

March 23, 2022

Submitted via email to: connectedhealth@ostp.eop.gov

Dr. Alondra Nelson
Acting Director and Deputy Director of Science and Society
Office of Science and Technology Policy
Executive Office of the President
Eisenhower Executive Office Building
1650 Pennsylvania Avenue
Washington, D.C. 20504

Re: Connected Health RFI (87 FR 492)

Dear White House Office of Science and Technology Policy:

Vizient, Inc. appreciates the opportunity to comment on the White House Office of Science and Technology Policy (OSTP) request for information on strengthening health through technology (hereinafter, "RFI"), as many of the topics included in the RFI have a significant impact on our members and the patients they serve.

Background

Vizient, Inc. provides solutions and services that improve the delivery of high-value care by aligning cost, quality and market performance for more than 50% of the nation's acute care providers, which includes 95% of the nation's academic medical centers, and more than 20% of ambulatory providers. Vizient provides expertise, analytics, and advisory services, as well as a contract portfolio that represents more than \$100 billion in annual purchasing volume, to improve patient outcomes and lower costs. Headquartered in Irving, Texas, Vizient has offices throughout the United States.

Recommendations

In our comments, we respond to various questions raised in the RFI. We thank the OSTP for the opportunity to share insights regarding successful models for strengthening community health through digital health technologies, barriers to uptake, trends from the COVID-19 pandemic, user experience, ideas for potential government action and effects on health equity. Vizient notes our interest in continued communications with the White House OSTP regarding future efforts to increase utilization of digital health technologies and to analyze contributory factors leading to health disparities, including options to help address such factors.

Successful Models within the U.S.

Vizient is aware of several instances of community health providers successfully leveraging digital health technology to deliver health care services, enable healthier lifestyles, and reduce health disparities. The [Vizient® Tech Watch](#) informs hospital strategy, supports care delivery, and fuels performance improvement in key high-impact areas: medical devices, pediatrics, and diagnostic imaging.

In addition, although there are numerous digital health technologies in the marketplace today (e.g., digital virtual assistants, patient financial engagement, unified patient messaging, mobile wayfinding, remote patient monitoring), it can be daunting for providers to determine which technologies to invest in or adopt. To help address this concern, a successful model is [Panda Health](#) which was founded by providers and vets digital health technologies and also helps in sourcing, implementation and management of digital health solutions.

Also, in recognition of the challenge of identifying the role each organization should play in addressing social determinants of health (SDoH), Vizient developed a [three-part framework](#) to help hospitals and health systems determine how they are best positioned to help impact the patients and communities they serve. This framework, which can be utilized broadly and uses different metrics for each of the three parts, focuses on addressing the clinical manifestations of SDoH.

Barriers

Vizient's members have noted that a substantial barrier to the use of digital health technologies is the lack of reimbursement clarity and predictability. During the pandemic, significant legal and regulatory changes (e.g., easing of Medicare geographic telehealth restrictions) improved the ability to facilitate broader access to digital health. Yet, the future of these flexibilities is unclear, making it difficult for health care providers to develop and implement longer-term digital health strategies. Further, uncertainty regarding other payer policies is also a barrier to adoption.

Also, additional time is often needed develop and implement an organization's digital strategy, including training providers on the use of digital technologies, identifying technology solutions, altering workflows and creating a robust data and analytic infrastructure. Other barriers include access to broadband infrastructure/reliable internet bandwidth and the need to streamline technology platforms while continuing to prioritize privacy and security protection.

Trends from the Pandemic

Through the use of Vizient solutions like the [Clinical Data Base](#) (CDB), [Operational Data Base](#) (ODB) and the Association of American Medical Colleges and Vizient's [Clinical Practice Solutions Center](#) (CPSC), we have deep insights regarding a range of trends from the pandemic, including how the use of telehealth has changed over the course of the pandemic. For example, in April 2021, Vizient published "[Effects of the COVID-19 Pandemic on Telehealth](#)", which provided an update regarding telehealth utilization based on specialty and payer type, among other variables. In addition, Vizient's CDB has been used by researchers for a variety of purposes, including to learn more about COVID-19. One example includes a peer-reviewed article, "[Outcomes of COVID-19 adults managed in outpatient versus hospital setting](#)", where aggregated, deidentified discharge records of adults with a diagnosis of COVID-19 between March 1, 2020 and January 31, 2021 were reviewed. Data analysis was performed on inpatient and outpatient management to better understand hospitalization rates and associated outcomes measures (e.g., rate of hospitalization, mortality). Vizient welcomes the opportunity to share more information with the OTSP regarding the latest trends from the pandemic.

Tools and Training Needs / Health Equity

Although health equity continues to be a priority, the connection between underserved populations and the issues surrounding their needs, is often fragmented and disconnected. Based on this gap, Vizient developed the [Vizient Vulnerability Index](#) (VVI), which serves as a singular clinical data index for social needs at the neighborhood level. The VVI helps quantify the direct relationship

between obstacles patients face in accessing care and patient outcomes personalized to their communities. Vizient welcomes the opportunity to share more detail about the VVI with the OSTP.

Proposed Government Actions

Vizient urges the Federal Government to consider opportunities to work with private sector stakeholders to ensure tools are available to support the transformation of community health settings through the uptake of innovative digital health technologies and telemedicine at the community level. Vizient has found that health care providers are increasingly interested in partnering and starting digital health solutions regarding consumer engagement and activation, patient assessment and intervention and patient monitoring and management. More information regarding these initiatives is available through Vizient's [VentureSprout podcast](#). Vizient encourages the OSTP to consider opportunities to provide grants to health care providers and community health programs to support further transformation of community health through digital health technologies.

In addition, as noted above, the VVI is one tool that was created specifically to examine social needs data at the neighborhood level. As the OSTP considers options to strengthen community health, it is critical that such efforts can be effectively tailored to community needs, including assessment of digital readiness (e.g., digital literacy, patient's preferred model for communicating or accessing information, comfort with accessing digital solutions) for the community. Also, it is important that best practices in utilizing virtual platforms for connecting patients with community-based resources be shared. Finally, Vizient recommends that the government consider utilizing solutions like the VVI to help plan and measure the impact of solutions on social needs.

Conclusion

Vizient welcomes the OSTP's goal to identify opportunities to optimize digital health to improve community health. We are dedicated to providing innovative, data-driven solutions and expert and collaborative opportunities that lead to improved patient outcomes and lower costs, and we welcome the opportunity to further discuss Vizient's findings and capabilities with the OSTP.

Vizient membership includes a wide variety of hospitals ranging from independent, community-based hospitals to large, integrated health care systems that serve acute and non-acute care needs. Additionally, many are specialized, including academic medical centers and pediatric facilities. Individually, our members are integral partners in their local communities, and many are ranked among the nation's top health care providers. In closing, on behalf of Vizient, I would like to thank the OSTP for providing us the opportunity to respond to this RFI. Please feel free to contact me, or Jenna Stern at jenna.stern@vizientinc.com, if you have any questions or if Vizient may provide any assistance as you consider these issues.

Respectfully submitted,



Shoshana Krilow

Senior Vice President of Public Policy and Government Relations
Vizient, Inc.