



September 3, 2020

Submitted electronically via identity.onc@hhs.gov

Don Rucker, M.D.
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C St. SW, Floor 7
Washington, D.C. 20201

Dear Dr. Rucker:

The Healthcare Leadership Council (HLC) appreciates the opportunity to submit comments to the Office of the National Coordinator for Health Information Technology (ONC) on strategies to improve patient identity and matching efforts.

HLC is a coalition of chief executives from all disciplines within American healthcare. It is the exclusive forum for the nation's healthcare leaders to jointly develop policies, plans, and programs to achieve their vision of a 21st century healthcare system that makes affordable high-quality care accessible to all Americans. Members of HLC – hospitals, academic health centers, health plans, pharmaceutical companies, medical device manufacturers, laboratories, biotech firms, health product distributors, post-acute care providers, home care providers, and information technology companies – advocate for measures to increase the quality and efficiency of healthcare through a patient-centered approach.

Improving health information systems interoperability is an important step in giving patients a greater role in their health decisions. Identifying and matching information with the correct individual is a necessary requirement to build future interoperability efforts. Incorrect patient matching can create duplicative or unnecessary care for a patient, creating unnecessary burdens on patients and the healthcare system. According to a 2018 survey, incorrect patient matching leads to an additional \$1,950 charge to hospitals per patient.¹ Even more significant, incorrect patient matching results in serious safety concerns, such as patients not receiving the proper medications or being treated with incorrect radiation dosages for chemotherapy treatments.²

¹ Jessica Kent, *Patient Matching Issues Increase Costs, Threaten Patient Safety*, Health IT Analytics (April 12, 2018), <https://healthitanalytics.com/news/patient-matching-issues-increase-costs-threaten-patient-safety>.

² *The Impact of Patient Misidentification on Patient Safety*, Imprivata (2016), <https://www.imprivata.com/medical-errors>.

HLC is in favor of a number of strategies to better improve patient identification and matching, such as creating standardized data formats to ensure information is properly collected and stored in the appropriate patient file. In particular, HLC supports efforts to make the U.S. Postal Service (USPS) address standardization tool available to health care providers. Other entities, such as online retailers have access to this information to ensure proper delivery of their products, but providers are currently unable to obtain this tool. Granting providers the ability to use USPS address standardization will help to better match records to the correct patient and create a more complete record.

Additionally, HLC encourages ONC and other public entities to work with private stakeholders in developing additional data standards so patient records can be more uniform and ensure all necessary information is included in these records. HLC believes that efforts to create a unique patient identifier (UPI) would significantly assist these efforts.³ While there is currently a ban on the use of federal funds to create a UPI, the House of Representatives voted to repeal that ban in July 2020 and we support the Senate taking similar action. We hope that ONC will examine these proposals as well as their regulatory authority to encourage future efforts to create a UPI.

HLC appreciates the efforts by ONC to examine challenges to improved patient identification and matching and look forward to working with you on these issues. Should you have any questions, please contact Tina Grande at (202) 449-3433 or tgrande@hlc.org.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary R. Greal".

Mary R. Greal
President

³ Grande et al., *Advancing Interoperability, Information Sharing and Data Access: Improving Health and Healthcare for Americans*, Healthcare Leadership Council and Bipartisan Policy Center (February 12, 2019), <https://bipartisanpolicy.org/wp-content/uploads/2019/03/Advancing-Interoperability-Information-Sharing-and-Data-Access-Improving-Health-and-Healthcare-for-Americans.pdf>, Page 22.