PHiT
PHARMACY HEALTH
INFORMATION TECHNOLOGY
COLLABORATIVE

<u>**Via Electronic Submission to: HealthIT.gov/Feedback**</u>

May 28, 2024

Micky Tripathi, Ph.D., M.P.P.
National Coordinator for Health Information Technology
Office of the National Coordinator for Health
   Information Technology (ONC)
U.S. Department of Health and Human Services
330 C St., SW, Floor 7
Washington, DC 20201

  Re: 2024-2030 Federal Health IT Strategic Plan

Dear Dr. Tripathi:

  On behalf of its membership, the Pharmacy Health Information Technology Collaborative (PHIT) is pleased to submit comments for the draft *2024-2030 Federal Health IT Strategic Plan.*

  PHIT has been involved with the federal agencies, including the Department of Health and Human Services (HHS) Office of the National Coordinator (ONC) and the Centers for Medicare & Medicaid Services (CMS), in developing the national health information technology (HIT) framework for implementing secure access of electronic health information to improve health outcomes since 2010.

  Pharmacists provide essential, patient-centered care services to their patients, including Medicare and Medicaid beneficiaries. Pharmacists use health IT, provider directories, telehealth, e-prescribing (eRx), electronic medical record (EMR)/electronic health record (EHR) systems, and certified EHR technology (CEHRT) to help manage patients' health needs. PHIT supports the use of these systems, which are important to pharmacists in working with other health care providers to deliver longitudinal person-centered care planning, medications used, and transmit patient information related to overall patient care, transitions of care, , medication lists, medication allergies, patient problem lists, smoking status, and social determinants of health (SDOH). Pharmacists also use health IT for reporting to public health agencies (e.g., immunization reporting), clinical decision support services/knowledge artifacts, checking drug formularies checking, and comprehensive medication management (CMM).

Comments

Overall, PHIT is supportive of the proposed federal health IT strategic plan and appreciates that a few of our suggestions were included in the 2020-2025 strategic plan. We have one recommendation for the 2024-2030 strategic plan.

PHIT recommends creating a new goal specifically to address cybersecurity and artificial intelligence (AI) security issues to help thwart cyberattacks (e.g., Goal 5: Protect Health Systems and Health Data from Cyberattacks) rather than placing it at the end of Goal 4. The strategic plan needs to have cybersecurity as a high priority.

Cybercrimes in the United States are increasing at an alarming rate, costing millions of dollars, and show that the U.S. is vulnerable and not adequately prepared to fight them.[1] Targeted victims of cybercrimes include governments (federal,[2] state and local agencies[3]); individuals; businesses, especially health care; etc. Recent attacks, particularly the February ransomware attack on Change Healthcare, the largest health care payment processor in the U.S., disrupted services across the country. "The attack threatened health care workers' paychecks, impacted the ability to fill prescriptions, and even disrupted patient care throughout the health care system."[4] Change Healthcare confirmed at a recent U.S. Senate hearing that it paid hackers a $22 million ransom and "that patient data nonetheless ended up on the dark web."[5]

The proposed federal health IT strategic plan needs to be stronger and show that cybersecurity is a priority. We recommend revising the plan to make cybersecurity a separate goal: "Goal 5: Protect Health Systems and Health Data from Cyberattacks."

The plan does address how cybercriminals may use AI-powered cyberattacks and should. While AI presents great opportunities, it also "lowers the barrier for novice cyber criminals, hackers-for-hire, and hacktivists to carry out effective access and information gathering."[6] The strategic plan focuses on the positive aspects of AI, not the darker side that will be used by nefarious players.

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[1] "The U.S. Is Less Prepared to Fight Cybercrime Than It Could Be," U.S. Government Accountability Office (GAO), August 29, 2023. https://www.gao.gov/blog/u.s.-less-prepared-fight-cybercrime-it-could-be

[2] Sean Lyngaas, "Exclusive: US government agencies hit in global cyberattack," CNN, June 15, 2023. https://www.cnn.com/2023/06/15/politics/us-government-hit-cybeattack/index.html

[3] Sophia Fox-Sowell, "Cyberattacks on state and local governments rose in 2023, says CIS Report," StateScoop, January 30, 2024. https://statescoop.com/ransomware-malware-cyberattacks-cis-report-2024/#:~:text=Cybersecurity-,Cyberattacks%20on%20state%20and%20local%20governments%20rose%20in%202023%2C%20says,increased%20in%20frequency%20last%20year

[4] "The U.S. Now Has a National Cybersecurity Strategy, but Is It as Strong as It Could Be?" GAO, March 21, 2024. https://www.gao.gov/blog/u.s.-now-has-national-cybersecurity-strategy-it-strong-it-could-be

[5] Andy Greenberg, "Change Healthcare Finally Admits It Paid Ransomware Hackers $22 million – and Still Faces a Patient Data Leak," *Wired*, April 22, 2024. https://www.wired.com/story/change-healthcare-admits-it-paid-ransomware-hackers/#:~:text=Updated%2010%3A25%20am%20ET,paid%20%2422%20million%20in%20ransom.

[6] "The near-term impact of AI on the cyber threat," National Cyber Security Centre (United Kingdom), January 24, 2024. https://www.ncsc.gov.uk/report/impact-of-ai-on-cyber-threat

More work needs to be done in this area, and PHIT recommends a separate, more detailed goal be created specifically for cybersecurity and the risks AI poses.

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The Pharmacy HIT Collaborative comprises the major national pharmacy associations, representing 250,000 members. PHIT's membership is composed of the key national pharmacy associations involved in health IT, the National Council for Prescription Drug Programs, and 12 associate members encompassing e-prescribing, health information networks, transaction processing networks, pharmacy companies, system vendors, pharmaceutical manufacturers, and other organizations that support pharmacists' services.

As the leading authority in pharmacy health information technology, PHIT's vision and mission are to ensure the U.S. health IT infrastructure better enables pharmacists to optimize person-centered care. Supporting and advancing the use, usability, and interoperability of health IT by pharmacists for person-centered care, PHIT identifies and voices the health IT needs of pharmacists; promotes awareness of functionality and pharmacists' use of health IT; provides resources, guidance, and support for the adoption and implementation of standards-driven health IT; and guides health IT standards development to address pharmacists' needs. For additional information, visit www.pharmacyhit.org.

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On behalf of PHIT, thank you again for the opportunity to comment on the draft *2024-2030 Federal Health IT Strategic Plan.*

For more information, contact Shelly Spiro, executive director, Pharmacy HIT Collaborative, at shelly@pharmacyhit.org.

Respectfully submitted,

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