HIMSS

May 28, 2024
Micky Tripathi, Ph.D., M.P.P.
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
Washington, DC 20416

Dear Dr. Tripathi:

On behalf of the Healthcare Information and Management Systems Society (HIMSS), we are pleased to provide public comments on the Draft 2024-2030 Federal Health IT Strategic Plan. HIMSS is a global advisor and thought leader and member-based society committed to reforming the global health ecosystem through the power of information and technology. As a mission-driven non-profit, HIMSS offers a unique depth and breadth of expertise in health innovation, public policy, workforce development, research, and analytics to advise global leaders, stakeholders, and influencers on best practices in health information and technology driven by health equity. Through our innovation engine, HIMSS delivers key insights, education and engaging events to healthcare providers, governments, and market suppliers, ensuring they have the right information at the point of decision. HIMSS serves the global health information and technology communities with focused operations across North America, Europe, the United Kingdom, the Middle East, and Asia Pacific. Our members include more than 125,000 individuals, 480 provider organizations, 470 non-profit partners, and 650 health services organizations. Our global headquarters is in Rotterdam, The Netherlands and our Americas headquarters is in Chicago, Illinois.

HIMSS applauds the efforts of the Office of the National Coordinator for Health Information Technology (ONC), via its Strategic Plan, to enhance individual and community health through improved healthcare experiences, advanced research and innovation, and integrated health data systems. HIMSS fully supports the federal government's role in advancing health equity by design, and welcomes the opportunity to leverage our membership to support ONC in achieving these goals in a manner that helps realize the health potential of every human, everywhere.

Promote Health and Wellness: Improve individual access to usable health information

Seamless, secure, and ubiquitous data access and interoperable health information exchange should ensure the right people have the right access to the right health information in a usable format at the right time. Interoperable health information exchange is critical to aiding clinicians make informed decisions, ensuring patients have access to their health data, and accelerate technology advancements to ensure effective public health response to future crises.

HIMSS supports the ONC's goal to enhance care delivery through improved interoperability and the adoption of national standards such as HL7 FHIR. We have long advocated for streamlining health information sharing and reducing compliance burdens, thereby enabling more effective and efficient health IT solutions across care settings.

HIMSS supports the continued development Trusted Exchange Framework and Common Agreement (TEFCA), to accelerate the adoption, success, and expansion of a trusted exchange framework. As part of that process, aligning other data-sharing networks with TEFCA would greatly mitigate burden and improve vital health data access. HIMSS also encourages ONC to focus on driving state, local, and territorial public health agencies to sign on as TEFCA participants to facilitate public health data reporting.

Striking the right balance between healthcare consumer expectations and market supplier and healthcare system capabilities is important to successful advancements in

digital health transformation. Economic pressures and rapidly changing compliance requirements have put tremendous strain on hospitals and providers. HIMSS strongly recommends ONC explore adopting a standardized compliance timeline (a minimum of 18 months following publication of a final requirement codified in rulemaking) for the adoption of new standards and certification requirements by eligible hospitals and eligible providers.

HIMSS also calls on ONC to weigh the impact on healthcare sectors that are vital components to interoperability yet are poorly positioned to take on additional cost and regulatory burden to become part of a fully interoperable healthcare ecosystem. These sites including behavioral health, long-term post-acute care, public health agencies, and organizations that address health-related social needs. Future iterations of the ONC strategic plan should focus on getting resources in place to ensure organizations that were not included in HITECH funding are fully incorporated into a nation-wide interoperable care delivery ecosystem.

Advance healthy and safe practices through health IT and promote safe and high quality care

The deployment of health information and technology at the point of care should do no harm and support the provider in delivering the appropriate care to the right patient at the right time. The availability of data creates a world where providers have tools to improve adherence to the current standard of care, as well as insights at their fingertips to turn the data into actionable information that will improve the standard of care and patient outcomes. A continuous feedback loop of data and easily visualized insights are the fuel needed for a collaborative and innovative learning environment.

HIMSS supports ONC's goal to strengthen feedback loops between scientific, public health, and healthcare communities to efficiently translate evidence into clinical practice and improvement. Ensuring that technology facilitates meaningful and actionable quality measurement data that isn't overly burdensome to support is vital to supporting nimble quality improvement in care delivery settings. To support this work, HIMSS recommends ONC develop a roadmap for adoption of USCDI+, particularly the USDCI+ Quality Domain. Current USCDI clinical language definitions are not nuanced enough to support the transition to digital quality measurement (dQMs). dQMs are the potential solution to the long feedback loop lag currently associated with clinical quality measure reporting.

HIMSS also supports ONC's goal of enhancing use of personal connected health and virtual care to help patients adhere to care plans and effectively monitor progression of disease. HIMSS continues to encourage the federal government to fully reimburse for telehealth and personal connected health services and supports federal government investment in ubiquitous broadband technologies to ensure communities have access to healthcare, and community services that utilize remote patient monitoring, telehealth, and other connected care services.

Integrate Health and Human Services Information

HIMSS supports the integration and utilization of social determinants of health data into EHRs and decision support interventions to inform care delivery. The HIMSS Davies Award program has demonstrated several use cases where SDOH data elements refined clinical best practices to significantly improve care outcomes, particularly associated with congestive heart failure and other chronic disease states. SDOH data also drives interventions targeting high utilization patients, keeping patients out of emergency departments, focusing on getting the patients more effective interventions, and reducing costs.
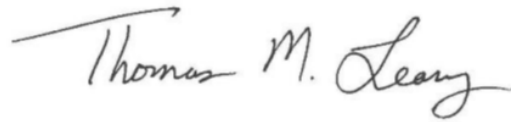
Data collection isn't enough. SDOH and health related social needs data (HRSNs) must be parsable to provide insights into specific high priority local challenges. Reimbursement models should reward clinicians for ensuring patients get referrals to community services that may mitigate HRSNs.

Providers of vital community services targeting HRSNs rarely have the information technology infrastructure to participate in the ubiquitous exchange of health data required to ensure that providers referring patients to community services can close the loop. HIMSS applauds ONC's practices for incorporating stakeholders into collaborative efforts to address healthcare challenges and encourages ONC to engage community service organizations on how to incorporate them into interoperable health data exchange.

Finally, HIMSS remains supportive of ONC's goal to leverage currently existing IT infrastructure to support better care in Tribal health settings. When tribal patients have referrals out to specialists, patient data is often not connected electronically. In many instances, faxing and paper charts are still used for patient care, and the inefficiencies of these modalities contribute to lower care coordination because data is not available at the point of care. Tribes also have cultural sensitivities which much be considered as part of the exchange of digital health information. HIMSS has a growing [Native American and Indigenous Peoples Community](#) and would welcome the opportunity to engage ONC with the community's membership to foster a dialogue to improve overall conditions, and provider and healthcare system understand of their needs.

We look forward to discussing these issues in more depth. Please feel free to contact Jonathan French, Senior Director of Public Policy and Content Development, at Jonathan.French@HIMSS.org and Michael Kroll, Senior Informatics and Operations Manager Michael.Kroll@himss.org with questions or to request more information.

Sincerely,

Thomas M. Leary, MA, CAE, FHIMSS
Senior Vice President and Head of Government Relations