

April 2, 2020

Don Rucker, M.D.
National Coordinator for Health Information Technology
Office of the National Coordinator
U.S. Department of Health and Human Services
330 C ST SW
Mary Switzer Building
Washington, D.C. 20201

Re: 2020-2025 Federal Health IT Strategic Plan

Submitted electronically at:

<https://www.healthit.gov/topic/2020-2025-federal-health-it-strategic-plan>

Dear Dr. Rucker:

NextGate appreciates the opportunity to submit comments to the Office of the National Coordinator for Health Information Technology (ONC) on the draft *2020-2025 Federal Health IT Strategic Plan*.

For more than two decades, NextGate has been helping healthcare organizations overcome the clinical, operational and financial challenges that result from fragmented EHR systems by enabling an accurate and fully integrated record of care. A global market leader in healthcare enterprise identification, NextGate's flagship Enterprise Master Patient Index (EMPI) solution currently manages patient identities for more than two-thirds of the U.S. population and over one-third of the population in the U.K and Australia. NextGate operates in five countries, with over 250 customers, and is deployed by the most successful healthcare systems and health information exchanges in the U.S.

General Comments

We are very supportive of the draft strategic plan and its emphasis on goals, objectives, and strategies, including its identification of the importance of accurate patient matching. Our detailed suggestions, primarily on patient matching-related strategies, are in the next section of this letter.

We were pleased that the 21st Century Cures Act directed the Government Accountability Office (GAO) to conduct a study on patient matching. We agree with the GAO report's findings that more can be done to improve patient record matching, including implementation of common standards for recording demographic data, best practice sharing, and public-private collaboration. We also emphatically support the view that no one effort or approach, including a unique national patient identifier, can solve the challenge of patient record matching.

In order to assess the current state of patient matching in the U.S., NextGate and eHealth Initiative (eHI) surveyed leaders at provider and HIE organizations.

Approximately 38% of U.S. healthcare providers indicated that they had an adverse event in the last two years as the result of a patient matching issue. Data entry errors were identified as the leading cause of duplicate medical records. As a result, there is a high level of support among HIEs and providers for the federal government to establish a nationwide patient matching strategy and to help fund a national patient identifier. Further, provider and HIE leaders see data standardization and biometrics as the most promising innovations to impact patient matching efforts nationally.

The results of the 2019 State of Patient Matching Survey in America can be found in its entirety here: <https://bit.ly/39XA2G9>.

Given the importance of this issue, NextGate appreciates and concurs with ONC's position that accurate patient matching is critical to interoperability and our nation's health information technology infrastructure. We applaud ONC's work in this area, including adding patient matching data elements to the 2015 edition certification criteria, publishing data quality best practices, the Patient Matching Algorithm Challenge in 2017, and including patient matching in the 2020 proposed HITAC work plan.

With respect to the latter work plan, we agree with comments at the recent HITAC meeting that patient matching should be shifted from the "longer term" to "immediate" activities category. In addition, we suggest that the HITAC's proposed hearings on patient matching be expanded beyond referential matching and machine learning to include biometrics, algorithm-based enterprise EMPIs, and improved quality and quantity of data available for matching.

This more immediate timing and broader scope is particularly warranted given the December 2019 explanatory statement accompanying the FY 2020 appropriations legislation for HHS and other federal agencies. As you know, the explanatory statement directs ONC to deliver a report to the Congress within one year of enactment on "technological and operational methods that improve the identification of patients".

Overall, we believe that an enterprise master patient index (EMPI), augmented with other technologies and processes, is the most promising path to near-term substantial increases in patient matching effectiveness. Rather than a centralized patient identity matching strategy, we favor a "bottoms-up" approach that builds on the activities of healthcare organizations and communities (e.g., multiple hospitals pointing to one EMPI) to implement EMPI-based strategies that integrate disparate systems and that emphasizes the need for continual increases in the quality of the data used for matches.

Detailed Comments

In these detailed comments, we focus on patient matching aspects of the draft plan.

Goal 2: Enhance the Delivery and Experience of Care

We strongly support this goal and especially Objective 2a: “Ensure safe and high-quality care through the use of health IT” and its recognition of the importance of “improved patient matching”. With respect to the associated strategy, “Continue efforts to establish identity solutions that improve patient matching across data systems,” we suggest the following revision: “Continue efforts to establish and enhance identity solutions that improve patient matching across data systems, including efforts to increase the availability and accuracy of data elements (e.g., USPS-standardized address formats) that can enhance patient matching accuracy”. Use of verified addresses standardized in the U.S. Postal Service (USPS) format has received significant expert and research-based support.¹ Enhanced patient address data can also support improved responses to social determinants of health.

We also strongly support Objective 2c: “Reduce regulatory and administrative burden on providers” and especially the strategy to “Monitor the impact of health IT on provider workflows to better understand and optimize the use of technology in ways that minimize unnecessary steps or negative outcomes for patients”. We suggest strengthening this strategy as follows: “Monitor and seek to optimize the impact of health IT on provider workflows to better understand and optimize the use of technology in ways that minimize unnecessary steps or negative outcomes for patients”. We believe that various federal government efforts can be extended to go beyond monitoring the impact of health IT on provider workflows and should seek to apply the results of federal and private sector monitoring to enhancing workflow, including but not limited to reducing regulatory burdens that complicate workflows.

We also strongly support the strategy to “Harmonize provider data collection and reporting requirements across federal agencies,” and suggest that it be refined as follows: “Harmonize provider data collection and reporting requirements across federal agencies, including support for public and private sector efforts to increase the accuracy and reduce burdens associated with provider identity management.” Based on our work with provider organizations, one important aspect of workflow enhancement is enabling more accurate and less burdensome provider identity management. This view is also reflected in recent federal government and private sector work.² We believe that the solution is a mix of federal government actions to improve provider identifier accuracy with private sector solutions, such as enterprise-level provider registries.

¹ Standardized Demographic Data Aids Patient Matching Rates, Pew Charitable Trusts, March 2019, <https://www.pewtrusts.org/en/research-and-analysis/articles/2019/03/22/standardized-demographic-data-aids-patient-matching-rates-study-shows>

² Improvements Needed to Ensure Provider Enumeration and Medicare Enrollment Data are Accurate, Complete and Consistent, Department of Health and Human Services Office of Inspector General, May 2013, <https://oig.hhs.gov/oei/reports/oei-07-09-00440.pdf>. An Industry Roadmap for Provider Data, The Provider Data Action Alliance, Convened by CAQH, May 2018, <https://www.caqh.org/sites/default/files/explorations/pdaa-industry-roadmap.pdf>.

Goal 3: Build a Secure, Data-Driven Ecosystem to Accelerate Research and Innovation

We strongly support this goal and especially Objective 3a: “Advance individual- and population-level transfer of health data” and the associated strategy to “Foster data governance that supports a secure, unified platform of researchers, innovators, individuals, payers, and healthcare providers to support innovative uses of shared data.” We suggest refining this strategy to reflect the central importance of accurate patient matching to data governance as follows: “Foster data governance, including accurate patient matching, that supports a secure, unified platform of researchers, innovators, individuals, payers, and healthcare providers to support innovative uses of shared data.”

Goal 4: Connect Healthcare and Health Data through an Interoperable Health IT Infrastructure

We strongly support this goal and especially Objective 4d: “Promote secure health information that protects patient privacy” and the strategy to “Implement privacy and security mechanisms as appropriate to the sensitivity of the data to help protect individuals’ health data, including multi-factor authentication and encryption embedded in APIs and other technologies”. We suggest refining this strategy to reflect the importance of accurate patient matching to patient privacy and data security as follows: “Implement privacy and security mechanisms as appropriate to the sensitivity of the data to help protect individuals’ health data, including multi-factor authentication and encryption embedded in APIs and other technologies that directly and indirectly enhance privacy and security, such as those that enhance patient matching accuracy.”

Conclusion

NextGate appreciates ONC’s efforts in improving patient matching as a fundamental component to interoperability and patient safety and is grateful for the opportunity to provide our comments on the 2020-2025 Federal Health IT Strategic Plan. We have invested over twenty years in enhancing patient matching accuracy and applaud ONC for advocating a broad, public/private stakeholder approach. Safe, cost-effective, high-quality care hinges on the ability to correctly match patients across settings and establish positive patient identification at every encounter. Should you have any questions or seek additional information, please contact Stephanie Fraser, Director of Communications and Media Relations, at stephanie.fraser@nextgate.com. We look forward to continuing the dialog and serving as a resource for the Administration going forward.

Sincerely,



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NextGate Solutions, Inc.



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