

February 15, 2016

Optum shares the principle that to achieve open, connected care for our communities, we all have the responsibility to take action. To further these goals, we commit to the following principles to advance interoperability among health information systems enabling free movement of data, which are foundational to the success of delivery system reform.

1. **Consumer access:** To help consumers easily and securely access their electronic health information, direct it to any desired location, learn how their information can be shared and used, and be assured that this information will be effectively and safely used to benefit their health and that of their community.
2. **No Blocking/Transparency:** To help providers share individuals' health information for care with other providers and their patients whenever permitted by law, and not block electronic health information (defined as knowingly and unreasonably interfering with information sharing).
3. **Standards:** Implement federally recognized, national interoperability standards, policies, guidance, and practices for electronic health information, and adopt best practices including those related to privacy and security.

Optum applauds ONC's continued efforts to achieve true interoperability in the health care system by forging industry-wide commitment to the basic principles of this important initiative. We believe health care must become a more coordinated and interconnected ecosystem, keeping individuals at the center of their care, while strictly maintaining appropriate levels of privacy and security protection. Optum has demonstrated a longstanding commitment to interoperability, including as a founding member of the Carequality initiative (now part of Sequoia Project), and our ability to drive this commitment into practice across health systems is unparalleled:

- We provide care directly to over 7 million patients, and pharmacy care services to over 66 million people, with networks approaching 17,000 physician partners, 160 neighborhood care centers, 67,000 pharmacies, and 1 million in-home health assessments.
- The Optum One analytics platform provides the industry with sophisticated, targeted and actionable insights into health care quality, total cost of care, and outcomes. Optum One is compatible with and shares data across hundreds of EMR and practice management platforms in a secure environment, integrating billions of data attributes to help over 130,000 clinical and administrative decisions makers improve health care.
- Optum's cloud-based Health Information Exchange and Link platforms securely power over 1.5 billion transactions annually, making clinical and administrative data exchange efficient and transparent for nearly 40 million patients and 600,000 care providers.
- We have invested more than \$700 million over the past 4 years alone into industry-leading data privacy, security, and compliance assets and services.
- We founded OptumLabs, an industry-wide collaborative research and development center to safely and securely combine health care data, information, and ideas to drive innovation that benefits patients today while also driving long-term improvements in the delivery and quality of care. OptumLabs has over 20 research partners including some of the largest and most prestigious academic institutions in the country.

In summary, as a dedicated supporter of ONC's leadership toward greater interoperability, we affirm our commitment to ongoing development of an innovative, interoperable health system that encourages the delivery of safe, cost-effective, and efficient care.

We are also committed to participation in a system that empowers consumers and their providers to use and access their health care information in a secure and efficient manner. Specifically, we will continue to encourage and support:

- Promotion of consistent and effective exchange of health information by leveraging common data standards, encouraging connectivity among stakeholders and prohibiting data blocking.
- Enhancement of patient safety and care by ensuring providers are fully informed in clinical decisions and care planning through ready access to critical patient care data.
- Empowerment of patients to engage more actively in their health care decisions by making relevant data available in an appropriate and desired form.
- Encouragement of health information sharing among providers, health plans, and others involved in a patient's care to improve care coordination and health care quality.