



January 15, 2016

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Karen B. DeSalvo, M.D., M.P.H., M.Sc.
National Coordinator for Health Information Technology
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

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(President & CEO) - CHIME

Dennis J. Gallitano, Esq. (General Counsel)
Gallitano & O'Connor LLP

Dear Dr. DeSalvo:

In a December 11, 2015, blog post you outlined three core principles that are foundational to delivery system transformation. The College of Healthcare Information Management Executives (CHIME) supports your efforts to encourage greater public-private sector collaboration as we strive to achieve a truly connected healthcare environment. Below are more detailed thoughts on how we can work together to attain these goals.

Consumer Access

CHIME supports the need to ensure that patients have unfettered access — as permitted by law — to their health care information. As patients and providers increasingly tap into electronic tools, patient engagement and access to information is taking center stage. We were pleased to see that the Office for Civil Rights recently published guidance further detailing the circumstances under which providers can share patient information. We agree that we must remove obstacles that stand in the way of patients accessing their information. At the same time, we support adding flexibility to the Meaningful Use program that gives hospitals and physicians credit for engaging patients in a variety of manners.

Sharing Patient Information Among Providers

We share ONC's desire to ensure providers are sharing patient information as permitted by law. The interoperability of disparate systems will make the concept of a longitudinal care record a reality. We believe longitudinal care records should consist of provider, payer and patient-generated data, and be accessible to all members of a care team, including the patient, in a single location. An information-rich record, supported by widely adopted standards, will improve a patient's ability to manage consent privileges and diminish privacy concerns related to the digitization of personal health information (PHI).



Foundational to driving greater interoperability and better care is the ability of providers to accurately and consistently match patients with their data. In order to achieve this shared vision, CHIME is at the forefront of a national effort that we believe will help us find a solution to the problem of patient identification. The CHIME National Patient ID Challenge is a \$1 million crowdsourcing initiative that aims to find a method for safely, accurately and privately identifying a patient 100 percent of the time. This is a key component to moving the dial forward on interoperability.

Standards

CHIME has long championed the need for a clear set of strong and enforceable standards. An information-rich record, supported by widely adopted standards, will improve a patient's ability to manage consent privileges and diminish privacy concerns related to the digitization of personal health information. Having these standards are critical to achieving not only the Tripe Aim, but also the Quadruple Aim, which seeks to also improve the caregiver's experience. CHIME members firmly believe that a more defined technical infrastructure is needed to catalyze innovations in digital health. Implementing federally-recognized, national interoperability standards, policies, guidance, and practices for electronic health information, and adoption of best practices, including those related to privacy and security, will put the nation closer to achieving our shared goals.

Thank you again for seeking our support for these important principles and we look forward to continuing to be an engaged stakeholder. Please know that CHIME pledges to give full effort to advocate, educate and support healthcare transformation through the strategic application of health information technology and process reengineering. Do not hesitate to call on CHIME to aid in the fight for a revolutionary new healthcare environment.

Sincerely,

[signed]

Russell P. Branzell, FCHIME, CHCIO
President and CEO

[signed]

Marc Probst, CHCIO
Chair, Board of Trustees

Enclosed: ONC Healthcare Pledge



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We, CHIME, share the principle that to achieve an 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 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.

Sincerely,

[signed]

Russell P. Branzell, FCHIME, CHCIO.
CEO & President

[signed]

Marc Probst, CHCIO
Chair, Board of Trustees

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