

NACCHO

National Association of County & City Health Officials

The National Connection for Local Public Health

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Department of Health and Human Services
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Attention: Health IT Strategic Plan

Dear Dr. DeSalvo:

On behalf of the National Association of County and City Health Officials (NACCHO), I appreciate the opportunity to provide input on the proposed Federal Health Information Technology (IT) Strategic Plan.

The National Association of County and City Health Officials is the voice of the 2,800 local health departments across the country. These city, county, metropolitan, district, and tribal departments work every day to ensure the safety of the water we drink, the food we eat, and the air we breathe. NACCHO promotes national policy, develops resources and programs, advances health equity, and supports effective local public health practice and systems.

NACCHO is very supportive of electronic health record (EHR) adoption and investments in the nation's health IT capacity. While health IT does not change people's health status, an effective and efficient system enables a local health department to:

- Monitor chronic diseases such as childhood asthma or diabetes, and outbreaks of infectious diseases, such as E. coli.
- Communicate important health information and notify the public about local emergencies.
- Evaluate policies, programs and services to ensure they are aligned with the community's needs.
- Limit dangerous and costly prescribing errors and environmental risks.
- Communicate with physicians about practice patterns and disease management.
- When disease outbreaks or disasters strike, health IT helps ensure that vital public records are not lost and enables local health departments to act swiftly and in coordination with other first responder agencies such as police, fire departments, and emergency medicine.

NACCHO would like to highlight that there are significant barriers to adoption of HIT among public health stakeholders. Local health departments all over the United States have experienced a decline in workforce capacity, with the total public health workforce shrinking 15% since 2008. Therefore, we encourage ongoing efforts by the Office of the National Coordinator for Health Information Technology (ONC) and federal partners like the Centers for Disease Control and Prevention (CDC) to advance local health departments' use of HIT and achieve Meaningful Use. ONC, CDC and other federal partners should develop tools, guidance and technical assistance to help local health departments, in



coordination with health care providers in their communities, to gain HIT capacity and capitalize on the opportunity to use health care data to improve population health and eliminate health disparities.

Overall Comments on the Strategic Plan

We applaud ONC's development of a strategic plan to direct federal efforts to develop the nation's health IT infrastructure. NACCHO is pleased that ONC recognizes that public health departments are a critical component of the health delivery system, and as such has made public health agencies a critical component of the Federal Health IT Strategic Plan. Public health is mentioned in all five strategic goals, and in numerous objectives within those goals. Further, NACCHO applauds the recognition of the importance of local and tribal collaboration in the implementation of the Federal HIT Strategic Plan. Local health departments play a critical role in gathering the data needed for successful population health management and improvement. Public health entities are continuously mentioned specifically throughout the Strategic Plan, and it is clear that ONC recognizes the vital role public health plays in population health management. A large quantity of public health data that state public health agencies and the CDC uses originates within local health departments. We urge ONC to continue engaging local health departments as essential governmental health partners to achieve the common mission of enhancing the health and well-being of Americans.

NACCHO is concerned about the broad definition of "providers" used in the strategic plan, including public health entities within this definition. Because the definition of a health provider is commonly accepted as a provider of individual clinical care, it is likely this broad definition could lead to a misinterpretation of ONC's objectives and goals. NACCHO believes public health entities should be defined separately from other health care providers.

Goal 1: Expand Adoption of Health IT

Objective 1A: increase the adoption and effective use of Health IT products, systems and services

NACCHO supports the Meaningful Use incentive program as a method to expand the adoption of health IT. The Meaningful Use program should enable local health department participation in the exchange of health information with healthcare providers and hospitals. Local health departments need to be able to access health data from EHR technologies to improve common public health practices, such as monitoring chronic disease and reporting of notifiable disease. The continued inclusion of the Meaningful Use public health objectives are paramount to the increasing exchange of health information between care providers and local health departments.

NACCHO urges ONC to support the development of public health IT incentives for the adoption for non-EHR technology, specifically outbreak management health IT. On January 13, the Health IT Policy Committee (HITPC) held a virtual hearing on the public health response to the Ebola outbreak and the current state of outbreak management. IT EHR technology is not capable of performing a variety of functions needed for an outbreak management system. These functions include case management, case reporting, contact tracing, and visualization for situational awareness. In light of the recent crisis with Ebola, the investment in outbreak management health IT will help to ensure the safety of the public's health during a disease outbreak.

Objective 1C: Advance a national communications infrastructure that supports health, safety, and care delivery

NACCHO supports increased efforts to bring high speed Internet connections to all Americans. Local health departments should be included in the efforts to expand high speed Internet to rural and tribal settings. NACCHO found in its 2010 *Needs Assessment of Local Public Health Informatics* that about 85%

of local health departments have access to high-speed Internet,¹ and that percentage gets smaller within rural communities. Increasing the access to high speed in rural communities will enable local health departments to take advantage of the benefits of high speed Internet, and help connect local health departments to the communities they serve.

Goal 2: Advance Secure and Interoperable Health Information

Objective 2A: Enable individuals, providers, and public health entities to securely send, receive, find and use electronic health information.

NACCHO supports the Federal Health IT Strategic Plan's inclusion of public health departments as vital health information exchange partners. ONC should encourage electronic information sharing not only between public and private health providers, but local health departments as well. The timely exchange of clinical data is essential for automated disease reporting, laboratory reporting, and digital disease surveillance. In order to maintain situational awareness for a particular population, care providers will have to work closely with local health departments, which are on the front line for population health management for each local jurisdiction. ONC should work with CDC and other partners to develop tools and resources for local health departments to develop systems that allow for interoperable, secure and standardized health messages. ONC should also encourage HHS to align all information technology investments with local public health departments. This will ensure integration across particular programs, and reduce the number of data silos within the public health system.

Objective 2B: Identify, prioritize, and advance technical standards to support secure and interoperable health information

NACCHO supports the establishment of technical standards that support interoperable health information exchange for local health departments. As the nation's health care system moves away from a disease-based to a health-based model of care, the establishment of standards is necessary for health departments to access clinical data reliably and with ease in order to facilitate a learning health system. ONC should continue to partner with CDC and public health stakeholders to develop up to date messaging guides and implementation guides for data standards.

Objective 2C: Protect the privacy and security of health information

With the increased use of and reliance on technology by local health departments, the need to protect health information and public health infrastructure, as well as its resilience to cyber-attacks, is vital. The health care system depends upon the confidentiality, integrity, and availability of data storage and delivery systems. Local health departments need support to develop and implement policies, practices and education to address cybersecurity risks. ONC should work with CDC to develop tools, guidance and technical assistance to help local health departments manage and implement cybersecurity policies and resources.

Goal 3: Strengthen Health Care Delivery

Objective 3C: Improve clinical and community services and population health

The vast majority of health care resources focus on clinical interventions, when the vast majority of factors that impact health occur outside of clinical settings. NACCHO recommends an increased focus on public health IT systems, which enable and monitor outcomes from population health interventions that can help achieve the triple aim of 1) improving the patient experience of care, 2) improving the health of populations and 3) reducing the per capita cost of health care. This goal can only be met if population health can be measured objectively, supported by real time access to useable data.

It is important that local health departments become critical partners with providers, hospitals, and Accountable Care Organizations. Local health departments work primarily in health promotion and disease prevention, and are already running programs and offering services to their local communities. Many of the State Innovation Model (SIM) awardees already have local and state health departments assessing a populations health in order demonstrate how health outcomes in a community are changing.

ONC should encourage the collaboration between public providers, private providers, and local health departments to improve care delivery. ONC should also encourage local health departments to partner with their communities, using health IT to coordinate and implement population health management.

Goal 4: Advance the Health and Well-being of Individuals and Communities

Objective 4B: Protect and promote public health and healthy, resilient communities

NACCHO applauds ONC's recognition of the important role that interoperable health information exchange plays in improving public health's ability to promote healthy communities. ONC must also support the expanded use of non-EHR public health IT in order for public health entities to benefit from real time electronic health information for public health surveillance, and other public health related activities. This includes surveillance management systems and countermeasure tracking and delivery systems. ONC should also work with CDC and other partners to develop up to date messaging guides for syndromic surveillance.

NACCHO recognizes the importance of the strategies ONC proposes to meet objective 4B. However, these strategies assume a high level of technical knowledge and skill from all public health agencies, especially local health departments. In many local health departments around the United States, interoperability between internal systems has been challenging. In order for this objective to be met, ONC should encourage policies and make tools and resources available for local health departments to invest in an interoperable health IT system.

Thank you again for the opportunity to provide comments on the proposed Federal Health IT Strategic Plan. This plan will play an important role in improving the public's health and has implications for the interaction between hospitals, providers, and local health departments.

Sincerely,



Robert M. Pestronk, MPH
Executive Director

1 National Association of County and City Health Officials. (2010). *The Status of Local Health Department Informatics* (PP 10-11).