



March 31, 2021

Micky Tripathi, PhD, MPP
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
330 C St SW
Washington, DC 20201

Re: Extension of Information Compliance Dates for Physicians for the Duration of the COVID-19 Public Health Emergency

Dear Dr. Tripathi:

On behalf of the American Academy of Family Physicians (AAFP), representing more than 136,700 family physicians and medical students across the country, congratulations on your new role as National Coordinator for Health Information Technology (IT) and thank you for participating in the recent Health IT Leadership Roundtable. The AAFP looks forward to partnering with you to advance interoperability, reduce administrative burdens, and improve patients' access to their health data.

The AAFP has long supported ONC's efforts to facilitate health data exchange and standardization. The ongoing lack of interoperability across our health system makes it challenging for family physicians to acquire and utilize the health information they need to care for their patients. Patients also struggle to access their own health data. The AAFP recognized these barriers to ensuring high-quality care and partnered with several of our partner organizations to [outline](#) interoperability principles. After the passage of the 21st Century Cures Act, we repeatedly [urged](#) ONC to promulgate interoperability regulations and [commended](#) the agency for taking steps to meaningfully improve health information exchange and patient access.

Throughout the regulatory process, as well as the development of the health IT playbook and educational resources, we had a productive dialogue and provided input to ONC. Additionally, we were grateful for the opportunity to provide feedback on the health IT playbook and other educational resources and look forward to continuing our assistance as needed. Education of our members, and other clinicians, on the recent regulations from CMS and ONC is critical to ease compliance and reduce administrative burden.

For a long time, the AAFP has been a proponent of Application Programming Interfaces (APIs) and a strong supporter of their required adoption by health IT developers. I have also been volunteering within Da Vinci to support further adoption of FHIR APIs between payers and physicians. The AAFP looks forward to our continued collaboration in pursuit of an interoperable health system.

I am also writing to request that the Office of the National Coordinator for Health IT (ONC), through the publication of an interim final rule in the *Federal Register*, further extend the delay in applicability date of information blocking regulations for physicians. The AAFP [previously](#)

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[recommended](#) ONC extend the current delay through the end of the national public health emergency or until July 31, 2021, whichever comes later. Given the recent proliferation of COVID-19 variants and ongoing mass vaccination efforts, this extension is sorely needed to provide relief to family physicians.

Family physicians are on the frontlines of the COVID-19 pandemic and continue to face significant challenges, including financial strain on their practices, staffing shortages, and worsening administrative burden.^{1,2,3} Physician practices do not have the time or financial resources to modify their administrative processes and clinical workflows to ensure compliance with complex information blocking regulations while they continue to respond to the pandemic and provide routine primary care.

The AAFP has been strongly supportive of regulatory actions to prohibit information blocking practices and improve the sharing of data across our health care system. However, we have also repeatedly [raised concerns](#) with the complexity of the exceptions and other requirements physicians must meet to be in compliance with the new information blocking regulatory framework. While we appreciate the resources ONC has developed to educate physicians and other stakeholders, the AAFP is concerned that compliance will require costly and time-intensive legal consultation and practice changes that are infeasible amid this public health emergency. We look forward to working with ONC to minimize the additional burdens these regulations may place on primary care practices.

Thank you again for your interest and early efforts to partner with the AAFP. Should you have any questions, please contact me at swaldren@aafp.org or 913-906-6165.

Sincerely,



Steven E. Waldren, MD, MS
Vice President and Chief Medical Informatics Officer
American Academy of Family Physicians

¹ Larry A. Green Center. Quick COVID-19 Primary Care Survey: Series 21 Fielded September 18-21, 2020. Available at: https://www.pccpc.org/sites/default/files/news_files/C19%20Series%2021%20National%20Executive%20Summary_0.pdf

² Larry A. Green Center. Quick COVID-19 Primary Care Survey: Series 23 Fielded November 13-17, 2020. Available at: https://www.pccpc.org/sites/default/files/news_files/COVID19%20Round%2023%20National%20Executive%20Summary.pdf

³ Larry A. Green Center. Quick COVID-19 Primary Care Survey: Series 25 Fielded January 15-19, 2021. Available at: <https://static1.squarespace.com/static/5d7ff8184cf0e01e4566cb02/t/60241b8a4786500c706e5254/1612979083530/C19+Series+25+National+Executive+Summary.pdf>