



February 6th 2015

Dr. Karen B. DeSalvo  
National Coordinator for Health Information Technology  
Office of the National Coordinator for Information Technology  
200 Independence Avenue S.W.  
Suite 729-D  
Washington, D.C. 20201

*Via Electronic Submission*

**Re: Federal Health IT Strategic Plan 2015 - 2020**

Dear Dr. DeSalvo:

Elsevier is pleased to submit written comments on the Federal Health IT Strategic Plan 2015 – 2020 (“Plan”).

Elsevier is a leading international provider of health and scientific information, evidence-based content, robust analytics, and integrated clinical workflow solutions for a diverse set of health care settings and health care providers. Elsevier’s clinical decision support tools have helped the company drive health care transformation for over twenty years, pursuing the development of advanced care processes and improved clinical outcomes. Elsevier’s clinical decision support products aim to provide the best opportunity possible for the meaningful use of health information technology (“health IT”). The foundational work accomplished by Elsevier Clinical Solutions supports the goal of moving the United States to a value-based purchasing system where payment for health care is directly linked to quality of care.

Based on its experience, time-tested practices, and commitment to provide clinical decision support at the point of service, Elsevier strongly supports ONC’s Plan. We applaud ONC’s focus on person-centered care, as well as its efforts to establish an environment of secure universal health information exchange. Elsevier believes that in order to achieve this goal, ONC should promote transformational efforts that focus on enabling better clinician use of health IT. In particular, we recognize the value of providing evidence-based integrated clinical decision support tools.

Elsevier supports the six health IT principles identified as part of the Plan. In order to highlight how health IT is shaping the healthcare landscape, ONC should consider adding a seventh principle focused on driving practice transformation efforts:

- **Support practice transformation.** Federal health IT policy will promote practice transformation as the ultimate goal of health IT, evidence-based clinical decision support and implementation methodologies.

Elsevier offers the following comments on the five goals comprising the Plan.

### **Goal 1: Expand Adoption of Health IT**

Elsevier is pleased that ONC continues to support the adoption of health IT. A comprehensive approach is necessary to achieve a health care environment in which high-quality, accurate, and relevant information can be shared easily and appropriately among health care providers and individuals. While incentive payments have spurred health IT adoption, successful implementation will require interoperable tools that use a common language and technical standards.

### **Goal 2: Advance Secure and Interoperable Health Information**

Elsevier strongly supports ONC's efforts to promote a nation-wide system of secure interoperable health information sharing and use. We share ONC's recognition that interoperability requires common technical and vocabulary standards to allow seamless and secure sharing of information throughout the health care environment, which drives better clinical decision support.

- Objective 2A: Elsevier endorses the promotion of coordinated care for individuals across the care continuum. ONC should continue to focus on supporting innovations that facilitate communication between providers and patients. One such innovation is the adoption of EHR systems that incorporate evidence-based, standardized content. These systems allow the interprofessional team of clinicians to efficiently adopt clinical decision support tools by providing them with a cost-effective means to adopt a common vocabulary.
- Objective 2B: Clinical decision support requires efficiently integrating information from a diverse range of sources. To this end, Elsevier supports ONC's goal of advancing technical standards to support secure and interoperable health information. ONC's promotion of the "Health eDecisions" ("HeD") standard for EHR technology will enable wider acceptance and distribution of cost-saving decision support tools.

### **Goal 3: Strengthen Health Care Delivery**

Elsevier applauds and supports ONC's efforts to improve the quality of our nation's health care system. Clinical decision support is an essential component of this mission. Clinical decision support achieves a triple aim: improving the experience of care, improving the health of populations, and reducing the per capita cost of health care.

Objective 3A: An efficient clinical workflow is a prerequisite to providing quality care. Elsevier's extensive experience in developing decision support tools demonstrates the positive outcomes that are unlocked when usable electronic information is incorporated into the clinical workflow. We encourage ONC to continue to promote this process. In addition, Elsevier agrees that increasing health literacy among patients will unlock further benefits by allowing them to better manage their own health care.

- Objective 3B: Elsevier strongly supports ONC's efforts to encourage the delivery of high-value care. We recognize the massive potential of health IT to improve the accuracy and consistency of documentation, enabling evidence-based care. Elsevier was an early pioneer partnering with health IT vendors to deliver accurate and consistent documentation based on professional process of care. We encourage ONC to continue its efforts in this area.
- Objective 3C: Elsevier supports ONC's objective of promoting clinical decision support as a means to effect positive change in community services and population health.

#### **Goal 4: Advance the Health and Well-Being of Individuals and Communities**

Elsevier stands with ONC in its effort to realize the vision of a person-centered health care system. We recognize that technology can empower individuals to participate in their own health care, but that such gains also require corresponding attention to improvements in health IT implementation methodologies and practice transformation efforts.

- Objective 4A: In order to enable individuals to understand and meaningfully use health IT resources, Elsevier stresses that these resources must be evidence-based and user-friendly. Decision aids and risk calculators are examples of tools that allow providers and individuals to cooperate to improve health care outcomes.
- Objective 4B: Elsevier understands that our nation's health care system cannot be strengthened without a holistic approach that supports public health entities and community-based organizations. We encourage ONC to continue to expand the use of health IT resources to manage chronic health conditions, anticipate threats, and promote the resilience of community health systems.

#### **Goal 5: Advance Research, Scientific Knowledge, and Innovation**

Elsevier shares ONC's dedication to promoting clinical research as a driver of innovation. However, we stress that in the coming years, practice transformation efforts will be crucial to ensuring that advances in scientific knowledge translate to sustainable improvements in care.

- Objective 5C: Elsevier applauds ONC's recognition that the adoption of health IT is not sufficient without intentionally implementing methodologies to ensure that providers can meaningfully use new tools. It has been Elsevier's experience that there is an implementation science to strategize, engage, prepare, activate, and optimize health IT in organizations to realize practice transformation and sustainable outcomes. We fully support ONC's goal of improving adherence to evidence-based medicine within six years, but in order to do so, ONC should focus on promoting the use of evidence-based tools, beginning today. The key to such efforts is focusing on the rapid translation of evidence from health services research and organizational learning into health IT products and practice transformational efforts.

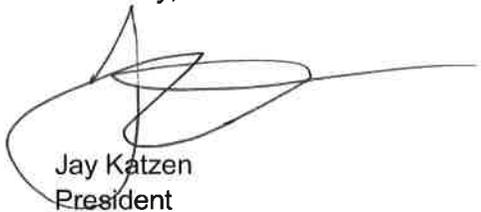
#### **Conclusion**

Elsevier appreciates the opportunity to provide comments on the Plan. We recognize that the document is the product of several years of valuable work by ONC to help transform our nation's health care system to one that is technologically advanced, accessible, and effective for all citizens. Moving forward, ONC, along with its partners across the health care delivery spectrum, must begin

to shift focus from adoption of health IT to broader implementation and meaningful inclusion of these valuable tools. Health IT promises to deliver myriad benefits to providers and individuals alike, but to do so, we must all work together to transform health care delivery. We look forward to a future in which all health care providers have access to evidence-based tools that are integrated into the clinical workflow, allowing providers and individuals alike to efficiently share information using a common language. It is crucial that any strategic plan for the future of health IT focus on implementation methodologies and practice transformational efforts. Elsevier stands ready to cooperate with ONC on this important effort.

If you have any questions, please feel free to contact Adam Huftalen, Senior Manager of Federal Government Affairs, at (202) 857-4644 or [adam.huftalen@reedelsevier.com](mailto:adam.huftalen@reedelsevier.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jay Katzen', with a long horizontal flourish extending to the right.

Jay Katzen  
President  
Elsevier Clinical Solutions