

October 23, 2017

U.S. Department of Health and Human Services  
Office of the Assistant Secretary for Planning and Evaluation  
Strategic Planning Team  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

## **RE: HHS DRAFT Strategic Plan FY 2018-2022**

To Whom It May Concern:

On behalf of the CARIN Alliance, I am pleased to submit these comments regarding the HHS DRAFT Strategic Plan FY 2018-2022. We are supportive of the technology recommendations and pleased to see an emphasis on consumers in the Draft Strategic Plan.

### **About the CARIN Alliance**

The CARIN Alliance is a non-partisan multi-sector group of stakeholders representing numerous hospitals, thousands of physicians, and millions of consumers and caregivers. The CARIN Alliance is convened by David Blumenthal, David Brailer, Aneesh Chopra, and former HHS Secretary Mike Leavitt, to unite industry leaders in advancing the adoption of consumer-directed exchange across the U.S. Working collaboratively with government leaders, the group seeks to rapidly advance the ability for consumers and their authorized caregivers to easily get, use, and share their digital health information when, where, and how they want to achieve their goals.

Specifically, we are promoting the ability for consumers and their authorized caregivers to gain digital access to their health information via the open APIs available under MIPS/Stage 3 Meaningful Use (MU) ACI objectives and the use of 2015 Edition CEHRT (applicable also to the open APIs called for in the 2016 21<sup>st</sup> Century Cures law) to have that information sent to any third-party application they choose, consistent as well with HIPAA. With a membership composed of patients and caregiver organizations, health care entities, health information technology vendors and others, the CARIN Alliance is uniquely positioned at the intersection of public and private organizations to advance the development of person-centered, value-driven health care through the adoption of consumer-directed health information exchange.

In summary, we believe the following

- Consumers and their authorized caregivers should easily be able to get, use, and share their digital health information when, where, and how they want it to achieve their goals.
- Consumer-directed exchange supports sharing of personal health information with non-covered entities, which are not regulated by HIPAA and therefore not subject to the same privacy and security rules as providers, plans and clearinghouses.
- One of the most important issues to solve to advance consumer-directed exchange and promote widespread adoption is the ability to remotely identity-proof individuals across health care ecosystems.

**Objective 1.2: Expand safe, high-quality healthcare options, and encourage innovation and competition**

The CARIN Alliance supports Objective 1.2 and is pleased to see the language on line 256 regarding leveraging technology solutions to support safe, high-quality care. In this section, we believe it is important that HHS continues to foster technology that allows for interoperable information flows not just between providers, but also between providers and patients and their family members/caregivers. We believe that patients' access to their electronic health records is essential both for continuity of care and for patients to better self-manage their own care, and believe the language on line 260 supports this. We would like to see HHS consider ways to promote health information technology tools that support patients' autonomous care coordination and shared decision-making with their providers. We support HHS activity to encourage private sector-led initiatives to advance methods for consumer-directed exchange in a seamless and secure way. We also support HHS adopting and encouraging the use of open standards and technologies to advance consumer-directed health information exchange.

**Objective 1.3: Improve Americans' access to health care and expand choices of care and service options**

The CARIN Alliance is pleased to see language in this section on lines 353-354 supporting "design healthcare options that are responsive to consumer demands". As noted previously, focusing on tools that provide consumers a way to directly engage with their own clinical / health information and care is essential, in our view, to advancing interoperability and modernizing the health care ecosystem. The language around testing pilot programs on consumer-driven demand technologies is also something the CARIN Alliance supports. Given our extensive engagement with developers, vendors and technology providers, the Alliance would like to support HHS in any ways it can during these pilot programs.

Thank you again for your consideration of our comments and recommendations. If you have any questions, please feel free to contact us at [ryan.howells@leavittpartners.com](mailto:ryan.howells@leavittpartners.com) or [rachel.urban@leavittpartners.com](mailto:rachel.urban@leavittpartners.com).



Ryan Howells  
Principal, Leavitt Partners  
The CARIN Alliance