AMERICAN ACADEMY OF NURSING
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April 3, 2020

Donald Rucker, MD
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
United States Department of Health and Human Services
330 C Street, SW
Floor 7
Washington, DC 20201

RE: 2020-2025 Federal Health IT Strategic Plan

Dear Dr. Rucker:

The American Academy of Nursing (Academy) is pleased to offer the following comments in response to the January 15, 2020 request for additional input and recommendations regarding the draft 2020-2025 Federal Health Information Technology (Health IT) Strategic Plan for the Office of the National Coordinator for Health Information Technology (ONC). The Academy serves the public by advancing health policy through the generation, synthesis, and dissemination of nursing knowledge. Academy Fellows are inducted into the organization for their extraordinary contributions to improve health locally and globally. With more than 2,800 Fellows, the Academy represents nursing's most accomplished leaders in policy, research, administration, practice, and academia.

The Academy acknowledges and is appreciative of the ONC's commitment to outcomes-driven goals and focusing on strategies that use health IT has a catalyst. As the world around us is changing and technologies are advancing, the Academy believes it is crucial that the government invest time and financial resources into advancing health technologies to improve health and well-being especially in our most vulnerable populations. Our comments will focus on the following goals from the draft 2020-2025 Federal Health IT Strategic Plan:

- Promote Health and Wellness;
- Enhance the Delivery and Experience of Care; and
- Connect Healthcare and Health Data through an Interoperable Health IT Infrastructure.

Goal 1 – Promote Health and Wellness
The Academy is pleased to see that one of the goals of the draft Health IT Strategic Plan is to promote health and wellness. In fact, one of the Academy's policy priorities for 2020 is to advance health equity and champion wellness. As the draft strategic plan states, "Health IT should be used to empower individuals, address patients' full range of health needs, promote healthy behaviors, and facilitate the improvement of health for individuals, families, and communities.[1] Therefore, the Academy recommends the phrase "improve health equity" be included in Goal 1 as this is an issue the U.S. Department of Health and Human Services is utilizing for the Healthy People 2030 guidelines which are currently in development. Emphasis on health equity within Healthy People 2030 marks a critical shift away from focusing on disease outcomes, which are often attributed to individual behaviors. The

draft Health IT Strategic Plan also moves away from disease outcomes to improving health and wellness. As the strategic plan mirrors the thinking of Healthy People 2030, we suggest Goal 1 be revised to read "Promote Health and Wellness and Improve Health Equity." This change will emphasize and highlight that access to care and health IT is not equal throughout the country and the ONC sees it as a goal to close the disparity gap.

Over the past 20 years, an increasingly robust evidence base has documented that the physical, social, and economic circumstances in which people live, work, play, and learn affect their health and well-being.[2] The Academy suggests the Health IT Strategic Plan focus on the social, economic, and environmental factors to prevent disease and to maintain, or obtain health and well-being. The Academy believes that the strategic plan should outline the need for better understanding of how health IT can be used to promote health and well-being. Emphasis should be placed on disease prevention and promoting healthy lifestyles instead of solely focusing on treatment and cures, the latter of which our current health care system is modeled after. Following the passage of the 21st Century Cures Act, Pub. L. No. 114–255, in 2016, precision health has been widely expected to change the face of health care, allowing for personalized care based on each individual's genomic information. In order for this goal to become reality, the health care infrastructure should support the collection and interpretation of health information in conjunction with an individual's social and lifestyle data, biological factors, behaviors and, environmental context.[3]

As stated in the draft of the Federal Health IT Strategic Plan, access to technology remains a challenge in the U.S. and disparities in access to Health IT continue to persist. This is an area where more information is needed on access to the internet and how it is a social determinant of health.[4] The Academy believes that to truly improve health and well-being, policies must expand access to quality care through innovative approaches, such as health IT, in order to improve health equity. A Pew Research Center report found that a growing number of Americans are using their smartphone as their primary device to access the internet, with the largest groups being non-white with lower education and income levels.[5] The Pew report also noted that more than half of all smartphone owners used their devices to access health information. Additionally, the Pew report found that 15% of Americans own a smartphone but say that they have a limited number of ways to get online other than their cell phone.[6] This could be problematic in rural and underserved areas where high-speed internet is limited for both patients as well as their health care providers.

The Federal Health IT Strategic Plan also outlines the importance of enabling patients to be able to easily access their own health information With that said, a research team found that access to the inpatient portal did not improve patient activation. However, patients who had access to an inpatient portal had a lower 30-day re-admission rate and were more likely to look up information online.[7] The Academy recommends that ONC continue to explore the on-the-ground application to make Goal 1 in the draft strategic plan a reality.

Goal 2 – Enhance the Delivery and Experience of Care
The Health IT Strategic Plan also highlights the importance of delivering high-quality, patient-centered care. The Academy recommends the ONC include a definition of patient-centered care in the Health IT Strategic Plan as well as provide examples in order for stakeholders to further realize the goal. Also, it is important to include patient-reported outcomes and patient-generated health data in the draft Health IT Strategic Plan, to enhance understanding of patient experiences and data needs.

Additionally, we applaud the inclusion of the strategy to expand care beyond the traditional clinical setting by expanding access to remote monitoring, telehealth, and other mobile and health IT

services.[8] As you can see from the COVID-19 pandemic, social distancing is a critical component and is essential to further prevent the spread of this pandemic. The Administration's decision to further promote telehealth during the pandemic gives maximum flexibility to the healthcare system.[9] Additionally, these temporary telehealth changes only cover the use of devices with audio and video. This creates a health equity concern as many patients and providers may not have access to devices with video chat, internet service, or broadband speed[10] and we encourage this health equity challenge to also be considered as the draft Health IT Strategic Plan is finalized. The promotion and expansion of health IT as well as infrastructure investments after the pandemic passes will be crucial to ensuring everyone regardless of location or background continues to receive high quality care.

Goal 4 – Connect Healthcare and Health Data through an Interoperable Health IT Infrastructure
As innovations in health IT increase, we strongly encourage the ONC to ensure that health IT systems and processes are developed in conjunction with key stakeholders including individuals, caregivers and healthcare providers. Additionally, we applaud the plan's intent to improve interoperability by increasing the seamless flow of health information; reducing burden on patients, caregivers, and healthcare providers; and fostering innovation by unleashing data for researchers and innovators.

Thank you for the opportunity to provide our comments and recommendations regarding the 2020-2025 Federal Health IT Strategic Plan. I hope you will contact us for assistance in any efforts to address these issues or policies. If you have any questions or need additional information, please feel free to contact the Academy's Senior Director of Policy, Christine Murphy, at cmurphy@aannet.org or 202-777-1170.

Sincerely,

Eileen Sullivan-Marx, PhD, RN, FAAN
President

[1] Office of the National Coordinator for Health Information Technology. (2020). *2020-2025 Federal Health IT Strategic Plan*. Washington, DC: U.S. Department of Health and Human Services.

[2] U.S. Department of Health and Human Services. (2018). *Secretary's Advisory Committee for Healthy People 2030: Issue Briefs to inform Development and Implementation of Healthy People 2030*.

[3] Starkweather, A. R., Coleman, B., Barcelona de Mendoza, V., Hickey, K. T., Menzies, V., Fu, M. R., … Harper, E. (2018). Strengthen federal and local policies to advance precision health implementation and nurses' impact on healthcare quality and safety. *Nursing Outlook, 66*(4), 401–406. https://doi.org/10.1016/j.outlook.2018.06.001

[4] Veinot, T. C., Ancker, J. S., & Bakken, S. (2019). Health informatics and health equity: improving our reach and impact. *Journal of the American Medical Informatics Association*, *26*(8–9), 689–695. https://doi.org/10.1093/jamia/ocz132

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[6] Pew Research Center, 2015

[7] Masterson Creber, R. M., Grossman, L. V., Ryan, B., Qian, M., Polubriaginof, F. C. G., Restaino, S., … Vawdrey, D. K. (2018). Engaging hospitalized patients with personalized health information: a randomized trial of an inpatient portal. *Journal of the American Medical Informatics Association*, *26*(2), 115–123. https://doi.org/10.1093/jamia/ocy146

[8] Office of the National Coordinator for Health Information Technology, 2020

[9] *Trump Administration Makes Sweeping Regulatory Changes to Help U.S. Healthcare System Address COVID-19 Patient Surge | CMS*. (2020, March 30). [Press release]. Retrieved from https://www.cms.gov/newsroom/press-releases/trump-administration-makes-sweeping-regulatory-changes-help-us-healthcare-system-address-covid-19

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