



May 28, 2024

Micky Tripathi, PhD, MPP

National Coordinator Office of the National Coordinator for Health Information Technology  
Department of Health and Human Services

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Washington, DC 20201

*Submitted electronically via [www.HealthIT.gov/Feedback](http://www.HealthIT.gov/Feedback).*

Dear Dr. Tripathi,

The American Medical Informatics Association (AMIA) appreciates the Office of the National Coordinator for Health Information Technology (ONC) giving the opportunity to comment on the *2024-2030 Federal Health IT Strategic Plan*. AMIA members have been pioneers, innovators, and leading implementors of health information technology (IT). AMIA is a longstanding advocate for promoting innovative, interoperable, and equitable health IT infrastructure since the inception of electronic health information (EHI).

AMIA is the professional home for more than 5,500 informatics professionals, representing frontline clinicians, researchers, public health experts, and educators who bring meaning to data, manage information, and generate new knowledge across the research and healthcare enterprise. As the voice of the nation's biomedical and health informatics professionals, AMIA plays a leading role in advancing health and wellness by moving basic research findings from bench to bedside, and evaluating interventions, innovations and public policy across care settings and patient populations.

Overall, the *2024-2030 Federal Health IT Strategic Plan* is ambitious incorporating actionable, tangible, and aspirational achievements. AMIA applauds ONC's holistic approach to improve experiences and outcomes for health IT users, as well as the policy and technology mechanisms to address their needs.

AMIA's [Public Policy Principles and Policy Positions](#) explains areas where our membership has expertise and can support the Federal Health IT Strategic Plan including:

- Patient Empowerment
- Health IT Safety
- Workforce & Education

- Data Sharing in Research
- Health IT Data Standards & Interoperability
- Informatics-Driven Quality Measurement
- Population & Public Health
- Health Data Privacy
- Artificial Intelligence Principles for Healthcare

The following are comments, recommendations, and resources by AMIA for consideration:

### **Background Information**

When building on previous government and industry progress, AMIA recommends ONC emphasizing and highlighting the complexities of 21<sup>st</sup> Century healthcare data across the healthcare ecosystem that requires creating a federal HIT strategy to manage complex and evolving health care data, much of which is digitalized.

### **Artificial Intelligence**

AI is highlighted in each of the four goals of the *2024-2030 Federal Health IT Strategic Plan* which is expected and needed during this time of rapid development in AI technologies. Given that our membership has decades of experience in real-world experience developing and studying AI, the AMIA has prioritized this topic for several years.

AMIA supports the Strategic Plan's goals for AI with increasing transparency (Goal 2, Objective A and Goal 3, Objective B), promoting safe and responsible use (Goal 2, Objective D), and addressing algorithmic discrimination and bias (Goal 3, Objective C). We did find the need for additions to add further clarity and support.

Under Goal 1, Objective B. Individuals and populations experience modern and equitable health care, the strategy point "*Promote education, outreach, and transparency about the use of artificial intelligence (AI) technologies*" (page 10), AMIA recommends an addition so that the strategy reads as "*Promote education, outreach, and transparency about the use of artificial intelligence (AI) technologies and how these analyses and outputs of these technologies are applied across the healthcare ecosystem*". AMIA believes it is essential to not only understand the technology, but also how it will be applied and used to increase trust in health IT users.

AMIA recommends supporting and promote the use of the NIST [AI Risk Management Framework](#) to achieve the goals and objectives laid out for AI in healthcare.

AMIA has several current AI in healthcare resources for consideration:

- [AMIA's Artificial Intelligence Principles for Healthcare](#). This principle was drafted in 2021 with the goal of encouraging relevant stakeholders to consider the use of AI in healthcare.
- [Defining AMIA's artificial intelligence principles](#), Journal the American Medical Informatics Association. This article defines and provides a rationale for principles that should guide the commission, creation, implementation, maintenance, and retirement of AI systems as a foundation for governance throughout the lifecycle.
- AMIA's [Hill Day Factsheet on Responsible AI in Healthcare](#) from April, 2024.
- Collaborative [one-pager](#), addressing ethical regulation of AI in healthcare, between AMIA and Harvard's Division of Clinical Informatics (DCi). This one-pager is the result of a collaborative [conference](#) between AMIA and DCi held in September 2023. In addition to the conference and the one-pager, AMIA and DCi are in the process of publishing papers diving deeper into AI and real-world evidence, clinical decision making, and consumer health.

### **Documentation Burden**

AMIA commends the *2024-2030 Federal Health IT Strategic Plan's* Goal 2, Objective D. Providers experience reduced regulatory and administrative burden, planning to strategize on how to reduce burden on health care providers. AMIA has the [25x5 Task Force](#) aiming to alleviate the documentation burden on U.S. health professionals. The task force's vision is to reduce this burden to 25 percent by the end of 2026 so health professionals can focus on their patients' needs and ultimately improve health outcomes. The task force has a wide range of expertise structured around four workstreams: Health Professional/Systems, Policy/Advocacy, Impact, Technology Requirements. The 25x5 Task Force would be a great resource for ONC and other federal agencies to collaborate on ways to streamline documentation requirements and provide education and outreach. As a resource, the task force has authored policy briefs on reforms to [reduce documentation burden](#) and [prior authorization](#).

### **Additional Recommendations**

For Goal 1, Objective C. Communities are healthier and safer, AMIA suggests an additional strategy to the objective: *“Develop community-led and community supported rapid response teams skilled at using Health IT (data, sharing, analysis, standardizing) to respond to public health emergencies”*. The strategies to support healthier and safer communities are admirable, but we see a critical need to prepare for public health emergencies to be able to fulfill Objective C.

We are not aware if the order the strategies are listed is by priority. Nevertheless, the strategy, *“Advance standardization and interoperability of social determinants of health data”* for Goal 2, Objective A. Providers deliver safe, equitable, high-quality, and improved care, ONC should consider placing this strategy higher in priority as there is a greater need for Health IT advancement.

AMIA recommends adding another strategy for Goal 2, Objective C. Health care is improved through greater competition and transparency. ONC could consider adding to the strategies *“Leverage health IT to more accurately measure the cost and economics of health care”* and add under So That: *“Interventions that lower costs and improve the quality of care are data driven.”* This strategy would add to improving health care through a holistic approach and support equity.

For Goal 4, Objective A. Development and use of health IT capabilities continues to advance, consider adding to the strategy, *“Establish regulatory standards for safety and efficacy of HIT product used in health care settings that minimize undo and unintended harm.”*

Under Goal 4, Objective E. Communities are supported by modern and integrated U.S. public health data systems and infrastructure, consider adding “as well as HIT products used across the healthcare ecosystem” in strategy *“Support standards and technologies for improved adverse events detection and reporting, and rapid post-market surveillance of approved drugs, vaccines, biologics to drugs, and medical devices”* so that it reads:

*“Support standards and technologies, as well as health IT products used across the healthcare ecosystem, for improved adverse events detection and reporting, and rapid post-market surveillance of approved drugs, vaccines, biologics to drugs, and medical devices”*

Thank you for your consideration of these resources and recommendations. If you have questions, please contact AMIA’s Vice President of Public Policy, Reva Singh, at [rsingh@amia.org](mailto:rsingh@amia.org).