Dear Representative Dexter,

On behalf of OCHIN, I appreciate the opportunity to provide comments on HB 3039 A. This bill would require the Health Information Technology Oversight Council, in coordination with stakeholders, to undertake a study and make recommendations to the Legislature regarding two distinct, important, and complex topics: health information exchanges (HIE) and community information exchanges (CIE).

OCHIN is a Portland, Oregon based non-profit community-based, locally controlled health information technology and research network, and committed to promoting high-quality health care in historically underserved communities across the country. OCHIN’s Oregon network members offer primary care, dental, and behavioral health services and had 1.3 million patient encounters in 2020. Considering OCHIN’s experience as a health information technology network in Oregon, we welcome the opportunity to further the dialogue on HB 3039 A for the next legislative session.

OCHIN recommends:

- Leverage national health data standards that support health information exchange and community information exchange as duplicate or conflicting requirements impose a heavy burden on providers in underserved communities and also undermine public health capabilities and research efforts.
- Expanding the stakeholders who should be engaged to include representatives with expertise and experience with health information technology networks serving community clinics in Oregon.
- Clarification that all applicable federal requirements and national standards should be considered to support public health, whole patient care, and social determinants of health as the current language only references the Centers for Medicare and Medicaid Services and
the United States Office of the National Coordinator for Health Information Technology without reference to the HHS Office of Civil Rights (enforcement) nor the Office of the Inspector General (enforcement) or other federal reporting requirements and patient access and exchange by, for example, the Health Resources and Services Agency.

• Submitting stakeholder consensus recommendations to the Legislature to ensure that the benefits and challenges of the policy options identified reflect the strength of a cross-section stakeholders.

We appreciate the opportunity to comment. Please contact me at stollj@ochin.org should you have any questions.

Sincerely,

Jennifer Stoll
Executive Vice President
Government Relations & Public Affairs