



Interoperability Commitments Pledge

February 4, 2016

We, the American College of Physicians (ACP), share the principle that to achieve open, connected care for our communities, we all have the responsibility to take action. The ACP is the largest medical specialty organization and the second-largest physician group in the United States. ACP members include 143,000 internal medicine physicians (internists), related subspecialists, and medical students. Internal medicine physicians are specialists who apply scientific knowledge and clinical expertise to the diagnosis, treatment, and compassionate care of adults across the spectrum from health to complex illness.

To further these goals, the College commits to the following principles to advance interoperability among health information systems enabling free movement of data, which are foundational to the success of delivery system reform.

1. **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.

To this end, ACP is supportive of the new initiative being coordinated by the National Partnership for Women and Families entitled “GetMyHealthData” (<https://getmyhealthdata.org/>). The College will be working with the leaders of this collaborative effort to ensure that physicians in practice understand the HIPAA requirements and are able to implement workflows and processes within their practices to facilitate patient access to their health information. We currently make available extensive information on the HIPAA requirements to our members via our website (https://www.acponline.org/running_practice/practice_management/regulatory_compliance/hipaa/) and have plans to provide additional resources and information via ACP publications, such as the ACP Internist (<http://www.acpinternist.org/>).

ACP also supports transparency in health data availability. Initiatives such as the OpenNotes project, which encourages patient access to clinician notes, are showing early benefits. Additionally, ACP supports patient ability to verify information in their health records and correct misinformation.

ACP has incorporated information, tools and resources pertaining to patient access into the modules that are available to physicians and practices via the ACP Practice Advisor®

(<https://www.practiceadvisor.org/home>). The Practice Advisor modules focus on the attributes of providing patient-centered quality care using appropriate health information technology.

ACP supports research to identify best practices for engaging patients in electronic health information access and use. The current system of providing patient information through patient portals is a step in the right direction. However, more work needs to be done to better understand the barriers to patient portal access and how patients act upon accessed health information. Additionally, research should be performed to understand if other modalities to deliver health information, such as mobile, better engage patients in their health information.

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).

ACP is strongly supportive of meaningful and appropriate exchange of health information and believes that actions that will improve the availability of usable clinical information to physicians and other treating clinicians should be a top priority. In this context, it is important to note that software, services, and infrastructure to facilitate the transmission of health data are not free and that practices must currently pay for each connection from their EHR system to an information source or delivery target. Therefore, it is critical that the costs associated with expensive interfaces and data transfer not be shifted to and borne by physicians.

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.

For over 15 years, ACP has played a significant role in the development and adoption of health IT standards, guidance, and best practices. We present the voice of internal medicine and primary care in general, as well as the needs of small and medium ambulatory practices, in all forums where relevant standards and guidance are discussed and developed, such as Health Level 7 (HL7) and Integrating the Healthcare Enterprise (IHE) as well as previous national initiatives. Often we find that we are the sole voice for this group, or one of a very small number of representatives. It is critical that health IT standards and guidance meet the requirements of these groups and minimize the negative impacts that come with excessive complexity.

As indicated above, ACP is fully committed to implementing these commitments in a number of ways and interested in collaborating with other stakeholders to facilitate the achievement of an open, connected care continuum throughout the country for our members and their patients.