

May 22, 2024

National Coordinator Micky Tripathi
Office of the National Coordinator for Health Information Technology (ONC)
U.S. Department of Health and Human Services
330 C Street SW, 7th Floor
Washington, D.C. 20201
Re: 2024-2030 Federal Health IT Strategic Plan Public Comment

Dear Coordinator Tripathi,

On behalf of the Alliance for Person-Centered Care, we want to thank you for providing the opportunity to comment on the 2024-2030 Federal Health IT Strategic Plan, which will provide the foundation for future regulations and initiatives initiated by ONC.

The Alliance for Person-Centered Care is a multi-sector group of stakeholders with a common interest in facilitating the use of performance measures based on patient-reported data in clinical care and quality programs. We see such effective use of patient reported data as a necessary component for achieving a health care system that is grounded in person-centered care.

We appreciate ONC's inclusion of "Person-centered, inclusive design" in the Federal Health IT Principles as well as the emphasis on equity throughout the Strategic Plan. Our priorities are well-aligned with the four overall goals of the Strategic Plan, particularly Goal 2: Enhance the Delivery and Experience of Care.

As ONC advances its thinking and works to finalize the Strategic Plan, the capture and effective use of patient-reported data should be a key consideration in your activities.

Patient-reported data are surveys or questions that ask people about their beliefs, preferences, experiences, symptoms, functioning or other topics, without interpretation of their response by a clinician or anyone else.*

Such data help patients work with their clinical teams to build and manage care plans that focus on what matters to them and their families.

Incorporating patient-reported data into the Strategic Plan—as well its activities broadly—will reflect the strategic priorities of other HHS agencies. For example, CMS has set a goal that at least 25 percent of the measures or scores in their quality programs are based on measures that incorporate patient-reported outcome measures (PROMs).ⁱ In addition, CMMI's recently announced Quality Pathway is organized, in part, around advancing the use of patient-reported measures.ⁱⁱ

We see patient-reported data as essential to many elements of the Strategic Plan and encourage ONC to specify how it contributes to the Plan's goals and objectives.

For example, we encourage ONC to incorporate patient-reported data as a strategy within:

* We prefer the broader term "patient-reported data" to the narrower term "patient-reported outcomes", as data reported by patients can include information other than outcomes.

Goal 2, Objective B: Patients experience expanded access to quality care and reduced or eliminated health disparities.

Such a strategy could follow a similar structure to the objective's existing strategy on social determinants of health data and would communicate to stakeholders that patient-reported data is a key component of achieving that objective.

Again, we appreciate your consideration of our comments. Please do not hesitate in contacting me at Sarah.Scholle@LeavittPartners.com if you have any questions.

Sarah Hudson Scholle, MPH, DrPH

Leavitt Partners

On behalf of the members of the Alliance for Person-Centered Care, including the following:

American Psychological Association

Camden Coalition

David White, Patient Advocate

Desiree Bradley, Patient Advocate

Dialysis Clinic, Inc.

Healing Works Foundation

HealthLinc

Institute for Exceptional Care

Johnson & Johnson

The Larry A. Green Center

Mark Friedberg, SVP, Performance Measurement & Improvement, Blue Cross Blue Shield of Massachusetts

National Committee for Quality Assurance

National Partnership for Women & Families

National Patient Advocate Foundation

Phreesia

ⁱ <https://www.cms.gov/files/document/cms-national-quality-strategy-handout.pdf>

ⁱⁱ

https://catalyst.nejm.org/doi/full/10.1056/CAT.24.0132?query=CON&cid=DM2334509_Catalyst_Non_Subscriber&bid=-2096294882