



A driving force for health equity

Submitted via electronic mail

April 18, 2023

The Honorable Elizabeth Steiner
Co-Chair, Ways and Means
900 Court St NE State Capitol
State Capitol, S-213
Salem, OR 97301-4042

The Honorable Tawna Sanchez
Co-Chair, Ways and Means
900 Court St NE
State Capitol, H-273
Salem, OR 97301-4042

Re: Comments on SB 966

Dear Chairs Steiner and Sanchez,

On behalf of OCHIN, I'm writing to offer comments and input on SB 966. While OCHIN wholeheartedly supports the intent of the bill as it relates to improving the collection and use of sexual orientation and gender identity data (SOGI), we find that certain changes recently adopted into the engrossed version will reduce data interoperability and increase reporting complexities, as the bill omits the requirement to align with federal ANSI standards. OCHIN advocates for uniform, national digital data and technical standards to reduce burden on patients and providers of multiple, varied data collection requirements and the need to align regionally and nationally to support public health.

OCHIN is an Oregon-based national nonprofit health information technology innovation and research network of locally controlled community health providers that offers technology solutions, informatics, evidence-based research, and policy insights. **In Oregon, OCHIN network members serve more than 590,000 active patients who had more than 2.4 million visits in 2022.** For more than two decades, OCHIN has advanced health care solutions by leveraging the strength of our network's unique data set, as well as the practical experience of our members, to drive technology innovation for patients and providers in rural and other underserved communities.

OCHIN is committed to driving the widespread development, testing, and adoption of national digital data standards that support interoperability and the suitability of health data for a full range of uses in health care and public health. National data standards are the foundation needed to improve the quality of care, bend the cost curve, and empower patients, while paving the way for payment and delivery transformations, particularly for community-based providers that do not have the resources to comply with varied local, regional, state, and national standards. Further, widely adopted national standards are essential to address structural inequality in health care as well as to mount timely, data-driven responses to public health emergencies. Reducing complexity and duplication not only decreases costs and resource needs but can facilitate solutions that address clinician cognitive fatigue and can contribute to streamlined clinical practice that are critical to address workforce challenges.

It is for these reasons that OCHIN urges the Committee to amend SB966 to ensure OHA is required to adhere to and utilize national data and technical standards for the collection of health information. Allowing OHA to establish its own, unique set of rules will further complicate the already difficult reporting requirements faced by providers.

In addition, federal work on data standards like the U.S. Core Data for Interoperability (USCDI) is moving apace, and we are concerned this bill could undermine efforts to move interoperability and standardization forward. Interoperability and standardization are critical to support public health readiness and mitigation and sentinel capabilities in addition to research and movement to new payment models. While we commend the positive intentions of this legislation, we are concerned that this version removes alignment with federal standard. Please contact me at stollj@ochin.org if we can provide any additional information on this critically important topic.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer Stoll". The signature is cursive and fluid.

Jennifer Stoll
Executive Vice President
External Affairs