

The American Medical Group Association (AMGA) shares the principle that to achieve open, connected care for our communities, we all have the responsibility to take action. To further these goals, we commit to the following principles to advance interoperability among health information systems to enable free movement of data, which are foundational to the success of delivery system reform.

- Consumer Access: To help consumers easily and securely access their electronic health
 information, direct it to any desired location, learn how their information can be shared and
 used, and be assured that this information will be effectively and safely used to benefit their
 health and that of their community.
- 2. **No Blocking/Transparency**: To help providers share individuals' health information for care with other providers and their patients whenever permitted by law, and not block electronic health information (defined as knowingly and unreasonably interfering with information sharing).
- 3. **Standards**: Implement federally recognized, national interoperability standards, policies, guidance, and practices for electronic health information, and adopt best practices including those related to privacy and security.

AMGA represents some of the nation's largest and most progressive provider organizations, including more than 450 integrated healthcare delivery systems, multi-specialty medical groups, and other organized systems of care. Our members collectively account for 177,000 physicians, who care for approximately one out of every three Americans. AMGA members were early adopters of Electronic Health Records and are now leading a transformation of healthcare, based on AMGA's traditional values—coordinated, team-based, patient-centered care. AMGA members promote population health, accepting accountability for outcomes and the overall cost of care. Data transparency and interoperability are fundamental to these goals.

We believe healthcare information technology must be strengthened to allow for appropriate data mobility, addressing all obstacles to true interoperability. We appreciate the Administration's recognition of the importance of interoperability, which is essential for effective care coordination among providers and for including the patient as a full participant in his or her care.