



March 25, 2022

Dr. Alondra Nelson
Office of Science and Technology Policy
Executive Office of the President
Eisenhower Executive Office Building
1650 Pennsylvania Avenue
Washington, D.C. 20504

Re: Request for Information (RFI) on Strengthening Community Health Through Technology

Comments submitted via e-mail to connectedhealth@ostp.eop.gov

Dear Dr. Nelson,

Over the past 25 years, athenahealth has built a network of approximately 385,000 healthcare providers in both the ambulatory and acute settings in all 50 states. We provide electronic health record (EHR), practice management, care coordination, patient engagement, data analytics, revenue cycle management, and related services to physician practices and hospitals. More than 140,000 providers utilize our single instance, continuously updated, cloud-based platform. We also support on-premise software solutions. In both hosting paradigms, athenahealth seeks out and establishes connections with partners across the care continuum, enabling our clinicians to improve the quality of care they deliver.

athenahealth currently supports 180 Federally Qualified Health Centers (FQHC) and more than 350 Rural Health Clinics (RHCs). The impact of the COVID-19 pandemic on these communities cannot be understated. The staff and healthcare providers that serve these patients in these communities are on the ground floor of healthcare challenges in our country. They confront issues ranging from access to basic care, broadband internet, and health equity, to complex medical scenarios, all while running a business in a highly complex industry.

It is our experience that the past two years reinforce two important realities in community based health centers; local clinicians understand the needs of their patient community better than anyone else, and when given the resources and flexibility to adapt and innovate, community based health providers regularly exceed expectations for improving public health in a meaningful way.

It is with that context that we offer the following three primary focus areas that the White House Office of Science and Technology Policy (OSTP) should consider at the intersection of improving community health and technology.

First, increasing connectivity and interoperability is the greatest opportunity to improve the experience and outcomes for every participant in the healthcare system.

Patients seek care in multiple settings. Subsequently, there is an ever-expanding amount of patient data points across the care continuum. Staff members in community based health centers spend a significant amount of time tracking down missing paperwork, recently completed labs and tests, and notes from care received in other locations. Additionally, the integration capabilities of many state and regional public health registries leaves much to be desired by providers. Technology must do more than merely transition a manual process from paper to a computer. It should automate processes to free up clinician time to focus on delivering care.

Interoperability is not a technology problem. Limited interoperability remains a business incentive and resource allocation obstacle that Congress has addressed in the HITECH Act and the 21st Century Cures Act. The Administration should continue to let the 21st Century Cures Act rules be implemented and allow time for the market to adapt. Technology vendors and healthcare providers require time to innovate and build. The focus of government in this area should be on breaking down the remaining barriers to information access through rule implementation and addressing bad actors standing in the way of a more connected ecosystem.

Second, virtual care via telehealth audio and video must be a permanent part of the healthcare ecosystem. Virtual care has recaptured the spirit of the physician house call. Telehealth, so long on the verge of becoming mainstream, got a boost from the COVID-19 pandemic, forever transforming the way healthcare is delivered across America. Under the Public Health Emergency (PHE), the current flexibilities and waivers governing virtual care establish telehealth as an irrevocable medium for the doctor patient relationship to flourish. This transformation that puts providers back in the patient's home has become vital for our physician customers and the patients they serve. We are working closely with Congress to ensure that telehealth provisions and flexibilities issued in response to the COVID-19 pandemic remain in place beyond the PHE, and we believe this is a vital tool for all community based health centers.

Specifically, we ask policymakers to harness the collective potential of technology for greater convenience, efficiency, and improved quality of care by promoting a predictable regulatory and reimbursement framework. We strongly support legislation in the House and Senate that would:

- Provide HHS with the permanent authority to waive telehealth restrictions;
- Create an appropriate reimbursement structure for telehealth that compensates providers for their clinical expertise regardless of whether it is delivered on a video call or in person;
- Permanently remove all geographic restrictions on telehealth services;
- Expand originating sites to include the home and other sites; and
- Allow health centers and rural health clinics to provide telehealth services
- Expand access to high-speed broadband internet to improve patient access

Third, community based health centers are still plagued by outdated and administratively burdensome “check the box” requirements. The pace of technological innovation is rapid and these providers have more than proven their

ability and willingness to adapt to meet patient needs. The regulatory environment they navigate is further complicated by regulations with varying and overlapping timelines for implementation. This is all in addition to local regulations, such as navigating state to state requirements for providers serving patients across state lines. We encourage the administration, specifically the CMS Office of Burden Reduction, to act as partners to providers by removing outdated requirements and aligning regulatory program timelines across multiple agencies.

The potential for technology to increase access to care, lower costs, improve outcomes, and address disparities in health equity is without limit if given the proper environment. We look forward to partnering with your office and community based healthcare providers to work towards our shared goals of a better healthcare ecosystem for all. Please do not hesitate to contact me directly at (617) 402-8516.

Regards,

A handwritten signature in black ink, appearing to read 'Greg Carey', written over a horizontal line.

Greg Carey
Director, Government Affairs