



February 6, 2015

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

RE: Federal Health Information Technology Strategic Plan for 2015-2020

Dear Dr. DeSalvo:

Ascension appreciates the opportunity to comment on the draft Federal Health IT Strategic Plan 2015-2020 as published by the Office of the National Coordinator (ONC) in the December 10, 2014 Federal Register.

Ascension is nation's the largest non-profit health system in the U.S. and the world's largest Catholic health system, serving 1,900 sites of care in 23 states and the District of Columbia. Ascension is committed to delivering person-centered care within a sustainable cost structure, building capabilities to manage the health of defined populations, and ensuring that all persons can access environments and healthcare that create and support the best journey to improved health status.

We appreciate the work of ONC and several other agencies to create a robust, future-looking vision for health information technology (IT) within the United States and support advancing to a policy and operational environment that supports the availability of secure, relevant patient information at the point of care. Health IT is a broad term that is ever morphing and evolving and care providers face an increasing regulation and federal reporting requirements. As such, we particularly appreciate the continuing efforts to bring together and coordinate across federal agencies and policymakers.

The draft strategic plan identified five goals for the health system at large:

1. Expand adoption of health IT
2. Advance secure and interoperable health information
3. Strengthen health care delivery
4. Advance the health and well-being of individuals and communities
5. Advance research, scientific knowledge and innovation

Each in and of itself is a significant undertaking, as are the objectives tied to each overarching goal. Further, while the Plan is published as a federal strategy document, ONC notes that a broad range of public and private stakeholders is essential to achieving the Plan's objectives. We recommend ONC more clearly delineate the unique federal role and

specific, measurable actions that will be taken or tactics deployed in support of the Plan to ensure transparency, progress and accountability. ONC should also include specific measures or milestones that correspond with the three and six year objectives under each goal.

The goals outlined in the Plan are sweeping and ambitious. As we have learned through the nation's efforts to implement the Medicare and Medicaid EHR Incentive Programs ("Meaningful Use"), achieving advances in interoperability, for example, requires a high degree of collaboration among disparate stakeholders, focused federal leadership, commitment from provider organizations, aligned incentives, and a great deal of operational "heavy lifting." Rather than multiple difficult to measure three and six-year objectives, ONC may consider a prioritized ranking of achievable milestones over the Plan period that advance the five overarching goals.

To that end, we agree with the American Hospital Association's (AHA) perspective that to make progress in the area of health IT with limited federal resources, some goals should be prioritized over others. We support the AHA's assertion that two of the objectives under the second goal are a prerequisite to fulfilling other goals and should, therefore, be addressed first:

- Enable individuals, providers and public health entities to securely send, receive, find and use electronic health information.
- Identify, prioritize and advance technical standards to support secure and interoperable health information.

We urge ONC to consider the exchange of information and data liquidity in light of how that information would best be used. We recommend ONC expand the Federal Health IT Principles to include a focus on engagement for our nation's patients and consumers:

- Transform the Patient Care Experience: use health IT to empower consumers and their family caregivers; create equity and reduce disparities for consumers and vulnerable individuals; and use Health IT to create a better experience of care.

We also recommend the following addition to the Objectives and Strategies:

- The ability for consumers to aggregate data from multiple sources (such as portals and websites), portal usability and design for consumers and access to health information through mobile devices

To improve care and quality and to reduce unnecessary costs, data must be timely, relevant and targeted. Efforts to facilitate more effective information exchange should prioritize key clinical information and information to advance population health, care management and patient engagement. The Health Information Technology for Economic and Clinical Health (HITECH) Act was part of a federal stimulus package and catalyzed electronic health record (EHR) adoption and job creation. However, the health care delivery landscape is markedly different in the wake of the Affordable Care Act (ACA) and other market reforms. Hospitals and physicians are increasingly working to integrate a broader ecosystem of care providers to create accountable patient care networks and to help patients access preventative and

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community services to better manage chronic conditions. The EHR is just one Health IT tool used by providers who are increasingly leveraging technologies to aggregate and analyze clinical data to improve care, send alerts to members of a care team to address gaps in care, and to identify and address health disparities.

Ascension strongly concurs with the AHA and other industry experts that progress in this area also relies on solving the problem of correctly matching patients to their records, as well as other methods to accurately authenticate information across data sources. We join AHA in urging ONC to build on the work it started in 2014 to make progress on patient matching. As the largest community hospital system in the country, we can provide specific examples at a local, regional and national level of how critical a patient matching solution is to advancing the goals outlined in the draft Plan.

Finally, Ascension firmly believes that a patient's data belongs to the patient. Hospitals and other care providers are trusted stewards of that information but are not owners of that data. We appreciate ONC's focus in this plan on expanding consumer access to their data (and empowering family/caregivers) and urge ONC to provide more specific information on how it sees both the federal government and the private sector advancing this goal.

Ascension appreciates the opportunity to share our comments. Ascension leadership offers its diverse health IT experience within multiple care settings as a resource and partner in your efforts to advance a federal health IT strategy. Please let us know if we can offer any additional assistance. We would welcome the opportunity to meet with you to further discuss our comments.

Sincerely,



Mark D. Barner
Senior Vice President and CIO, Ascension
President and CEO, Ascension Information Services