



May 23, 2019

The Honorable Frank Pallone
U.S. House of Representatives
Chairman
Committee on Energy and Commerce
2123 Rayburn House Office Building
Washington, DC 20515

Re: Support letter for the Leading Infrastructure For Tomorrow's America Act" (The LIFT America Act)

Dear Chairman Pallone,

The College of Healthcare Information Management Executives (CHIME) applauds the intent of the Leading Infrastructure For Tomorrow's America Act" (The LIFT America Act), H.R. 2741, to strengthen the nation's healthcare infrastructure. As senior health information technology leaders, we welcome the opportunity to share our perspectives on the importance of investing in the digital and cybersecurity infrastructures of the nation's health systems.

CHIME is a professional organization that represents more than 2,900 Chief Information Officers (CIOs) and other senior healthcare IT leaders. CHIME enables its members and business partners to collaborate, exchange ideas, develop professionally and advocate for the effective use of information management to improve the health and care in the communities they serve. CHIME members are responsible for the selection and implementation of clinical and business systems that are facilitating healthcare transformation through technology. Our members represent some of the earliest and most prolific adopters of electronic health records (EHRs) and other health IT resources for clinicians and patients. Our mission is, "To advance and serve healthcare leaders and the industry improving health and care globally through the utilization of knowledge and technology."

Since enactment of the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH), the healthcare industry has made a significant shift in the way technology is used to treat and engage with patients. The myriad of provisions included in the 21st Century Cures Act present federal regulators and congressional leaders with a unique opportunity to pursue and implement policies to bolster the digital infrastructure that will play a pivotal role in transforming care delivery. Further, the passage of the SUPPORT for Patients and Community Act highlighted the potential for technology to be leveraged to combat the nation's opioid crisis.

Technology adoption and robust data sharing are vital to enhancing the quality of care and efficiency of the nation's healthcare system. The healthcare system has evolved from siloed and paper-based to an interconnected, digital system that provides clinicians with vast quantities of data to make informed decisions. Connected medical devices enable patients to track their conditions or proactively pursue healthier lifestyles. Technologies now allow patients to see clinicians from home or allow clinicians to optimize their time by using telemedicine to monitor

patients off-site in real time. Significant advancements in healthcare technology have been made possible through policy; however, our digital infrastructure, including limited access to broadband and unpatchable systems, threatens the delivery of care and the ability for cutting-edge innovations to proliferate.

Title I—Broadband and Next Generation 911 Infrastructure Subtitle

A. Broadband Internet Access Service Programs

Our members highlight that one significant barrier hindering adoption of telehealth and remote patient monitoring (RPM) by patients and providers alike is broadband access.

A recent Agency for Health Research & Quality (AHRQ) report¹ states, “Rural primary care facilities may also experience challenges implementing health IT or telehealth solutions due to a lack of broadband access. Broadband availability is incredibly important for both providers and patients to use these innovative systems and platforms. According to the Federal Communications Commission's (FCC's) 2016 Broadband Progress Report, 23 million rural Americans lack access to broadband at benchmark speeds. Moreover, individuals and practices in rural areas who do have access to broadband may end up paying three times more for these services than their urban counterparts.” We agree that all of these areas represent barriers. We also see persisting barriers in urban areas and these areas must not be forgotten either. By some accounts approximately a quarter of those living in cities still don't have broadband access either.”

CHIME supports congressional efforts to address broadband access disparities across the nation and applauds the provision in the LIFT America Act to expand deployment of broadband.

Title IV—Health Care Infrastructure

Subtitle A. Hospital Infrastructure

Healthcare is deemed a critical infrastructure by the Department of Homeland Security (DHS) and as such, patient safety and patient data should be viewed as a public good; protecting those things should be a national priority. We applaud your willingness to address the state of healthcare cybersecurity. Cybersecurity attacks are highly disruptive and can be crippling to healthcare entities, as illustrated by the WannaCry and Petya ransomware attacks in 2017. The attacks impacted more than a dozen hospitals and countless other entities spanning the globe, reaching a reported 150 countries.

As we increase interoperability, additional threats to data integrity and patient safety will arise. Without proper safeguards, the safe and secure transmission of sensitive data will continue to be a challenge and will hinder efforts to improve care outcomes. Further, unpatchable or “end-of-life” medical devices have proven to be target for bad actors to disrupt health systems and potentially harm patients.

For most healthcare organizations, margins are tight and capital expenditures are established years in advance. CHIME enthusiastically supports the directive to prioritize projects to improve a health system's cybersecurity infrastructure.

Subtitle B—Indian Health Program Health Care Infrastructure, Subtitle C—Laboratory Infrastructure, Subtitle D—Community-Based Care Infrastructure

¹ “Implementing Medication-Assisted Treatment for Opioid Use Disorder in Rural Primary Care: Environmental Scan Volume 1.” Available at: https://integrationacademy.ahrq.gov/sites/default/files/mat_for_oud_environmental_scan_volume_1_1.pdf

CHIME commends the goal of Subtitles B, C and D to facilitate infrastructure improvements across the myriad of healthcare providers. We encourage the Committee to ensure that “modernization of infrastructure” includes initiatives to improve the digital and cybersecurity infrastructures of care providers in addition to their physical infrastructure improvement needs.

Subtitle E. Public Health Infrastructure

Public health agencies at the federal, state, local, tribal, and territorial levels are actively working with health care providers and the public at-large to detect, report, respond to, and prevent illness and death. Unfortunately, the nation’s public health data systems are antiquated, rely on obsolete information sharing methods and are in dire need of security upgrades.

CHIME applauds the recognition of the important role public health agencies, including the Centers for Disease Control and Prevention (CDC), play in protecting Americans. It is vital that public health entities have interoperable, high-functioning reporting capabilities to ensure their data is timely, accurate and complete.

CHIME commends the committee for your willingness to pursue policies to strengthen the digital infrastructure of the nation’s health system. We hope our comments are useful and look forward to a continued dialogue with the committee regarding legislative solutions for improving healthcare for patients through the use of health information technology. Should you have any questions or if we can be of assistance to the Committee, please contact Leslie Krigstein, Vice President of Congressional Affairs at lkriegstein@chimecentral.org.

Sincerely,



Russell P. Branzell, CHCIO, LCHIME
President and CEO
CHIME



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