



January 28, 2019

The Honorable Alex Azar, Secretary
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Submitted electronically via healthit.gov

RE: Draft Strategy on Reducing Regulatory and Administrative Burden Relating to the Use of Health IT and EHRs

Dear Secretary Azar,

The Colorado Community Health Network (CCHN) appreciates the opportunity to provide comments in response to the draft *Strategy on Reducing Regulatory and Administrative Burden Relating to the Use of Health IT and EHRs*.

CCHN is the membership association for Colorado's Federally Qualified Health Centers (FQHCs). Colorado's 21 FQHCs operate over 200 clinic sites across the state, caring for Coloradans in 61 of the state's 64 counties. Colorado FQHCs are the health care home for more than 790,000 people. Colorado's FQHCs provide affordable, high quality, comprehensive primary care to medically underserved individuals, regardless of their insurance status or ability to pay for services.

CCHN and our members appreciate the Department's effort to reduce the burden associated with Health IT and EHRs and are overall supportive of the draft strategy. CCHN's comments mirror those of the National Association of Community Health Centers (NACHC). Please see NACHC comments for further details on each of the below.

- **Better Align EHR System Design with Real-World Clinical Workflows:** CCHN believes improving the usability of health IT systems is a key step in reducing provider burden. CCHN would encourage HHS to consider standards for how developers execute the initial implementation and deployment processes.
- **Standardize Results Display Conventions within Health IT:** CCHN would encourage HHS to consider standards and enforcements for laboratory vendors to ensure compatibility with EHR systems as a way to reduce the burdens associated with both sending laboratory tests and receiving results electronically.
- **Leverage Health IT Functionality to Reduce Administrative and Financial Burdens Associated with Quality and EHR Reporting Programs:** As recommended in Strategy 2 related to EHR Reporting, CCHN supports the development of standards for promoting interoperability and patient access to health information.
- **Inventory Reporting Requirements for Federal Health Care and Public Health Programs that Rely on EHR Data to Reduce Collection and Reporting Burden on Clinicians. Focus on Harmonizing Requirements across Federally Funded Programs that Affect a Critical Mass of Health Care Providers:** CCHN supports the recommendation in Strategy 2 of Public Health Reporting (page 66-67) to look at opportunities to inventory, harmonize, and provide additional guidance on reporting across federally funded programs. We thank the Department for recognizing community health centers as a key stakeholder in this effort and welcome the chance to partner with HHS to not only reduce burden but support targeted and coordinated approaches to care delivery across the health care system.

Thank you for the opportunity to comment on the Draft Strategy. Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Polly Anderson", with a long horizontal flourish extending to the right.

Polly Anderson
Vice President of Strategy and Financing
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