

February 5, 2016

Karen DeSalvo, M.D., M.P.H., MSc
National Coordinator
Office of the National Coordinator for HIT
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, D.C. 20024

Dear Karen,

Catholic Health Initiatives is the nation's second-largest nonprofit health system, based in Englewood, Colorado. CHI operates in 19 states and comprises 102 hospitals, including four academic medical centers and 30 critical access hospitals, as well as numerous community health-service organizations; accredited nursing colleges; home-health agencies; living communities; and other facilities and services that span the inpatient and outpatient continuum of care.

We, Catholic Health Initiatives (CHI), share the principle that to achieve an open, connected care system for our communities, we all have the responsibility to take action. To further these goals, CHI supports 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.
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.



CHI has been implementing electronic health records (EHRs) system-wide for several years and is committed to achieving interoperability both within our system and externally to enhance and improve our patients' experience. Current and continuing efforts are focused on achieving interoperability among various EHR software programs at our owned care sites, which will be followed by wider interoperability expansion into the community.

For further contact or additional information Ann Shepard, Vice President Clinical Systems can be reached at AnnShepard@catholichealth.net.

Sincerely,

[signed]

Kevin E. Lofton, FACHE
Chief Executive Officer
Catholic Health Initiatives