



March 18, 2020

Dear National Coordinator Rucker and the broader team of the Office of the National Coordinator for Health Information Technology,

We thank you for opening the ONC's 2020-2025 Federal Health IT Strategic Plan for public comment. As the creator of two of the industry's leading interoperability platforms — Corepoint and Rhapsody — Lyniate leaders are eager to share our unique company perspective on the ONC's five-year plan. Lyniate partners with healthcare organizations around the globe to address interoperability challenges. Our products are used by thousands of customers — including large IDNs, specialty clinics, payers, vendors, Health Information Exchanges, and other partners — to send hundreds of millions of messages every day.

In general, leaders at Lyniate believe the ONC's five-year plan is a positive path forward for the healthcare industry. The draft contains worthy goals and solid strategies for achieving them. For example, it includes goals to promote health and wellness, improve the experience of care, and create an interoperable infrastructure. It also encourages the use of FHIR, which we believe will help break down barriers between the existing EHR-centric healthcare IT infrastructure and the growing ranks of consumer- and clinical-quality wearable and internet-connected devices in the home.

However, the plan may be too patient-centric in its focus and places much emphasis on giving patients access to and control of their data. While this is a worthy and popularly supported goal, we have concerns about the readability of certain types of clinical data that may be present in a patient's health records.

#### **Defined API Structure with Security at the Forefront**

The five-year plan places an emphasis on the development of a "health app economy." Our areas of concern with this are a lack of guidelines, detailed framework, and the technical thresholds these type of apps would need to achieve to be arbiters of patient data.

APIs can be a powerful force for patients to obtain their data on personal devices. The ability for patients to aggregate their own healthcare data from many different providers and health plans has the potential to transform quality, access, and cost of healthcare. Lyniate encourages the ONC to take the proper steps in addressing the potential for abuse in the health app economy of the future, building in security-centric certification thresholds commensurate with the sensitivity of patient data. We are encouraged to see the ONC prioritizing "patient understanding and control over their data," as creating patient-centered interoperability without empowering the patient with the education and tools to control their data could expose patients to malicious actors looking to obtain PHI.



### **Enforcement**

In its current draft form, the five-year plan has not defined which regulatory and enforcement mechanisms the ONC will leverage to foster a business environment that accelerates adoption of the infrastructure to enable interoperability. Our hope is that the TEFCA and information-blocking draft regulations will be tied to the existing EHR/Provider certification programs. An alternative would be to ensure the final version of the TEFCA rule imposes enforcement mechanisms. This certification would bring a technology-enablement success metric, based around compliance to a common set of technical thresholds. In turn, this would ensure the industry has a greater incentive to adopt interoperability solutions.

### **Private Sector Involvement**

While Lyniate has expressed concern with the ONC's lack of specifics in regard to the security of consumer-facing APIs in the health app economy, we are broadly supportive of the ONC's principle of empowering the private sector, which we believe will be the catalyst for innovation. Because the ONC is casting a broad directive without mandating specific API solutions, it invites innovation from the private sector.

### **Conclusion**

The development of the 2020-2025 Federal Health IT Strategic Plan is an important step in advancing interoperability so that patients and clinicians have access to health data at the point of care, and to make informed decisions. Through this plan, the ONC has the opportunity to unify federal agencies while catalyzing the industry around key pillars of healthcare IT infrastructure for nationwide data exchange. Thank you for the opportunity to comment on this plan.