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October 26, 2017

U.S. Department of Health and Human Services
Office of the Assistant Secretary for Planning and Evaluation
Strategic Planning Team
200 Independence Avenue, SW, Room 415F
Washington, DC 20201

Dear Mr. Graham,

On behalf of the Electronic Health Record Association (EHRA), we offer this response to the request for comments on the “HHS Draft Strategic Plan FY2018 - 2022.” Our more than 30 members serve the vast majority of hospitals and ambulatory care organizations that use electronic health records (EHRs) and other health information technology to deliver high quality, efficient care to patients. The EHR Association operates on the premise that the rapid, widespread adoption of health IT has and will continue to help improve the quality of patient care as well as the productivity and sustainability of the healthcare system.

Our core objectives focus on collaborative efforts to accelerate health IT adoption, advance interoperability, and improve the quality and efficiency of care through the use of these important technologies. We strive to engage the EHR software developer community and other stakeholders regarding EHR and health IT standards development, EHR certification processes and criteria, interoperability, patient safety, EHR usability, privacy and security, electronic performance and quality measures (eCQMs), health IT-focused public policy, and other EHR-related issues that are the subject of increasing government, payer, and provider focus.

We are committed to supporting safe healthcare delivery, fostering continued innovation, and operating with high integrity in the market for our users and their patients and families. The EHR Association brings together software engineers, interoperability specialists, physicians, and other clinicians as health IT professionals with unparalleled experience in designing, delivering, and supporting EHRs and other health IT in healthcare organizations of all sizes and specialties. We believe we are uniquely positioned to provide insights to policymakers to help ensure that health IT

regulations add the greatest value, have the intended effects, are minimally burdensome, and remain responsive to market demands.

EHRA is supportive of the HHS Draft Strategic Plan FY2018-2022 and believes that further efforts by HHS to improve patient care through adoption and utilization of EHRs will contribute to the successful implementation of the five strategic goals identified in the plan. Our comments below include specific issues related to EHRs that we believe HHS should consider during final review and implementation of the strategic plan.

Goal 1: Reform, Strengthen, and Modernize the Nation's Health Care System

Leverage Technology Solutions to Support Safe, High-Quality Care

- EHRA views interoperability as essential to enable data to follow the patient; to assist providers in the coordination of care; and to contribute data to public health, registries, and research to enable a learning health system. We are supportive of efforts to promote implementation of interoperable and functional health information technology to advance clinical care and assist both patients and providers in decision-making.
- To improve interoperability, we recommend adoption of nationally endorsed standards that support essential data access and exchange use cases as a floor, while allowing for deployment of additional, emerging data exchange methods to spur innovation. Private industry has made significant efforts in developing technologies that HHS can leverage. We encourage HHS to facilitate coordination between private initiatives and federal agencies to establish such a core set of nationally endorsed standards.
- EHRA strongly encourages all its members and other stakeholders not to engage in information blocking and requires this commitment by adopters of EHRA's [EHR Developer Code of Conduct](#).

Reduce Provider Shortages in Underserved and Rural Communities

- EHRA is supportive of efforts to improve healthcare delivery through increased access to telemedicine services. Telemedicine offers significant benefits to patients through improved accessibility and cost savings, yet existing regulations have restricted the use of telehealth services for many Medicare patients, limiting the categories of healthcare providers who can use telehealth services, the number of patients who can benefit from telehealth services, and the types of innovative technologies that can be utilized.

Goal 2: Protect the Health of Americans Where They Live, Learn, Work, and Play

Leverage Technology and Innovation Solutions

- EHRA members have significant experience in designing and supporting platforms that enable clinical decision support. We frequently provide comments and use case scenarios, most recently in response to the proposed [FY2018 Medicare Physician Fee Schedule](#), outlining the role EHRs play in supporting clinical decision support and the challenges of implementation.

- We recommend that roll-out and implementation of newly developed, HHS-required clinical decision support tools (e.g. appropriate use criteria) be conducted in close coordination with providers, developers, and regulators to enable readiness and successful deployment of these new functions. This process, to be successful, will require timely guidance from HHS regarding provider obligations, clear communication of standards, and harmonization of clinical-decision support requirements with existing quality-payment program (QPP) requirements.
- It is critical to ensure that clinical decision support platforms utilize transparent guidelines that enable smooth workflow for all parties involved and allow clear communication between both providers and patients.
- With regard to barriers, real or perceived, under the Health Insurance Portability and Accountability Act (HIPAA), we recognize that the inconsistencies in various state and federal privacy laws as they pertain to sensitive health information continue to be obstacles to widespread health information exchange. In addition, these inconsistencies create technical challenges for implementing privacy and security of health systems. We support mechanisms and policy changes that promote and provide a nationwide, privacy-focused legal framework for access and disclosure of personal health information (PHI) based on patient-directed consent.

Goal 4: Foster Sound, Sustained Advances in the Sciences

Facilitate Information Sharing, Exchange, and Alignment

- EHRA supports efforts to harmonize data sharing standards to enable the timely exchange of data among agencies and healthcare providers at the local, state, and federal level. We recommend the adoption of a core set of nationally endorsed standards as a floor that will provide clear and consistent definitions for data sharing and the promotion of unambiguous patient identification methods to enhance the ability to track and share clinical information.
- Efforts to improve data sharing through standards development, testing, and development of guidance should be a coordinated effort between both public and private stakeholders to ensure stability and sustainability of such initiatives.

Enhance and Standardize Public Health Data Collection and Reporting

- EHRs play an important role in enhancing patient safety and leveraging data to improve outcomes and reduce patient risks. Patient safety is a key component of the EHRA-developed EHR Developer Code of Conduct, and EHRA supports engagement with Patient Safety Organizations (PSO).
- Coordination among multiple public and private initiatives (e.g. meaningful use, MIPS, ONC certification, NIST usability, FDA regulation, PSOs, state and Joint Commission reporting) must continue to occur to enhance public health and patient safety and leverage recent innovation in the EHR space, including public health organizations' use of a common set of consistent data exchange standards and models.

Thank you for the opportunity to comment. We sincerely offer our support and expertise to HHS as the Department implements the five strategic goals outlined in the FY 2018-2022 plan.

Sincerely,



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About the EHR Association

Established in 2004, the Electronic Health Record (EHR) Association is comprised of more than 30 companies that supply the vast majority of EHRs to physicians' practices and hospitals across the United States. The EHR Association operates on the premise that the rapid, widespread adoption of EHRs will help improve the quality of patient care as well as the productivity and sustainability of the healthcare system as a key enabler of healthcare transformation. The EHR Association and its members are committed to supporting safe healthcare delivery, fostering continued innovation, and operating with high integrity in the market for our users and their patients and families.

The EHR Association is a partner of HIMSS. For more information, visit www.ehra.org.