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June 8, 2017

The Honorable Roy Blunt  
Chairman, Subcommittee on Labor,  
Health and Human Services, Education  
and Related Agencies  
United States Senate

The Honorable Patty Murray  
Chairman, Subcommittee on Labor,  
Health and Human Services, Education  
and Related Agencies  
United States Senate

The Honorable Tom Cole  
Chairman, House Appropriations Subcommittee  
Subcommittee on Labor, Health and Human  
Services, Education and Related Agencies  
United States House of Representatives

The Honorable Rosa DeLauro  
Ranking Member, House Appropriations  
Subcommittee on Labor, Health and Human  
Services, Education and Related Agencies  
United States House of Representatives

Dear Chairman Blunt, Chairman Cole, Ranking Member Murray, and Ranking Member DeLauro:

With the transition from paper to electronic medical records, the healthcare industry has an opportunity to use health information technology to improve how hospitals share data—known as interoperability—and provide clinicians with new tools to support care delivery. As you consider the President’s fiscal year 2018 budget request for the Department of Health and Human Services (HHS), we urge you to ensure that the agency has sufficient resources to advance these goals. Additionally, the agency should prioritize policies to improve electronic health record (EHR) usability, which refers to the layout of EHRs and how clinicians use them, as poor usability can cause safety risks for patients.

As recently as this last December as part of the 21<sup>st</sup> Century Cures Act, Congress instructed the Office of the National Coordinator for Health Information Technology (ONC) within HHS to implement several new policies—including the development of a program wherein EHR developers submit data on various functions, such as on interoperability and usability. The success of these congressional priorities relies on the agency having adequate resources and prioritizing efforts to enhance patient safety and care quality.

*ONC requires sufficient resources*

Through the 21<sup>st</sup> Century Cures Act, Congress affirmed its bipartisan commitment to ONC’s mission to improve interoperability and usability, and authorized additional appropriations. The 114<sup>th</sup> Congress authorized an additional \$15 million for ONC to implement the new program for EHR developers to submit data on their products.

However, in order to meet Congress’ vision on improvements to the usability and interoperability of EHRs, ONC requires sufficient funding. The President’s proposed budget would cut ONC’s budget by \$22 million, or by more than a third, even though the agency must both maintain many existing programs and implement new authorizations. The President’s budget includes these cuts despite outlining many of the same priorities as Congress—specifically advancing usability and interoperability.

If the proposed budget cuts are enacted, ONC may not have the necessary resources to carry out the entirety of Congress’ priorities for health information technology. As you consider the President’s proposed budget, we urge you to ensure that ONC is sufficiently resourced to improve interoperability and usability, including by implementing the health IT provisions in the 21st Century Cures Act.

*ONC should prioritize patient safety and quality*

Regardless of the level of ONC funding, the agency will need to prioritize its activities. In doing so, ONC should focus on how it can prioritize ways to enhance patient safety and care quality.

For example, as part of the reporting program authorized through the 21<sup>st</sup> Century Cures Act, Congress required ONC to develop a series of measures to evaluate the interoperability and usability of EHRs. One key aspect of usability is patient safety; if the technology is not easy to use or intuitive, then clinicians may inadvertently prescribe the incorrect dose of a medication, miss critical information, or order a test on the wrong patient. When implementing usability-related measures as part of this reporting program, it is critical that ONC ensure that some of the criteria focus on safety.

In developing appropriations bills and associated report language, we urge you to underscore to ONC the need to focus on how EHRs can enhance quality and safety—including as it implements the congressional priorities put forth in the 21<sup>st</sup> Century Cures Act.

*Conclusion*

Congress has a demonstrated record of bipartisan, bicameral support for advancing the interoperability of health information technology and enhancing EHR usability. As ONC faces potentially steep budget cuts put forth in the President's FY 2018 budget, we urge you to ensure that the agency has the resources it needs to meet those goals and to provide explicit direction to prioritize policies that enhance patient safety and care quality as envisioned in the 21<sup>st</sup> Century Cures Act. Should you have any questions or if we can be of assistance, please contact me at 202-540-6333 or [bmoscovitch@pewtrusts.org](mailto:bmoscovitch@pewtrusts.org). Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ben Moscovitch", with a horizontal line underneath.

Ben Moscovitch  
Manager, Health Information Technology  
The Pew Charitable Trusts