screening Rates in a Large, Urban Safety-Net Health System. Journal of Primary Care Community Health 2023;14. Retrieved from https://journals.sagepub.com/doi/10.1177/21501319231207713.

underscore the importance of ONC and partner agencies in developing training resources and implementing programs that contribute to capacity-building for healthcare providers and CBO staff on the collection, documentation, and utilization of this data.

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At Aligning for Health, we believe that to best serve individuals and families' whole person needs and empower them in their healthcare, our healthcare system needs to encourage both clinical and non-clinical organizations to more widely adopt health IT tools and consistently screen to improve SDOH data collection in all programs. We applaud ONC's draft 2024 – 2030 Health IT Proposal and the emphasis on goals, objectives, and strategies to improve outcomes for individuals, populations, and communities, while promoting health equity and modernizing our nation's health IT infrastructure.

We appreciate the opportunity to provide commentary on this important issue and look forward to the opportunity to participate in further discussions or to provide comments on related policies. For further information about Aligning for Health's comments, please contact Ashley Gray, Executive Director, at agray@aligningforhealth.org.

Thank you,

Ashley Gray

Ashley Gray
Executive Director, Aligning for Health