February 5, 2015

Karen DeSalvo, MD MPH
Acting Assistant Secretary for Health and
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
200 Independence Ave., S.W.
Washington, DC 20201

Dear Dr. DeSalvo:

On behalf of Dignity Health and our 38 hospitals in Arizona, California and
Nevada, and more than 340 care centers in 21 states, I am pleased to provide
comment on the draft Federal Health Information Technology Strategic Plan for
2015-2020 released December 2014. As the nation's fifth-largest non-profit
hospital system, Dignity Health is committed to our mission of providing
compassionate, high-quality care to all and strongly supports the use of Health
Information Technology (HIT) as the central tool to transform health care
delivery to a patient centered care model. Dignity Health appreciates the Office
of the National Coordinator (ONC) of Health Information Technology updating
the federal health IT strategic plan for the third time.

As outlined in the Health Information Technology for Economic and Clinical
Health (HITECH) Act, a key role of the ONC is to "coordinate health information
technology policy and programs of the [HHS] with those of other relevant
executive branch agencies with a goal of avoiding duplication of efforts and of
helping to ensure that each agency undertakes health information technology
activities primarily within the areas of its greatest expertise and technical
capability and in a manner towards a coordinated national goal."
This type of coordination is crucial to harness and leverage federal investments
and align private-sector priorities. Providers and vendors alike would benefit
from a clear picture of activities that will be undertaken by the federal
government. **Thus, Dignity Health encourages the ONC to reframe the
strategic plan to identify the unique federal roles and activities that can be
used to assess progress toward the outcomes, rather than addressing broad
health system goals.**

STRATEGIC GOALS

The purpose of a strategic plan is to set goals and provide specific steps and identify the resources to achieve them. This level of detail is necessary, particularly for private-sector partners seeking to align priorities and understand how the federal government will act in the future. In the strategic plan, the ONC outlines five overarching 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

While Dignity Health agrees with the broad goals, the plan does not create a deliberate approach to identify current capacity among providers or recognize federal initiatives to optimize existing resources.

For example, the second goal of the strategic plan is to advance secure and interoperable health information. To achieve this goal, the plan identifies three objectives, outlined below:

- 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.
- Protect the privacy and security of health information.

Dignity Health agrees these objectives are laudable and play a significant role in the ability of the health care ecosystem to meet other goals and objectives. Further, unless the health care ecosystem is able to successfully meet the second goal, the rest of the strategic plan is unreachable.

Hospital experience with meaningful use stage 2 requirements illustrates the fundamentally flawed assumptions about the existing infrastructure to allow for secure information exchange. Despite some success in meeting these requirements, hospitals continue to struggle to meet reporting requirements and have developed expensive work-arounds to meet reporting thresholds, which do not necessarily improve patient care. From Dignity Health's perspective, there also exist unrealistic expectations on the vendors, who are charged with delivering program updates to systems that lack maturity and are fragmented. Particularly for large, complex systems such as Dignity Health, where updates require refinements of existing customized workflows, deliberate planning is necessary. To create an expectation of safe and secure information exchange across systems of care requires a realistic view of existing infrastructure, and a clear path for the health care ecosystem to move toward.

Dignity Health urges the ONC to provide more details on how goals will be accomplished, including specific activities by individual agencies, expected timelines for completion of those activities, and an assessment of whether federal resources are sufficient to complete all of the ambitious goals

outlined, particularly in the area of advancing secure and interoperable health information. We also recommend the ONC establish a public-facing mechanism to provide transparency on agency progress to execute on the plan, including bringing together provider and vendor leaders to align resources and expectations.

PATIENT MATCHING

Even if secure and interoperable health information becomes reality, without an adequate way to authenticate a patient's identity, the value of the exchange is diluted, and in some cases potentially harmful, if there does not exist an adequate way to correctly match information to the correct patient. From a public health perspective, patient matching is critical for agencies to address larger public health issues. The strategic plan briefly identifies the need to correctly match patients to their records, as well as other methods to accurately authenticate information across data sources, but does not include patient matching as a fundamental goal.

Dignity Health has invested significant resources to implement an enterprise master patient index to reconcile patient identity across the acute and ambulatory setting. Despite these investments, there remains variability in matching within Dignity Health and matching with our data partners throughout the health care community. A standardized set of matching criteria would help mitigate this variability, and would help build a trust framework that will facilitate patient matching at a larger scale. In addition, while many ambulatory EMRs have some level patient matching functions to facilitate results delivery from an outside source (i.e. lab results, imaging, etc.), the exchange of information through the use of Transition of Care documents that are delivered through the direct protocol require manual reconciliation. The move toward the accurate exchange of this type of information can occur through technology, but will also require significant workflow changes and human intervention.

The health care community has to be given the opportunity to build both the technology and the workflow changes. In addition to leveraging best practices across the industry, the ONC should explore ways to incorporate federal efforts to identify and authenticate individuals for public programs (such as the federal health insurance exchange) and in cyberspace (such as the activities of the National Institute for Science and Technology). **Dignity Health encourages the ONC to make patient matching a priority, and take steps to standardize matching criteria while recognizing the ongoing need for human intervention.**
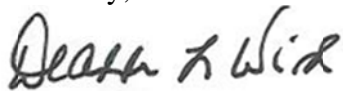
PUBLIC-PRIVATE PARTNERSHIP

While this is a federal health IT strategic plan, it assumes investments and activities by the private sector, such as "incorporating precision medicine and predictive modeling into care delivery." While these goals are certainly shared outside the federal sector, it would be helpful if the strategic plan were accompanied by an evaluation of whether these expectations map to the strategic priories of your private-sector partners, and whether current market dynamics and private-sector resources are sufficient to support them. This evaluation should be done in the context of all of the other federal requirements currently placed on the health care sector, which has experienced a tremendous increase in regulatory burden over the past decade. **Dignity Health encourages the ONC to move forward in partnership with the private sector and is poised to work with the Office to accurately assess current investments and requirements, and gain stakeholder input in a transparent way.**

CONCLUSION

Thank you for putting forward this ambitious strategic plan. Dignity Health is committed to continuing our work to leverage the benefits of health IT and looks forward to the benefit of an accurate picture of how federal investments and activities will be coordinated to move forward on interoperability and create a more efficient infrastructure for overall exchange of health information.

Sincerely,

Deanna Wise
Executive Vice President and
Chief Information Officer