

February 5, 2015

Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
200 Independence Avenue SW
Suite 729-D
Washington, DC 20201

Submitted electronically at:

<http://www.healthit.gov/policy-researchers-implementers/strategic-plan-public-comments>

Attention: Public Comment on Federal Health IT Strategic Plan, 2015-2020

Dear Office of the National Coordinator for Health IT:

The Association of State and Territorial Health Officials (ASTHO) is pleased to submit comments on the draft Federal Health IT Strategic Plan, 2015-2020. ASTHO is the national non-profit organization representing the state and territorial public health agencies of the United States, the U.S. Territories, and the District of Columbia, as well as the 100,000 public health professionals these agencies employ. ASTHO's members, the chief health officials of these jurisdictions, are dedicated to formulating and influencing sound public health policy and to assuring excellence in state-based public health practice. ASTHO and its members work to strengthen and improve the nation's public health capacity through focus on health protection, health promotion, and health system transformation.

ASTHO supports the overall goals and objectives of the Strategic Plan and ONC's approach of building on progress enabled by the EHR Incentive Program while advancing the health IT vision beyond EHRs and Meaningful Use. Many of these federal goals and objectives align well with the informatics priorities of our members at state health agencies, such as data sharing and interoperability, ensuring data privacy and security, and using health IT to address social determinants of health and health disparities.

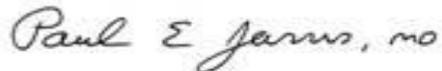
ASTHO supports the Strategic Plan's recognition of the role of public health entities in health information exchange and use, and the importance of standards to enable secure, interoperable health information across healthcare and public health. However, public health is more than just a consumer of health information. Many state public health agencies collect manage and store individual clinical data as preventive and clinical service providers. Furthermore, state public health agencies generating valuable population health information from data collected from clinical providers that can, in turn, benefit direct clinical care. Information such as incidence rates of infectious disease, notifications about outbreaks or other public health emergencies, and vital records, can help enhance clinical care via clinical decision support, health alerts, and other health IT tools. Public health plays a role broadly across the goals of collecting, sharing, and using health information.

The need for public health entities to build the technical and administrative infrastructure to receive and make use of the increasing volume of information from healthcare is felt acutely at all levels of local, state, territorial, and federal government. Meeting this need will improve public health's ability to protect and promote healthy communities through surveillance, emergency preparedness, prevention,

and other essential public health services. While technical platforms, data infrastructure, and public health systems are important and vital aspects of infrastructure, infrastructure must also include a workforce that can meet the demands of a changing healthcare and public health landscape and ensure the quality and effectiveness of health IT initiatives. Health agencies are constantly challenged with limited resources to train, recruit, and retain staff with the skills necessary to facilitate information exchange and collaboration with clinical care. With the increasing focus on population health in the Affordable Care Act era, public health has a wealth of information and expertise to offer healthcare partners. Strengthening the informatics workforce capacity and capabilities of health agencies would go a long way toward improving public health-healthcare collaboration for better care as well as protecting the overall health of the nation.

ASTHO appreciates the work and vision of ONC in convening federal agencies and partners to develop this Strategic Plan. We look forward to the release of the Nationwide Interoperability Roadmap and seeing how this plan will be advanced and implemented in the coming years. ASTHO looks forward to continuing to work with ONC and other federal partners to facilitate better integration of the work of state public health agencies with that of clinical health care through the adoption and use of health IT.

Sincerely,

A handwritten signature in cursive script that reads "Paul E. Jarris, MD". The signature is written in black ink on a white background.

Paul E. Jarris, MD, MBA