



Public Health Data Standards Consortium

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January 18, 2005

David J. Brailer, MD, PhD
Office of the National Coordinator Health Information Technology
Department of Health and Human Services
Hubert H. Humphrey Building, Room 517D
200 Independence Avenue, S.W.
Washington, DC 20201

Ref: PHDSC Response to ONCHIT RFI

Dear Dr. Brailer:

On behalf of the Board of Directors of the Public Health Data Standards Consortium (PHDSC, the Consortium), I am very pleased to submit to you our formal response to the Request for Information (RFI) published by your office in the November 15, 2004 issue of the *Federal Register*, regarding considerations in implementing the President's call for widespread adoption in the United States of interoperable electronic health records (EHRs) within the next 10 years.

Our response, contained in the attached document, was prepared by the PHDSC Committee on National Health Information Network (NHIN) with the involvement and direct input of many of the Consortium members and representatives from the national public health professional organizations and associations, who participated in several conference calls and email discussions. A list of participants is included in the document.

We would like to note in this cover letter a few important points regarding our response:

First, we are very enthusiastic and fully support the framework for strategic action that your office unveiled in July of 2004, in your report to the President "The Decade of Health Information Technology: Delivering Consumer-centric and Information-rich Health Care". We believe that our health care system is in great need of fully adopting and using interoperable electronic health records to improve the quality and efficiency of health care services and enhance population health.

Second, we strongly believe that NHIN should not constrain its initial thrust to the direct provision of health care, to the exclusion of public health. The NHIN must include public health as a full partner in the emerging transformation of our nation's healthcare system through the adoption and use of information technology.

Third, we believe the role of government (federal and state) in this effort should be to continue to promote, facilitate and guide the development of interoperable Electronic Health Record Systems (EHRS). Government should use its health care purchasing power to create the appropriate incentives for providers and health plans to invest in the adoption and use of EHRS. Government should also establish an appropriate regulatory framework that moves the industry in a direction of adopting and using open standards for EHRS.

Finally, we strongly believe that a comprehensive and concerted education effort is needed in order for the industry to move quickly into EHRS. Similar to the HIPAA-related health care administrative standards, we believe that there is a clear need for a high quality, in-depth education and resource center program at the national level to support the successful implementation of the proposed framework. A National Education Program on EHRS and the creation of Regional Resource Centers, with the support of the federal government, should be considered as part of this evolving effort. This education program and the regional resource centers would serve local communities in their need for education and technical assistance to become aware, understand, adopt and fully implement interoperable EHRS.

About the Consortium

The Consortium is a national non-profit, public-private partnership comprised of federal, state and local health agencies, national and local professional associations, public and private sector organizations and individuals dedicated to developing, promoting, and implementing data standards for population health practice and research.

The Consortium is actively involved in promoting the integration of clinical and public health electronic health record systems under the National Health Information Network framework being developed by your office. We are truly taking a leadership role in the EHR development process from a public health perspective. In December of 2003, at the request of the EHR Collaborative we launched the PHDSC Ad Hoc Task Force on Electronic Health Record – Public Health (EHR-PH) to evaluate the HL7 EHR functional model from public health perspectives.¹

This effort engaged 65 representatives from various organizations and was the first opportunity for the public health community to actively participate in national efforts of developing EHR standards for integration of healthcare and public health systems. The validation demonstrated that the HL7 EHR functional model provides a foundation for integration of healthcare and public health services. Participants agreed that “electronic transmission of standardized data from the patient health record to public health agencies via the EHR is essential to support key public health functions and services, and supply public health data repositories.” They also agreed that “adopting the EHR would not only enhance the information, data, and communication systems within the public health infrastructure, but would also increase the capacity of the organizational and system components of the infrastructure”.

¹ Public Health Data Standards Consortium. 2004. Electronic Health Record-Public Health Perspectives. White Paper. PHDSC Ad Hoc Task Force on the Electronic Health Record-Public Health. March 9: 27p. plus 9 Attachments. ULRs: <http://phdatastandards.info> and www.hl7.org/ehr

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We are currently working with the Health Resources and Services Administration's Maternal and Child Health Bureau on the development of the pediatric EHR data standard from public health perspectives². These two projects led to the development of the EHR-PH System Prototype for Interoperability in 21st Century Health Care System that PHDSC and its members will demonstrate at the HL7 HIMSS 2005 Conference in Dallas, TX in February 13-17, 2005. The Consortium also is working with the National Association for Public Health Statistics and Information Systems on a standard HL7 message to transmit birth vital statistics information.

There are many other issues contained in the full text of our response. We hope that the thoughts of the members of the Consortium are useful to you in continuing to give shape to this very important initiative. We look forward to the opportunity to work with your office in addressing any questions you might have, or providing you additional information regarding our formal response to the RFI. We also look forward to participating in the leadership, educational and technical assistance efforts that will make this vision a reality. You can reach me at 410-614-3463 or via e-mail <aorlova@jhsph.edu>.

Sincerely yours,

A handwritten signature in cursive script that reads "Anna Orlova".

Anna Orlova, Ph.D.
Executive Director

Enclosure: PHDSC Response to ONCHIT RFI

² Public Health Data Standards Consortium. 2004. Pediatric Electronic Health Record-Public Health Perspectives. Report to Health Resources and Services Administration, December: 38p. plus 4 Attachments.