



## Primary Care of the Treasure Coast, Inc.

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Nancy M. Baker, MD

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Dear ONC,

These are suggested changes to the Federal Health IT Strategic Plan 2015-2020.

On Page 10, "Objective 1A: Increase the adoption and effective use of health IT products, systems, and services", I believe it is vital to specifically identify a strategy to "improve and simplify the user experience for EHR's, in order to improve value to users of EHR products." Certification standards must be strengthened to require robust usability testing and user rating. There has been increasing user frustration due to poor human engineering design in EHR products. Users want fewer clicks.

On Page 15, "Objective 2B: Identify, prioritize, and advance technical standards to support secure and interoperable health information", I recommend a strategy which requires data source identification tags to travel with each structured data, thus enabling users to know the source and date of any given informational component (for example, which physician prescribed each medication, who assigned an ICD diagnosis code, are glucose readings direct feed from a device or verbally reported by a patient, etc). Understanding data sources will be increasingly important as interoperability allows for data to be "imported" into a patient's record from a variety of sources.

On Page 18, "Objective 3A: Improve health care quality, access, and experience through safe, timely, effective, efficient, equitable, and person-centered care", I strongly encourage that quality measures be first VALIDATED in pilot programs to prove that the measure leads to improved outcomes. Evidence-based guidelines must be implemented in a way that is also evidence based. We support (not require) provider use of evidence-based guidelines, with clear caveats that customization to fit individual patients will necessarily lead to denominator exclusions. In addition, proposed quality measures should be thoroughly assessed for *value* (how much effort is required to use a measure, which produces how much improvement) before requiring widespread adoption. Lastly, I am concerned that the Strategic Plan nowhere addresses the concept that information technology should be a tool for improved health care, and not its own goal. I strongly believe that the best care for patients is longitudinal care in a *healing relationship*. The contextual relationship between me and my patient is crucial, and EHR's in the exam should facilitate rather than impede this relationship.

Thank you for this opportunity of comment.

Sincerely yours,

Dennis F. Saver, MD, FAAFP