



## RURAL POLICY RESEARCH INSTITUTE

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Submitted Electronically via <https://www.healthit.gov/topic/2020-2025-federal-health-it-strategic-plan>

RE: Comment on the 2020-2025 Federal Health IT Strategic Plan

March 12, 2020

To Whom It May Concern:

The Rural Policy Research Institute Health Panel (Panel) was established in 1993 to provide science-based, objective policy analysis to federal policy makers. The Panel is pleased to offer comments in response to the proposed 2020-2025 Federal Health IT Strategic Plan. Our comments are limited to rural-specific issues and are structured to parallel questions posed, or issues stated, in the draft plan (not technical comments regarding specific sections of the proposed plan).

The Panel is encouraged by ONC's recognition of the specific challenges facing rural and underserved areas. The Panel agrees that rural areas face particular challenges in term of provider supply, mental health and substance use, and health infrastructure including broadband.

The Panel is generally supportive of the goals and strategies outlined in the plan. A note of caution in moving forward with joint goals to address "rural areas, persons with disabilities, racial and ethnic minorities, and those in areas with low socioeconomic status," as outlined in Goal 1 Objective 1a, is that there may be unintended consequences in designing specific programs to meet laudable goals.<sup>1</sup> For example, if targets are set based on numbers of persons affected across all rural and underserved populations, organizations seeking to meet those goals quickly may do so by focusing on the people and places most efficiently served. Such strategies could leave the hardest to reach populations as the last to benefit. Examples include remote rural places and hard to serve urban places. Since this would be an unintended and avoidable consequence, we recommend program design and ongoing monitoring of plans to reach populations underserved by technological access in remote and hard to reach places.

The Panel appreciates the opportunity to comment on the strategic plan and its goals of improving rural health.

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<sup>1</sup> Mueller, K.J., Alfero, C., Coburn, A.F., Lundblad, J.P., MacKinney, A.C., McBride, T.D., & Weigel, P. (2018). Assessing the unintended consequences of health policy on rural populations and places. Rural Health Policy Research Institute (RUPRI), <http://rupri.org/wp-content/uploads/Evaluating-the-Impact-of-Policy-Changes-on-Rural-Populations-1.pdf>

Sincerely,

The Rural Policy Research Institute Health Panel

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