April 1, 2020

Donald W. Rucker, M.D.
Office of the National Coordinator for Health Information Technology (ONC)
U.S. Department of Health and Human Services
330 C St SW
Floor 7
Washington, DC 20201

Dear Dr. Rucker:

Pursuant to your request for public comments, in response to the 2020-2025 Federal IT Strategic Plan, The University of Mississippi Medical Center (UMMC) Telehealth Center of Excellence (COE) respectfully submits the following comments for your review and consideration.

Introduction:
Providing telehealth in Mississippi for close to two decades, UMMC is one of the nation's only two Telehealth Centers of Excellence. The success of our telemedicine programs led to a series of initiatives aimed at mitigating the increased health risks associated with poverty. By taking an innovative approach through telehealth, our institution was able to focus on addressing some of the root causes of poverty: poor health literacy, limited education, shortage of healthcare providers and rural transportation challenges.

The UMMC Center for Telehealth has a presence in over 200 locations in 68 of Mississippi's 82 counties. With over 500,000 virtual encounters and counting, UMMC has taken great leaps forward in building a comprehensive telemedicine delivery system.

Comments on Goal 1 - The promotion of health and wellness:
As an institution, UMMC emphasizes the need to foster a better understanding of how to use health IT to assess and address unmet patient needs. As leaders in healthcare, we believe it is critical to improve each individual's access to his or her own health information. Federal guidelines should support an individual's ability to access their health information by ensuring the possibility of data interaction via apps and other available tools. Federal support of plans to improve access to smartphones and other technologies will be key to mitigating access disparities. Capturing and integrating social determinants of health data into EHRs to assist in care processes are paramount to achieving an ideal healthcare delivery system.

Wearable technology has the potential to bring awareness to the forefront of the individual's mind by promoting healthy behaviors and self-management through apps. UMMC's remote patient monitoring model for chronic disease is a testament to the benefits of a digital program that empowers patients to take an active role in their day-to-day care. The use of applications that include virtual or augmented reality can be helpful in patient

education and adherence to medical recommendations. Furthermore, evidence-based digital therapeutics can also be leveraged as treatment options for patients. IT advancements designed to improve quality of care must work to improve efficiency and allow healthcare providers more meaningful time with their patients.

Comments on Goal 2 - Enhanced Delivery and Experience of Care:
We encourage the optimization of care delivery by applying advanced capabilities like machine learning, patient matching and precision medicine. All of these efforts will help organizations to better allocate precious resources available within the healthcare system. Additionally, the use of Health IT to promote safer clinical practices will further encourage practitioner engagement. We should be supportive of initiatives that streamline documentation and utilize AI when feasible.

Digital health Initiatives, such as telehealth, provide an opportunity to significantly impact the current healthcare system's most challenging problems: access to care, triage innovation and transformation, cost effective delivery, and distribution of limited providers. Telehealth has the potential to shift the current paradigm of care by improving health outcomes and access to care. However, state and federal laws will first need to support the necessary innovations in payor reimbursement, interoperability, licensing and legal challenges. Ultimately, the changes that support provider capacity for adoption of telehealth tools will lead to a digitally enhanced and transformed clinical delivery system.

Comments on Building a Secure, Data-Driven Ecosystem to Accelerate Research and Innovation:
We support the encouragement of pro-competitive business practices that allow individuals to choose from health apps and other IT tools. Consumers are the best drivers of the tools designed to benefit them. Likewise, we support efforts to merge administrative and clinical data streams to have real time financial data at the point of care. Key to this success are strong investments in health literacy initiatives. Care quality and price information should be available to consumers in an easily understandable format. Creating a common vocabulary and improved harmonization of data elements and standards will be key to realizing the consumer's best interests. We support the appropriate use of health and human services data, across federal and state level systems, to enable various types of research with emphasis on data user security.

Comments on Connecting Healthcare and Health Data through an interoperable Health IT Infrastructure:
We support the strengthening of communities' health IT infrastructure by facilitating a secure exchange of data across healthcare and human services settings. In the light of the constantly growing evidence that encourages outcomes for telehealth-enabled care delivery, we promote the adoption of required infrastructure necessary for telehealth deployment. Delivery of high quality care via virtual platforms cannot occur without an interoperable infrastructure that leads to easily accessible and actionable patient history, lab values and imaging, and other key clinical information. The FCC and large banks that cater to rural communities should focus on expanding access to broadband and the build-

out of an affordable broadband infrastructure. Cloud-based services that comply with federal standards need to be deployed in order to facilitate this much-needed expansion.

In Mississippi, we face great challenges in rurality and healthcare disparities. However, through our telehealth programs we have been successful in leveraging the connections, afforded by technology, to improve the lives of our citizens through. UMMC's work to date clearly demonstrates the value of technology-enabled health care in both rural and underserved communities. We thank you for your leadership and for your strong support for technology-enabled solutions to address today's health care challenges. We remain ready to provide additional assistance as needed.

Sincerely,

Richard L. Summers, MD, FACEP
Associate Vice Chancellor for Research
Principal Investigator of Telehealth Center of Excellence