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Micky Tripathi, PhD, MPP
Office of the National Coordinator for Health Information Technology (ONC-HIT)
U.S. Department of Health and Human Services
330 C Street SW, 7th Floor
Washington, DC 20201

RE: ONC Draft 2024-2030 Federal Health IT Strategic Plan

Dear Dr. Tripathi:

The American Psychiatric Association (APA), the national medical specialty society representing over 38,900 psychiatric physicians and their patients, appreciates the opportunity to comment on the Draft 2024-2030 Federal Health IT Strategic Plan. APA applauds ONC's approach in building on prior success yet focusing on future goals and strategies that encompass health equity, Artificial Intelligence (AI), and public health broadly.

To help achieve the goals outlined, APA suggests ONC provide clear governance models and informed consent mechanisms to guide providers, and which are essential for secure data exchange. Data privacy, including informed consent, needs to be considered given the need for increased integration of rural healthcare facilities, variability of existing IT systems and ever-changing digital health landscape.

APA suggests that:

- **To protect patients' online mental health data and safety, data privacy and patient protection frameworks need to be updated frequently with the involvement of pertinent stakeholders.**
- **Data privacy standards should apply to any platform that hosts sensitive health-related data, particularly related to mental health and substance use. If HIPAA standards are not met, a clear statement must be made — in plain, brief, and prominent language actively accepted by the user that the consumer does not have an expectation of privacy while using the app.**
- **Treatment-focused apps must adopt high standards of evidence-based practice and can function as a supplement to mental health care but are not a substitute for care delivered by a licensed mental health clinician for clinically significant mental illness.**

Integrating behavioral health data with primary care and addressing this integration gap is also crucial for seamless data exchange and holistic patient care. A pathway towards this is the standardization of Social Determinants of Health (SDOH) data. This could facilitate secure data exchange between mental healthcare apps, wearables and other health IT systems, including electronic health records (EHRs). Addressing this gap means it is also

critical for use of telemedicine, including video conferencing and audio-only care, to become an essential strategy to improve health equity and increase access to high-quality care.

In addition, there are areas which currently are not detailed in the strategic plan. For instance, APA urges ONC to include asynchronous care in its strategic plan ensuring reimbursement for mental healthcare services for those with serious mental health issues and those with disabilities. Moreover, data components from the homeless management information system (or integration of) should be considered. ONC should keep in mind the existence of digital literacy gap especially within marginalized groups and APA encourages ONC to develop funding and technical assistance mechanisms to reduce the disparity for patients/consumers as well as physicians.

Additionally, APA urges ONC to consider smaller and rural behavioral health organizations who may face resource limitations in adopting and maintaining health IT solutions as ONC implements its plan in the coming years. We recommend that ONC provide technical assistance to smaller, uncertified, behavioral health-specific health IT firms in achieving interoperability objectives. Funding for research and investment in systems would also help in achieving the goals of interoperability and standardization. As it stands, current grants are short term, and the development of health IT is different from other grants and those differences should be considered.

Thank you for your review and consideration of these comments. If you have any questions or would like to discuss any of these comments further, please contact Zuhail Haidari (zhaidari@psych.org), Deputy Director, Digital Health.

Sincerely,

A handwritten signature in blue ink that reads "Saul Levin" with "MD, MPA" written in smaller letters to the right.

Description automatically generated
Saul Levin, MD, MPA, FRCP-E, FRCPsych
CEO & Medical Director
American Psychiatric Association