American Hospital Association™

Advancing Health in America

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Alex Thai
Networking and Information Technology
Research and Development National Coordination Office
National Science Foundation
2415 Eisenhower Ave.
Alexandria, VA 22314

Re: RFI Response: Action on Interoperability of Medical Devices, Data and Platforms to Enhance Patient Care

Dear Mr. Thai:

On behalf of the nearly 5,000 member hospitals, health systems and other health care organizations, and our clinician partners – including more than 270,000 affiliated physicians, 2 million nurses and other caregivers – and the 43,000 health care leaders who belong to our professional membership groups, the American Hospital Association (AHA) appreciates the opportunity to respond to the request for information (RFI) on medical device interoperability from the Networking and Information Technology Research and Development's Health Information Technology Research and Development Interagency Working Group (HITRD IWG). **The AHA applauds your intention to look specifically at how medical device interoperability can be furthered, and its impact on patient care and safety.**

Together with six other leading national hospital associations, the AHA recently issued a report, **Sharing Data, Saving Lives: The Hospital Agenda for Interoperability** that outlines our joint vision for addressing interoperability. The report identifies the following benefits of sharing data:

- **Strengthened care coordination.** Providers, patients and caregivers can work together to make fully informed care decisions.
- **Improved safety and quality.** Interoperable patient data translates to a better, safer and more efficient experience.
- **Empowered patients and families.** People can make better informed clinical decisions and can become partners in their own care.
- **Increased efficiency and reduced costs.** Information sharing reduces costs in time and resources for patients, insurers, clinical and administrative staff.

- **Robust public health registries.** The sharing of aggregated health information supports more accurate tracking and prevention efforts for disease and other public health threats.

The report specifically highlights the importance of interoperability within the episode of care, including connecting data from medical devices and labs. As noted in your RFI, this is an area of particular concern and challenge. Our report also lays out six pathways to interoperability. While developed to support information sharing more generally, we believe they also apply to the area of medical device interoperability. The pathways are:

- **Security and privacy.** Stakeholders must be able to trust that shared data is accurate, secure, and used in accordance with best practices and patient expectations.
- **Efficient, usable solutions.** Data must be available where and when it is needed, in a useful format that supports accurate patient matching.
- **Cost effective, enhanced infrastructure.** Information sharing networks will require consistent use of standards, semantics and a common set of "rules of the road" for exchange.
- **Standards that work.** Connected systems require improved – as well as new – standards used consistently to minimize proprietary solutions and gatekeeping.
- **Connecting beyond electronic health records.** To improve health and care, interoperable systems must support population health, address social determinants of health and facilitate remote monitoring and patient-generated data.
- **Shared best practices.** All stakeholders should share best practices to build on what works.

Once again, we appreciate your efforts to address the challenge of creating better interoperability connectivity for medical devices. The AHA would be pleased to serve as a resource as the HITRD IWG continues its work on this important issue. If you have any questions or care to discuss further, please feel free to reach out to me at cworzala@aha.org.

Sincerely,

/s/

Chantal Worzala
Vice President
Health Information and Policy Operations