



January 4, 2021

Don Rucker, MD
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Re: The Alliance for Nursing Informatics Comments on Information Blocking and the ONC Health IT Certification Program: Extension of Compliance Dates and Timeframes in Response to the COVID-19 Public Health Emergency

Submitted electronically at: <https://regulations.gov/commenton/HHS-ONC-2020-0013-0001>

Dear Dr. Rucker:

Thank you for the opportunity to provide comments on Information Blocking and the ONC Health IT Certification Program: Extension of Compliance Dates and Timeframes in Response to the COVID-19 Public Health Emergency

[The Alliance for Nursing Informatics](#) (ANI), cosponsored by AMIA & HIMSS, advances nursing informatics leadership, practice, education, policy, and research through a unified voice of nursing informatics organizations. We transform health and healthcare through nursing informatics and innovation. ANI is a collaboration of organizations representing more than 20,000 nurse informaticists and brings together 25 distinct nursing informatics groups globally. ANI crosses academia, practice, industry, and nursing specialty boundaries and collaborates with the more than 4 million nurses in practice today.

While we understand compliance deadline extensions within reason, we have concerns about the impact of such delays in advancing interoperability and reducing information blocking. **We recommend that ONC commit to the deadlines proposed in this interim rule, enforce the API requirements, and pledge not to postpone the regulations further into the future.** The timeliness of these regulations is of great importance so that patients and healthcare providers can better access and use health data to improve the safety, quality, and coordination of care. Never has the need for these regulations been greater than right now, as nurses, health care providers and developers work to address the unprecedented COVID-19 Public Health Emergency. In particular the certification requirements for health information technology (health IT) to enhance patients' smartphone access to their health information at no cost through the use of application programming interfaces (APIs) are foundational as we prepare to coordinate a nationwide vaccination campaign to prevent further spread and proliferation of the disease. In addition, we [reiterate our previous recommendations](#) for consideration for the continued advancement of the ONC Health IT Certification Program and efforts to address information blocking, including a call for increased and continued engagement with key stakeholders, including all members of the interdisciplinary healthcare team, as well as patients and caregivers.



ANI applauds the ONCs efforts to foster healthcare innovations for secure and convenient delivery of high-quality information to patients and their providers. **The primary focus of provisions to increase interoperability and reduce information blocking should be improving the public's health, not accuracy and ease of billing.** Significant improvements in safe, timely, effective, and efficient care delivery hinge on **interoperable clinical data for use by the patient, nursing care partners, and all relevant members of the patients' care team.** The ongoing COVID-19 public health emergency has further highlighted the critical importance of access and exchange of information to public health, including immunization data and test results, as patients move across the care continuum. In addition, a strategy is needed to educate and engage with bedside nurses and other bedside providers, as well as patients and their caregivers, on information blocking provisions under conditions of certification and their potential impact.

Nurses have a long history of recognition in a trusted position as health care providers. As the largest segment of the healthcare professions, nurses are uniquely suited to speak as direct stakeholders and patient advocates on the issue of information blocking and translate the benefits of interoperability to their clients.¹ The expertise of nurses should be included in workgroups to address information blocking, interoperability, and health information exchange. ANI member organizations comprise a broad range of nursing specialties. ANI is happy to engage professional nursing experts to advance the proposed interim rule development, addressing information blocking and implementing other 21st Century Cares provisions.

ANI appreciates the opportunity to offer our comments to advance health IT to reduce information blocking and improve interoperability, with broad-ranging implications to the US population's health. We are available and interested in supporting future public responses to these important healthcare issues.

Sincerely

Susan Hull, MSN, RN-BC, NEA-BC, FAMIA
ANI Co-Chair

Nancy J Beale, MSN, RN-BC
ANI Co-Chair

¹ Smiley, R.A., Lauer, P., Bienemy, C., Berg, J.G., Shireman, E., Reneau, K.A., & Alexander, M. (October 2018). The 2017 National Nursing Workforce Survey. *Journal of Nursing Regulation*, 9(3), supplement (S1-S54); For the 17th Year in a Row, Nurses Top Gallup's Poll of Most Trusted Profession," AHA News, January 9, 2019, <https://www.aha.org/news/insights-and-analysis/2019-01-09-17th-year-row-nurses-top-gallups-poll-most-trusted-profession>; Lois Gerber, "Understanding the Nurse's Role as a Patient Advocate," *Nursing*201948, no. 4 (April 2018): 55, <https://doi.org/10.1097/01.NURSE.0000531007.02224.65>.



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