



March 18, 2020

Office of the National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
Submitted electronically at: <https://www.healthit.gov/topic/2020-2025-federal-health-it-strategic-plan>

Attention: Public Comment 2020-2025 Federal Health IT Strategic Plan

Office of the National Coordinator for Health Information Technology:

Thank you for the opportunity to provide input on the 2020-2025 Federal Health IT Strategic Plan. The Minnesota e-Health Initiative (Initiative) is pleased to submit comments as a public-private collaborative focused on advancing the adoption and use of electronic health records and other health information technology, including health information exchange. A legislatively authorized 25-member Advisory Committee guides the Initiative (see Appendix A). The Minnesota Department of Health, Center for Health Information Policy and Technology, coordinates activities of the Initiative.

The Initiative applauds the federal government's focus on the needs of health ecosystem, but the plan has gaps and is lacking in clearly defined terminology. This results in the exclusion of many necessary partners of the health ecosystem, a limited acknowledgement of the family role in providing care, inability to address health equity, confusion between population and public health, inability to address increasing rates of mental illness and substance use disorders, and limited focus on health literacy and tools for individuals to take action on information. To address these gaps, we recommend the following:

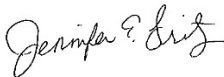
- **Use the term “providers, care teams, and services” in place of the clinical-focused term “healthcare providers”.** This more inclusive term should be defined to include but not be limited to primary and specialty care, long-term and post-acute care, mental and behavioral health, social and human services, dental, pharmacy, and public health. This inclusive term will support health information is available across care settings.
- **Incorporate family needs when addressing the needs of individuals.** Families, such as parents, adult children, or partners, need to have access to information, when consented by the individual, to support care and improve engagement and empowerment. There is a need identify strategies to address the geographical distances between individuals and their families.
- **Add health equity as a federal health principle to assure information and technology is used to advance health equity and eliminate health disparities.** In addition, health equity and health disparities should be defined and factors that influence health acknowledged as

including, but not limited to, race, ethnicity, location, sexual orientation, gender identity and others as identified in the social, psychological and behavioral data of the ONC 2020 Interoperability Standards Advisory. The plan should state and reinforce the idea that all communities and individuals benefit from and are empowered by information and technology that advances health equity and supports health and wellbeing.

- **Accurately define and correctly use the terms public health and population health throughout the plan.** In addition, public health and its needs should be specifically called out and included in the development of the plan and its visuals. Without inclusion in the plan, public health will continue to struggle to meet its information and interoperability needs. This in turn limits its ability to respond to ongoing and emerging health challenges such as the mental health and substance use disorders, COVID-19, and safe drinking water. Public health is provided by federal, state, local, and tribal entities; therefore, each have specific needs to be considered.
- **Acknowledge and address the information and policy needs of mental and behavioral health, alcohol and drug counselors, social and human services, and public health (local, state, federal, and tribal) to address the increase rates of mental illness and substance use disorders.** Without information flowing between these providers, care teams, and services, little can be done address the suicide and drug overdose epidemics facing our communities.
- **Identify strategies to build health literacy and develop tools for action.** It's important that individuals, their families, and communities understand health information and use it to advance health equity and support health and wellbeing. Although this is outside the primary duties and responsibilities of the ONC, working with federal and state partners on health literacy can improve individual, population, and public health and should be addressed in the plan.

Please consider these comments and recommendations related to 2020-2025 Federal Health IT Strategic Plan. They are developed from input from across Minnesota and work of the Initiative. Contact Kari Guida, Senior Health Informatician, Center for Health Information Technology and Policy, Minnesota Department of Health at [kari.guida@state.mn.us](mailto:kari.guida@state.mn.us) with any questions.

Sincerely,



Jennifer Fritz  
Director, Center for Health Information  
Technology and Policy  
Minnesota Department of Health



Peter Schuna  
Advisory Committee Co-Chair  
Minnesota e-Health Advisory Committee  
Chief Executive Officer  
Pathway Health

## Appendix A: Minnesota e-Health Advisory Committee 2019-2020

### Members

**Sonja Short, MD**, *Advisory Committee Co-Chair*, Associate CMIO, M Health Fairview  
Representing: Physicians

**Peter Schuna**, *Advisory Committee Co-Chair*, Chief Executive Officer, Pathway Health Services  
Representing: Long Term Care

**Alan Abramson**, PhD, Senior Vice President, IS&T and Chief Information Officer, HealthPartners Medical Group and Clinics  
Representing: Health System CIOs

**Sunny Ainley**, Associate Dean, Center for Applied Learning, Normandale Community College  
Representing: HIT Education and Training

**Karl Anderson**, Global Digital Health Senior Manager, Medtronic  
Representing: Vendors

**Laurie Beyer-Kropuenske**, JD, General Counsel, Director, Community Services  
Representing: Minnesota Department of Administration

**Jennifer Fritz**, Director, Center for Health Information Policy and Transformation  
Representing: Minnesota Department of Health

**Cathy Gagne**, RN, BSN, PHN, St. Paul-Ramsey Department of Public Health  
Representing: Local Public Health

**Steve Johnson**, PhD, University of Minnesota Academic Health Center  
Representing: Academics and Clinical Research

**George Klauser**, Executive Director, Altair-ACO, Lutheran Social Services  
Representing: Social Services

**Patricia K. Lang**, Consumer Advocate  
Representing: Consumers

**Jennifer Lundblad**, PhD, President and Chief Executive Officer, Stratis Health  
Representing: Quality Improvement

**Bobbie McAdam**, Vice President, Information Technology, Medica  
Representing: Health Plans

**Jeyn Monkman, MA, BSN, NE-BC**, Institute of Clinical Systems Improvement  
Representing: Clinical Guideline Development

**Lisa Moon**, PhD, RN, CEO Advocate Consulting  
Representing: Nurses

**Heather Petermann**, Division Director, Health Care Research & Quality, Minnesota Department of Human Services  
Representing: Minnesota Department of Human Services

**James Roeder**, Vice President of IT, Lakewood Health System  
Representing: Small and Critical Access Hospitals

**Jonathan Shoemaker**, Chief Information Officer, Allina Health  
Representing: Large Hospitals

**Steve Simenson**, BPharm, FAPhA, President and Managing Partner Goodrich Pharmacy  
Representing: Pharmacists

**Adam Stone**, Chief Privacy Officer, Secure Digital Solutions  
Representing: Expert in HIT

**Meyrick Vaz**, Vice President - Strategic Market Partnerships, UnitedHealthcare Office of the CIO  
Representing: Health Plans

**Sandy Zutz-Wiczek**, Chief Operating Officer, FirstLight Health System  
Representing: Community Clinics and FQHCs

## Designated Alternates

**Stacie Christensen**, JD, Acting Director, Community Services Division  
Representing: Minnesota Department of Administration

**Mark Jurkovich**, DDS, MBA, Dentist, Gateway North Family Dental  
Representing: Dentists

**Maiya Kasouaher**, PhD, Community Engagement Lead, Program in Health Disparities Research,  
University of Minnesota  
Alternate Representing: Consumers

**Paul Kleeberg**, MD, Medical Director, Aledade  
Alternate Representing: Physicians

**Justin McMartin**, Senior Product Analyst, Surescripts LLC  
Alternate Representing: Vendors

**James Dungan-Seaver**, Health Information Exchange Architect, PrimeWest Health  
Alternate Representing: Expert in HIT

**Charles Peterson**, President and CEO, The Koble Group  
Alternate Representing: Vendors

**Mark Sonneborn**, Vice President, Information Services, Minnesota Hospital Association  
Alternate Representing: Hospitals

**Susan Severson**, CPEHR, CPHIT, Vice President, Health Information Technology, Stratis Health  
Alternate Representing: Quality Improvement

**Rui Zhang**, PhD, Associate Professor, Institute for Health Informatics, University of Minnesota  
Alternate Representing: Academics and Clinical Research