

September 12, 2014

Dr. Karen DeSalvo
National Coordinator
Office of the National Coordinator for Health IT
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C., 20201

Dear Dr. DeSalvo:

As you know, our nation's health care system is rapidly evolving and health information technology (IT) is foundational to the changes we need to make. Your role as National Coordinator for Health IT is critical, and we appreciate your leadership, as well as your ongoing efforts to facilitate the creation of a health IT infrastructure that supports care models of the future.

The success of our delivery and payment reform efforts depends on how successfully we engage patients, and the meaningful use program has been a critical tool for driving increased patient access to critical health care information. Consumers are increasingly interacting with their physicians and other providers in new and different ways thanks to technological advancements that enable them to easily view and digest their health records, track key health and wellness indicators, communicate with their providers and use their own information to manage their health. We understand that there are many supporters focused on ensuring interoperability amongst providers and this is an important aspect of positively transforming our nation's healthcare system. Equally important to improving clinical quality and ensuring patient privacy and safety is the direct participation of patients in the health care system. By increasing patients' involvement in their own care, we will empower them in ways that contribute productively to accurate information being shared across patients, providers and caregivers.

The Blue Button initiative is a critical component of the federal government's patient engagement strategy. As members of the Blue Button community, we are writing to urge you to further advance the initiative by incorporating Blue Button standards into future meaningful use rulemaking as mandatory standards and certification criteria for certified EHR technology.

Recognizing the potential of Blue Button to engage and empower individuals and their families as partners in their health, the Office of the National Coordinator for Health IT (ONC) became the primary steward of the initiative in 2012. The bottom line is that ONC realized that Blue Button helps achieve the goals of health care transformation.

Since then, ONC has worked in collaboration with a number of public and private entities to encourage adoption and use of Blue Button and its associated technical standards (including the use of the Blue Button "trust bundles"). ONC has convened more than 70 volunteer individuals and organizations to develop guidance and standards through the Standards & Interoperability Framework, cultivated a community of over 500 organizations that have pledged to support Blue Button, developed

communications tools to raise awareness about the initiative, and launched a website that helps patients find their own data online. These efforts have resulted in a robust policy and technical framework that supports scaling of the Blue Button standards through the meaningful use program.

As outlined below, there are a number of compelling reasons for incorporating use of the Blue Button trust bundles into meaningful use criteria.

First, there are critical patient safety reasons for enabling consumers to have access to their own health data in a standardized way and from as many as of the providers that they receive care from as possible. Thousands of preventable medical errors occur each year because providers don't have the information needed to facilitate appropriate and accurate decision-making at the point-of-care. This is a particular challenge for the Medicare population, as the average Medicare beneficiary sees seven providers a year and has 26 encounters with the health care system. In addition to Medicare beneficiaries, all of the populations that we need to prioritize to ensure safer and more cost-effective care face similar complexities.

Second, incorporating Blue Button standards into future meaningful use requirements builds on existing meaningful use certification criteria for Stage 2, including the Direct transport and content requirements. Many of the scalable trust issues associated with provider-to-provider Direct implementation are not present in the consumer-mediated exchange use of Direct, and human and machine-readable formats enable consumers to do everything from printing a physical copy of their records to sharing it with third party applications.

Third, significant progress has been made in creating a process to coordinate use of the Blue Button standards across the health care industry. Working with a number of electronic patient engagement vendors, health information organizations and states, the National Association of Trusted Exchange (NATE) developed draft policies and procedures to enable trusted bidirectional exchange of protected health information between patients and their providers. NATE, a non-profit created to reduce barriers to the appropriate exchange of health information, will be administering Blue Button trust bundles on behalf of the community.

Finally, Blue Button standards can be used to enable patient-to-provider health information exchange, bypassing many of the technical challenges presented by system-to-system interoperability. As recently outlined by ONC, robust system-to-system exchange is approximately ten years away, and interim solutions are needed to facilitate interoperability now.

For these reasons, we believe that ONC should build on its long history of support for Blue Button and incorporate Blue Button trust bundles into meaningful use regulatory criteria. This would provide Americans the means to exercise their right under the new HIPAA omnibus final rule to electronically access their health records and ensure their safety in sharing their records wherever they receive care. This would also set the stage for accelerating the development of new tools and apps that enable patients and their caregivers to engage more fully in their health and health care, bringing the promise of health reform that much closer.

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Thank you in advance for your consideration. We look forward to further dialogue with you, and appreciate ONC's continued support of the Blue Button initiative.

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Accelerate Brain Cancer Cure



Mark Heaney
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Get Real Health



Nora Jean Levin
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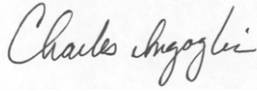


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safe simple sharing

Aaron Seib
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