

February 3, 2020

The Honorable Alex M. Azar  
Secretary  
United States Department of Health and Human Services  
200 Independence Ave., SW  
Washington, DC 20201

Dear Secretary Azar:

Thank you for your work to improve the interoperability of health information technology. We support your goal of putting patients in control of their health information.


As integrated healthcare systems, we are the frontline in the delivery of medical care to many millions of patients throughout the nation. We depend on high-quality health information technology to deliver that care, and we value the complex health IT systems that operate seamlessly throughout our various care settings and support us with continued innovation.

While we support HHS's goal of empowering patients with their health data and reducing health care costs through the 21<sup>st</sup> Century Cures Act, we are concerned that ONC's Proposed Rule on interoperability will be overly burdensome on our health systems and will endanger patient privacy. Specifically, the scope of regulated data, the timeline for compliance, and the significant costs and penalties will make it extraordinarily difficult for us to comply, and there is potential for misuse of patient and family member information. We recommend simple, yet highly consequential, changes to the rule:

- **Respect patient and family member privacy:** Health systems should be able to hold companies that want access to patient data to the same privacy and security standards as everyone else in the healthcare industry. Health information about family members should not be used or disclosed by non-HIPAA regulated organizations without family members' knowledge and permission.
- **Standardize data exchange:** The rule should narrowly focus on the medical and financial data that is most useful to the patient and can be exchanged in a standardized format (e.g., USCDI). Non-standardized data should not be required to be exchanged, even if there are existing APIs.
- **Protect EHR developer innovation:** The rule should protect the intellectual property of EHR developers to allow them to continue to innovate for health systems and patients.
- **Create realistic timelines:** HHS should give organizations at least 12 months to prepare before information blocking is enforced and 36 months for development of new technology required by the rule. HHS should allow a grace period for education before fines are levied.

We appreciate your commitment to working to improve healthcare and believe that these changes will help you accomplish that vision.

Sincerely,



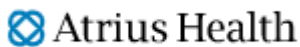
Ken Loving, MD  
CEO  
Access Community Health Centers  
5 clinics in Wisconsin



Ralph Silber  
CEO  
Community Health Center Network  
Alameda Health Consortium  
5 hospitals & 4 clinics in California



Brad Wehe MBA, DPT, FACHE  
CEO  
Altru Health System  
1 hospital & 26 clinics in Minnesota & North Dakota



Steve Strongwater, MD  
President & CEO  
Atrius Health  
32 clinics in Massachusetts



Joyce Newmyer  
President  
Adventist Health Portland  
2 hospitals & 86 clinics in Oregon



David T. Vandewater  
President & CEO  
Ardent Health Services



Bob Williams  
Ardent Division President  
BSA/Harker Heights Division  
19 hospitals & 147 clinics in Florida, Idaho, Kansas, New Jersey, New Mexico, Oklahoma & Texas



Anas Daghestani, MD  
President & CEO



Norman H. Chenven, MD  
Founding CEO  
ARC  
25 clinics in Texas



William Mayer, MD, MPH  
President & CEO  
Affirmant Health Partners  
1000s of independent & employed physicians across the state of Michigan



Ron Stern  
CEO  
Lovelace Health System – part of Ardent  
3 hospitals & 1 medical center in New Mexico



C. Scott Campell, MHA  
Chief Executive Officer  
UT Health Athens – part of Ardent  
Community hospital in Texas



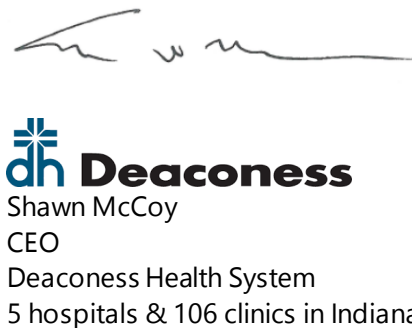
Terence M. Murphy  
President and CEO  
Bayhealth  
2 hospitals & 36 clinics in Delaware



Daniel J Scully  
CEO  
Buffalo Medical Group  
12 clinics in New York



Kenneth L Bilger  
CEO  
Christie Clinic  
28 clinics in Illinois



Shawn McCoy  
CEO  
Deaconess Health System  
5 hospitals & 106 clinics in Indiana



Matthew J. Perry  
President & CEO  
Genesis HealthCare System  
1 hospital & 75 clinics in Ohio



CJ Urlaub  
SVP Strategic Partnership, Integration &  
Care Delivery Niagara County  
President Mount St. Mary's Hospital  
Catholic Health System  
Hospital in New York



Bryan Mills  
President & CEO  
Community Health Network  
8 hospitals & 350 clinics in Indiana



Kevin T. Conroy  
Chairman & CEO  
Specialty cancer diagnostics



Mark Huth  
CEO  
Group Health Cooperative - South Central  
Wisconsin  
6 clinics in Wisconsin



Jag Gill, ScD., FACHE, FACMPE  
CEO  
Charlotte Eye Ear Nose & Throat  
Associates, P.A.  
18 clinics in North Carolina &  
South Carolina



Pete Rutherford  
CEO  
Confluence Health  
2 hospitals & 11 clinics in Washington



William J. Valle  
CEO  
Kidney care in Alabama, Alaska, Arizona,  
Arkansas, California, Colorado, Florida,  
Georgia, Hawaii, Illinois, Indiana, Kansas,  
Kentucky, Louisiana, Maryland,  
Massachusetts, Michigan, Minnesota,  
Mississippi, Missouri, New Jersey, New  
Mexico, New York, North Carolina, Ohio,  
Oklahoma, Oregon, Pennsylvania, Rhode  
Island, South Carolina, Tennessee, Texas,  
Utah, Virginia, Washington, West  
Virginia, Wisconsin, Puerto Rico



Scott Rathgaber, MD  
CEO  
Gundersen Health System  
6 hospitals & 60 clinics in Iowa,  
Minnesota, and Wisconsin



Joseph A. Scopelliti, M.D.  
President & CEO  
The Guthrie Clinic  
4 hospitals and 24 clinics in New York  
& Pennsylvania



Todd LaPorte  
CEO  
HonorHealth  
5 hospitals & 122 clinics in Arizona



Neil Calman, MD  
President & CEO  
Institute for Family Health  
30 clinics in New York



Lynn Britton  
President & CEO  
Mercy  
46 hospitals & 700 clinics in Arkansas,  
Kansas, Louisiana, Mississippi, Missouri,  
Oklahoma, and Texas



Sue Erickson  
President & CEO  
UnityPoint Health – Meriter  
1 hospital & 7 clinics in Wisconsin



Therese Pandl  
President & CEO  
HSHS Eastern Wisconsin Division

Andy Bagnall  
President & CEO  
HSHS Wisconsin  
15 hospitals and 175 clinics in Wisconsin  
& Illinois



Amy McDaniel  
Belmond CEO  
Iowa Specialty Hospital  
2 hospital campuses & 9 clinics in Iowa



Alan Bradford  
President  
Mercy Care  
6 clinics & 5 mobile coach sites in Georgia



Darlene Stromstad, FACHE  
President & CEO  
Mohawk Valley Health System  
2 hospitals & 35 clinics in New York

Chris Brabant, FACHE  
President & CEO  
HSHS St. Clare Memorial Hospital

John Wagner  
President & CEO  
HSHS St. Joseph's Hospital

E.J. Kuiper  
President & CEO  
HSHS Illinois



Michael McDermott, MD, MBA  
President & CEO  
Mary Washington Healthcare  
2 hospitals & 40 clinics in Virginia



Tom Mullen  
President & CEO  
Mercy Health Services  
1 hospital & 10 clinics in Maryland



Vincent G. Capece, Jr.  
President & CEO  
Middlesex Health  
1 hospital & 25 clinics in Connecticut



### Beth Israel Lahey Health

Jeanette G. Clough  
President  
Beth Israel Lahey Health  
Mount Auburn Hospital  
1 hospital & 80 clinics in  
Massachusetts



Douglas M. Silverstein  
President  
Evanston Hospital



Russell F. Cox  
President & CEO  
Norton Healthcare  
5 hospitals & 230 clinics in Kentucky



Robert I. Grossman, MD  
Dean & CEO  
NYU Langone Health  
5 hospitals & 300 clinics in New York &  
New Jersey



Stephen Markovich, MD  
President & CEO  
OhioHealth  
12 hospitals & 430 clinics in Ohio



Michael J. Packnett  
President & CEO  
Parkview Health  
11 hospitals & 178 clinics in Indiana &  
Ohio



Elizabeth Dunne  
President and CEO  
PeaceHealth  
10 hospitals & 104 clinics in Alaska,  
Oregon, and Washington



Lisa LeTexier, RN, BSN  
CEO  
Pembina County Memorial Hospital  
Association  
1 hospital & clinic in North Dakota



John J. Snyder, DMD  
Executive Dental Director & CEO  
Permanente Dental Associates  
20 dental offices in Oregon &  
Washington



Kevin Brown  
President & CEO  
Piedmont Healthcare  
11 hospitals & 117 clinics in Georgia



Mark Eastburg, PhD  
President & CEO  
Pine Rest Christian Mental Health Services  
1 hospital & 16 clinics in Iowa & Michigan



Ashok Rai, MD  
President and CEO  
Prevea Health  
15 hospitals & 175 clinics in Wisconsin



Jerome White  
CEO  
River Valley Primary Care Services  
10 clinics in Arkansas



William B. Downey  
CEO  
Riverside Health System  
8 hospitals & 50 clinics in Virginia



James A. Pfeiffer  
President & CEO  
Self Regional Healthcare  
1 hospital & 17 clinics in South Carolina



Lee Bond  
CEO  
Singing River Health System  
2 hospitals & 18 clinics in Mississippi



Keith A. Hovan  
President & CEO  
Southcoast Health  
3 hospitals & 61 clinics in Massachusetts



Mark A. Wallace  
President & CEO  
Texas Children's Hospital  
4 hospitals & 100 clinics in Texas



Terry Scoggin  
CEO  
Titus Regional Medical Center  
Medical Center in Texas



John M. Carrigg  
President & CEO  
UHS, Inc. & UHS Hospitals  
4 hospitals and 60 clinics in New York



George B. Hernández, Jr.  
President & CEO  
University Health System  
1 hospital & 24 clinics in Texas



Carlos A. Rosende, MD, FACS  
Executive Vice Dean for Clinical  
Affairs, School of Medicine  
Executive Director, UT Health  
Physicians  
13 clinics in Texas



Alan S. Kaplan  
CEO  
UW Health  
3 hospitals & 36 clinics in Illinois &  
Wisconsin



Mark Mantei  
CEO  
Vancouver Clinic  
4 clinics in Washington



Rob Schreiner, MD, FACP, FCCP  
President, WellStar Medical Group  
EVP, WellStar Health System  
11 hospitals & 161 clinics in Georgia



Albert Wright Jr.  
President & CEO  
West Virginia University Health System  
10 hospitals & 300 clinics in Pennsylvania  
& West Virginia

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The following organizations have sent their own letters to the administration:

**Edward-Elmhurst**  
HEALTHCARE

3 hospitals & 57 clinics in Illinois

**HAWAII**  
**PACIFIC**  
**HEALTH** | KAPI'OLANI  
PALI MOMI  
STRAUB  
WILCOX

4 hospitals & 94 clinics in Hawaii

 **MONUMENT HEALTH**

5 hospitals in South Dakota & Wyoming

 **Trinity Health**  
Livonia, MI

94 hospitals & 379 clinics in Alabama, California, Connecticut, Massachusetts, Delaware, Florida, Georgia, Idaho, Oregon, Illinois, Indiana, Iowa, Nebraska, South Dakota, Maryland, Michigan, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Delaware

 **Stormont Vail Health**  
Cotton O'Neil Clinic and Stormont Vail Hospital

1 hospital & 23 clinics in Kansas

**Rady**  
**Children's**  
Hospital  
San Diego 

1 hospital & 80 clinics in California

cc: Joe Grogan, Director, Domestic Policy Council

Paul Ray, Director of the Office of Information and Regulatory Affairs, OMB