EHI Policy Principles & Priorities

1. **A modern value-based, technology-enabled health care system creates better health care outcomes for everyone.** EHI supports a value-based health care system that enables providers to deliver individualized care when and where patients need it, both in-person and via digital technologies, improve outcomes, and lower costs.
   - **Virtual Care & Remote Patient Monitoring**
     i. Permanently remove Medicare statutory reimbursement restrictions and enhance telehealth options, including:
        1. Geographic and originating site restrictions
        2. Allowing FQHCs and RHCs to be reimbursed for providing telehealth services
        3. In-person visit requirements on telemental health services
        4. Allowing CMS to determine appropriate telehealth providers, services, and modalities
     ii. Promote cross-state provider license portability by incentivizing the adoption of mutual recognition provider licensure compacts
     iii. Increase the accuracy and comprehension of Medicare and commercial provider directories by requiring that they include whether the provider uses telehealth
     iv. Remove barriers to the on-going utilization of remote patient monitoring devices and remote therapeutic services
   - Value-Based Care & Innovation
     i. Digital health and innovation should play a central role as CMS considers new value-based care demonstration programs under their 'strategy refresh', including the use of innovative devices, emerging technologies (AI/ML), and collection and use of SDOH data

2. **Digital health tools can be powerful tools to identify and address health disparities and promote health literacy.** A variety of social and systemic factors have the potential to impact overall and individual health status. Healthcare providers and organizations should have access and effectively use digital health tools to identify and work to mitigate factors that lead to health disparities. Public policy must focus on addressing systemic causes of health inequity and allow health care providers to fully leverage digital health tools to combat individual health disparities faced by their patients. Policies should also seek to ensure these tools do not exacerbate existing or create new biases. Additionally, policy should promote equity in access to digital health tools for both providers and patients and focus on ensuring that the design and implementation of digital health enables all levels of digital and health information literacy to benefit.
   - **Broadband & Connected Devices**
     i. Support access to affordable to connected devices and the high-speed broadband by which they are powered

- **Digital Health Literacy**
    i. Establish funding for digital health literacy programs through FQHCs/RHCs/CHCs
- **Data Collection & Exchange**
    i. Support the development and adoption of health IT standards around the collection and exchange of social determinants of health data

3. **Patient health information should be easily and securely accessed, exchanged, and shared electronically.** EHI supports eliminating the practice of information blocking and allowing for the free and secure access, exchange, and use of health information. In order to advance modern approaches to interoperability, EHI supports the responsible, consistent, and secure use of FHIR-based application programming interfaces (APIs) by all applicable stakeholders to enable effective, authorized access to health data by patients, their authorized representatives, providers, payers, researchers, and others authorized to access such data.
   - **Interoperability**
       i. Support implementation and enforcement of information blocking and interoperability rules, including prevention of proprietary implementation of industry standards, as well as continued education for those subject to regulations
       ii. Support secure, standards-based approaches to interoperability and information sharing across the entire healthcare sector

4. **Patients should be confident that their data is secure and protected – regardless of who controls the data.** EHI believes Congress must pass comprehensive data privacy legislation that reflects how data flows in today's health care ecosystem. The current and developing patchwork of state laws related to privacy is burdensome and harmful to innovation. Congress must act to set the standard at the federal level. Further, we believe federal support for health care cybersecurity efforts are critical.
   - **Federal privacy legislation**
       i. Support comprehensive federal data privacy legislation that meaningfully addresses gaps in legal protections for health data outside HIPAA's coverage
       ii. Support a federal approach to defining rules of the road related to privacy, bias, and excluded uses of personal data for innovative tools such as artificial intelligence and machine learning
   - **Cybersecurity**
       i. The federal government should work with industry partners to strengthen health care cybersecurity efforts, as health care is considered critical infrastructure
   - **Implementation of existing regulations**
       i. Existing regulations that mandate HIPAA covered entities share data with non-HIPAA covered entities should recognize and work to minimize the burden they place on both providers (to educate patients) and patients (to assume inappropriate risk)
       ii. The HIPAA proposed rule should finalized in such a way that increased information sharing doesn't also result in increased risk of privacy violations

5. **Public health systems should be modernized, adequately funded, and consistently maintained.** The COVID-19 pandemic has highlighted the need to modernize current public

health surveillance and reporting systems. EHI supports efforts to promote the electronic sharing of public health information and provide predictable and adequate funding to ensure this goal can be accomplished.

- **Public health modernization**
    i. Monies appropriated for public health system modernization should be used to support ensuring public health systems are interoperable with clinical data sets, allow for the electronic exchange of health information, and improve public health surveillance systems
- **Public health funding**
    i. Restore and protect funding for the Public Health & Prevention Fund