June 2, 2016

Karen DeSalvo, M.D.
Acting Assistant Secretary for Health
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
200 Independence Avenue, S.W., Suite 729-D
Washington, DC 20201

Re: Request for Information Regarding Assessing Interoperability for MACRA (HHS-ONC-2016-0008)

Dear Dr. DeSalvo:

On behalf of our 127-member community hospitals, the Kansas Hospital Association (KHA) appreciates the opportunity to respond to the request for information (RFI) on how best to assess progress on achieving interoperability and sharing of health information that the Office of the National Coordinator for Health Information Technology (ONC) included in the April 8 Federal Register.

In the RFI, ONC asks for feedback on the scope of measurement for interoperability, as well as data sources and potential metrics. The agency plans to use the input it receives to guide implementation of a requirement in the Medicare Access and CHIP Reauthorization Act (MACRA) of 2015 that ONC establish metrics to determine whether the nation has met the objective of widespread interoperability.

The Kansas Hospital Association supports the national objective of interoperability and respects the efforts to measure progress. Our members strongly support the creation of an effective infrastructure for health information exchange that facilitates the sharing of data to improve the efficiency and effectiveness of patient care across health care settings. Kansas hospitals view meaningful information exchange as vital to care improvement, as well as to successful implementation of new care delivery models.

**SCOPE OF MEASUREMENT**

In the RFI, ONC proposes to measure exchange and use of electronic health information. The KHA encourages ONC to consider whether the appropriate infrastructure exists to support such exchange. The scope of measurement should be expanded to include whether we have the standards, technology and infrastructure needed to support these goals.

In the 2015 Health IT Supplement to the AHA Annual Survey, 56 percent of the 114 responding Kansas hospitals indicated that they face challenges exchanging data across different platforms, suggesting lack of
standardized approaches. The KHA encourages ONC to establish standards and to assess their readiness for use by providers and educate providers on how they are used in practice. Our hospitals and health systems are sharing information with clinicians and post-acute care providers through access to shared data systems. Although more challenging to measure, it should be considered in ONC’s assessments. The KHA recommends that ONC broaden the scope of data sharing it measures beyond solely data that are exchanged.

DATA SOURCES AND MEASURES
Survey data. ONC proposes to use the American Hospital Association Health IT Supplemental Survey, a physician survey and metrics from meaningful use as core data sources for measuring interoperability. In addition to survey data, ONC suggests using the data reported under the meaningful use program to inform its assessment of interoperability. The meaningful use measures, such as exchange of a clinical summary for transitions of care, do provide some measurement of exchange. Our members indicate, however, that the type of exchange required for meaningful use is still difficult to do, and many physicians and clinicians find that the information they receive does not always meet their clinical needs.

Other provider data. ONC also requested input on whether to use other sources of provider data, such as audit logs, to measure information exchange. The KHA recommends that ONC refrain from considering any new requirements for reporting by providers as a means to measure interoperability. Providers should not be asked to further invest in documenting the extent of exchange at the cost of actually conducting exchange or providing care.

Widespread interoperability. Finally, ONC asks how the agency should best determine whether the nation has achieved “widespread” interoperability. The KHA encourages the ONC to consider our ability to share information that meets clinical and patient needs, given the tools and infrastructure currently available.

Kansas hospitals are committed to moving toward an e-enabled health care system to improve patient care and safety and achieve national goals for improved health. We appreciate the opportunity to share our concerns and comments.

Sincerely,

Tom Bell
President and CEO