



December 15, 2020

The Honorable Joseph R. Biden, Jr.
President-Elect
United States of America
1401 Constitution Avenue, NW
Washington, DC 20230

The Honorable Kamala D. Harris
Vice President-Elect
United States of America
1401 Constitution Avenue, NW
Washington, DC 20230

Dear President-Elect Biden and Vice President-Elect Harris,

On behalf of the [Healthcare Information and Management Systems Society](#) (HIMSS), I offer congratulations on your election as the 46th President and 49th Vice President of the United States of America. We look forward to working with you and your administration on our shared goals for healthcare transformation to achieve the HIMSS mission to reform the global health ecosystem through the power of information and technology.

As a mission-driven non-profit, HIMSS offers a unique depth and breadth of expertise in health innovation, public policy, workforce development, research and analytics to advise global leaders, stakeholders and influencers on best practices in health information and technology. Through our innovation engine, HIMSS delivers key insights, education and engaging events to healthcare providers, governments and market suppliers, ensuring they have the right information at the point of decision. Headquartered in Chicago, Illinois, HIMSS serves the global health information and technology communities with focused operations across North America, Europe, the United Kingdom, the Middle East and Asia Pacific. Our members include more than 83,000 individuals, 480 provider organizations, 470 non-profit partners and 650 health services organizations.

Policy Change to Match Extraordinary System Innovation

Our nation's healthcare ecosystem is at a critical inflection point—addressing the COVID-19 pandemic is the top priority. To be successful, we need a coherent nationwide strategy that can stabilize and mobilize our public health and care delivery systems to vaccinate our population effectively. Health information and technology play a significant role; creating an environment where healthcare stakeholders leverage the power of innovation to ensure equitable access to timely care, to realize the full health potential of every human, everywhere.

As part of the response to the pandemic, the US healthcare system has experienced a dramatic shift in how care is delivered. Built on the foundation of Health IT investments from past administrations and using emergency waivers that freed the ecosystem from unnecessary restrictions, the US has embraced innovation to provide safe care in secure environments. The healthcare ecosystem has made significant resource investments in 2020 across the continuum of care, and future public policy development must keep pace. We need your administration, Congress and the states to take swift action to provide clarity on which innovative policies for such issues as telehealth, remote patient monitoring, privacy and innovation will be permanently changed, so healthcare systems and citizens have all available tools at their disposal to make informed decisions. Any uncertainty

hinders our collective ability to work with patients to accelerate the future growth and modernization of the healthcare ecosystem.

Realizing the full value and potential of health IT can result in advances in biomedical research, improved population health, wellness through disease prevention, early detection of disease, cross-sector data analytics, emergency preparedness, economic opportunity and consumer satisfaction. These functions are essential in appropriately tackling COVID-19 as well as leading to the sustainability of our nation's healthcare system and providing the pathway to improved clinical, financial and operational outcomes far into the future.

As your administration works with Congress and the states to address COVID-19 and provide new opportunities for more comprehensive coverage and access to care, we urge you to prioritize the role that health information and technology can play in enabling these reforms and the value that our community provides. With information and technology at the nexus of healthcare transformation, HIMSS has identified the following health priorities that require immediate action starting in 2021:

- Develop and Implement a Nationwide COVID-19 Strategy Supported by Modern Health Information and Technology Solutions
- Adopt a Permanent Expansion of Telehealth and Remote Patient Monitoring Technologies and Services
- Modernize Our Public Health Data Infrastructure
- Heighten Our Nation's Focus on Health Equity
- Undertake Development of a National Patient Identification Strategy
- Reaffirm Our National Commitment to Expanding Interoperability and Health Data Exchange
- Bolster Our Nation's Cyber Defenses Related to the Healthcare Infrastructure
- Capitalize on Health Information and Technology to Apply Innovations to Care Delivery

Details on HIMSS's public policy priorities follow:

Develop and Implement a Nationwide COVID-19 Strategy Supported by Modern Health Information and Technology Solutions

As the COVID-19 crisis has revealed, health information and technology are key components of any coordinated public health response across federal, state and local governments. Additional federal funding and increased guidance from your administration will help immensely as our nationwide response moves to the vaccine distribution phase.

A coordinated, standardized and uniform federally-led approach for the entire US, rather than different actions and practices across 56 states and territories, would be most helpful to all stakeholders. Our members will be better able to target and leverage the use of health information and technology resources if your administration can drive such a response. A more central role for the federal government ensures that all communities can take part in any vaccine distribution, as such guidance is imperative given how COVID-19 has highlighted grave racial and ethnic health disparities.

Our members are prepared to help by ensuring that health information and technology systems are appropriately positioned to ensure equitable distribution of vaccines. We are working across states to use technology solutions to share vaccine information in a standardized manner among relevant stakeholders, track those who did and did not receive vaccines and report on vaccination rates across communities. In addition, health information systems are integral to fortifying supply chains, including vaccines, testing tools, ancillary supplies and personal protective equipment. Most importantly, we can rely on health information and technology systems to assist the tracking of patient outcomes and any adverse events. Overall, public and private health information and technology systems should be seen as the engines that collect reliable COVID-related data that drive decision-making at the federal level that can, in turn, uniformly advise states, localities, tribal and territorial healthcare, and other stakeholders on the most appropriate responses.

International Engagement and the World Health Organization (WHO) remain a priority as HIMSS sees COVID-19 as an opportunity to reassert US leadership of the global health community and reinstitute collaboration with WHO. The COVID-19 challenges that we are facing here in the US are not significantly different from what governments across the world are contending with and striving to address. Bi-directional exchange of lessons learned as well as model practices with other countries can only serve to enhance our COVID response and learn about models for diagnosing, treating and tracking patients with the virus, as well as the successful health system changes implemented across the globe.

Adopt a Permanent Expansion of Telehealth and Remote Patient Monitoring Technologies and Services

At the beginning of the pandemic, when in-person care was not a safe option, state and federal regulators provided a lifeline to patients and providers by enabling greater use of telehealth and connected health technologies to expand access to care and flatten the infection curve. Healthcare providers made a significant good-faith investment in telehealth tools as part of their comprehensive response to COVID-19. These innovative tools helped ensure patients could continue to receive necessary care in a safe and effective manner, while avoiding unnecessary exposure for our frontline providers, caregivers and health systems.

Over the last several years, our community has developed clear evidence that connected health technologies offer equivalent healthcare quality as well as greater value and convenience, leading to improved health outcomes for patients. Telehealth also advances health equity by removing many barriers to care created by in-person visits and expands access to many underserved communities and individuals in ways never before envisioned.

Our data indicate a substantial willingness among patients, and even a preference, for substituting telehealth for in-person care where clinically appropriate, emphasizing the desire to embrace these tools on a permanent basis. However, the waivers and flexibilities

that made the expanded use of telehealth possible will expire with the end of the current public health emergency (PHE). From HIMSS's perspective, it is vital to retain these policy waivers for telehealth, communication technology-based services and remote physiologic monitoring until Congress can pass legislation that makes these changes permanent.

We support comprehensive efforts by Congress that enable resilient healthcare delivery through greater telehealth and connected health adoption, including granting the Department of Health and Human Services (HHS) authority to make the changes brought about by these waivers permanent. We believe it is time to modernize the outdated policies that have prevented Medicare and Medicaid beneficiaries from taking advantage of telehealth services for the past 20 years. These priorities should include removing geographic restrictions on telehealth; expanding the list of healthcare professionals and care locations who can offer telehealth to their patients; and allowing healthcare professionals to use the full range of connected health technologies to reach and treat patients wherever they are located.

In addition, we continue to encourage Congress and the Federal Communications Commission (FCC) to prioritize funding and improve programs that provide Americans with the infrastructure that supports and expands broadband to underserved rural areas that currently lack coverage. Moreover, we support the creation of local and regional initiatives that bring private partners and healthcare organizations together to expand high-speed broadband networks to underserved and rural areas.

Modernize Our Public Health Data Infrastructure

The COVID-19 pandemic has made clear that our nation's public health data systems at the federal, state and local levels are inadequate to the task of responding to a national health crisis. HIMSS believes it is critical that we take steps to ensure our public health infrastructure has the comprehensive and coordinated surveillance capacity we lack today.

Congress has provided \$550 million in foundational funding for the Data Modernization Initiative (DMI) between Fiscal Year (FY) 2020 appropriations and funding through the Coronavirus Aid, Relief, and Economic Security (CARES) Act. Already, we have seen the Centers for Disease Control and Prevention (CDC) move quickly to invest this money in infrastructure to help in our immediate response and serve us in the long term. CDC has begun targeting investments across three priority areas: data sharing across the ecosystem; enhancing CDC services and systems for ongoing data modernization; and new standards and approaches for public health reporting. By investing in these three areas, CDC is working toward a system that can be scaled nationwide and adapted as needs and technology evolve.

The initial \$550 million in funding for DMI was a critical investment, but it will not be enough to modernize and maintain our public health surveillance system. The House of Representatives passed funding legislation that included an additional \$450 million for DMI, a second essential piece of the foundational investment for the program. We continue to urge Congressional leadership to include these resources in the final FY 2021 appropriations

legislation and to continue sustained investments through regular appropriations. States and localities will not be able to adopt fully upgraded public health data systems with a one-time injection of federal funds.

For the current system to truly evolve, the federal government must commit to long-term funding to complete essential system upgrades both federally and at the state and local levels and annual sustained funding to support ongoing maintenance as technology improves. The Data Elemental to Health campaign advocates for robust, sustained funding for DMI well into the future. We request that your administration prioritize data modernization in your FY 2022 Budget and beyond, starting with \$100 million in funding in FY 2022.

COVID-19 has shown that we need predictable and long-term federal, state and local funding, combined with public-private investments, to improve essential services and bring the country's public health data sharing, reporting and analysis capabilities into the 21st century so we can effectively address 21st century threats. Our ultimate goal must be to support the development of local and regional health and human services data platforms that can share critical community information in order to improve policy decision-making, public health research and evidence-based interventions.

Heighten Our Nation's Focus on Health Equity

HIMSS wants to work with your Administration to assert the importance of equity in any health-related dialogue moving forward—guaranteeing health equity across our ecosystem needs to be at the forefront of any healthcare transformation discussions. For that reason, we launched the [Global Health Equity Network](#) in January 2020 to elevate conversations about access to care and engage in actionable steps displaying the power of health information and technology to improve health equity and support the elimination of health disparities. Our work focused on the power of information and technology to support women and families by reducing maternal mortality rates and eliminating associated racial disparities. Further, how to integrate the social determinants of health into care delivery processes is also integral to any equity discussions and a priority for us in 2021 and beyond.

Undertake Development of a National Patient Identification Strategy

Our country lacks a national strategy to accurately match patients to their health information. This inability to match patients with their records leads to serious quality and safety issues, from medical errors to lost diagnoses, duplicate testing, adverse drug events and other poor outcomes, all at a significant financial cost to our healthcare system. Although the Health Insurance Portability and Accountability Act (HIPAA) called for the creation of a unique patient identifier to address this issue in 1996, for nearly two decades, Congress has banned federal dollars from being used to promulgate a unique patient identifier. A narrow interpretation of this archaic ban has prevented HHS from leading on efforts to advance a national patient identification strategy to the detriment of patients, providers and public health.

The COVID-19 crisis has made clear just how important this issue is—without the ability to match patients accurately to their health information, critical information is lost and individual and public health suffers. The success of our nationwide response to COVID-19 hinges on accurate information. HIMSS is working with Congress to get the ban removed so that our community can move forward with developing a National Patient Identification Strategy. Such a strategy would be committed to improving patient matching to support secure information sharing as part of a broader effort to improve care quality, effectiveness, affordability and safety.

Reaffirm Our National Commitment to Expanding Interoperability and Health Data Exchange

The regulations finalized earlier in 2020 from the HHS Office of the National Coordinator for Health IT (ONC) and the Centers for Medicare & Medicaid Services (CMS) put our healthcare system on a pathway to broader and more meaningful health data exchange as well as greater empowerment of patients with more control over their data. The dates for applicability and compliance with these regulations are delayed to 2021 to ensure that providers and developers could focus on addressing the COVID-19 pandemic, even though more interoperability of clinical data would have helped our nation's COVID response.

We encourage your administration to move forward with fully implementing these regulations as soon as possible, while remaining cognizant of the strain that COVID-19 is placing on our healthcare system as well as the information and technology development, operational changes and training required to carry out these regulations. Expanded interoperability will provide enormous benefits to patients and our broader healthcare system, but we agree that the immediate focus of all stakeholders must be on confronting the pandemic above all other issues.

HIMSS also encourages your administration to foster two-way, individual access to information, and clearly present the value proposition for all healthcare ecosystem participants related to the collection and exchange of data. Such dialogue will better promote the idea of why individuals should demand control over their health information and how health and wellness outcomes improve as data moves effortlessly across the continuum of care.

In addition, HIMSS remains committed to doing its part to push data exchange forward on a global basis and has prioritized our work with the [Global Consortium for eHealth Interoperability](#), as well as collaboration with 30 governments and WHO on the [Global Digital Health Partnership](#).

Bolster Our Nation's Cyber Defenses Related to the Healthcare Infrastructure

As a designated critical infrastructure, healthcare has been identified as the number one target of cybercriminals, bad actors and state-sponsored cyberattacks, a distinction that requires constant vigilance. Following the passage of the Critical Infrastructure Security Act of 2015, the healthcare community began collaborating with other sectors to increase its cyber awareness and readiness.

To that end, the Health Sector Coordinating Council's Cybersecurity Work Group and the National Healthcare Information Security Advisory Council (NH-ISAC) have become national resources for information sharing for both early-warning and threat mitigation strategies. Along with government resources in the Health Sector Cybersecurity Coordination Center (HC3), these entities should receive expanded resources to combat the increasing cybersecurity challenges facing healthcare to ensure that further inequities across provider organizations are not exacerbated.

On a global scale, HIMSS has been working with the International Red Cross and Peace Institute to support of broader cybersecurity protections for healthcare facilities across the globe. As part of our Call to Action, we are imploring governments to develop and embrace a Geneva Convention-like policy for the medical cyber space that is similar to the protections physical facilities receive near combat zones. Earlier this year, we collaborated to call on the United Nations and governments worldwide to extend the protections for healthcare that occur around physical battlefields to cybersecurity, particularly to protect healthcare facilities from attacks by state-sponsored hackers.

Capitalize on Health Information and Technology to Apply Innovations to Care Delivery

Robust health information and technology processes are fundamental to any health system improvements that stakeholders can make to enhance care delivery and healthcare outcomes. We want to work with your administration to expand the use of artificial intelligence (AI)/machine learning (ML) as well as precision medicine as both fields are critical components of the advances possible in care delivery and can further propel our health system in a positive direction. AI/ML and precision medicine require regulatory approaches that foster innovation, growth and engenders trust while avoiding policy actions that hamper their expansion. Ultimately, we want to help your administration encourage further innovation as well as new market entrants in each area that supports and maintains a vibrant innovation marketplace in the US.

We welcome the opportunity to further discuss these issues in more depth. Please feel free to contact [Tom Leary](#), Senior Vice President of Government Relations, at 703.562.8814 or [Jeff Coughlin](#), Senior Director of Government Relations, at 703.562.8824, with questions or for more information.

Thank you for your consideration.

Sincerely,



Harold F. Wolf III, FHIMSS
President & CEO