



Center for Digital Health  
Innovation (CDHI)

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February 18, 2020

The Honorable Alex M. Azar II  
Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue SW  
Washington, D.C. 20201

**Re: The Nation Needs Them Now: HHS's Proposed Regulations to Implement 21st Century Cures Act's Requirements on Interoperability, Information Blocking, and Application Programming Interfaces (RIN 0955-AA01)**

Dear Secretary Azar:

The University of California, San Francisco, joins the call of health systems, patient advocates, health plans, some EHR vendors, researchers, and innovators nationwide that have reviewed ONC's proposed regulations and support their release and implementation now.

We support the proposed regulations because open, standardized API access to health data will help patients and providers manage care more effectively and achieve better health outcomes.

Three years after the 21st Century Cures Act, the proposed regulations take a crucial step forward for nationwide interoperability and health care by requiring open, standardized application programming interfaces (APIs) for patient and population services. APIs and apps underpin our ability today to connect data, knowledge, and action seamlessly across so many walks of life, including social services, government services, banking, education, commerce, and transportation. Achieving nationwide interoperability and electronic information exchange in health care likewise depends upon standardized APIs.

We recognize that important issues and work remain, and have offered in our [comment letter](#) recommended changes that we hope the final regulations will adopt. One key issue is ensuring the privacy and security of health data that patients transmit to, and use with, their third-party health apps. Many stakeholders, including UCSF, are working to implement solutions which do not dictate or restrict patients' choices to share their health data with third-party apps in order to track and manage their health care more effectively. Patients are demanding this access and use, and the proposed regulations are essential to providing it.

The University of California, San Francisco, is a worldwide leader in health care delivery, discovery, and education. Our medical centers consistently rank among the

nation's top hospitals according to U.S. News & World Report. We know and cover the full continuum of health care, with access to patient- and population-level data on myriad disease conditions and demographics, and work to solve real and important problems at national, regional, and global levels. We bring the depth and breadth of our real-world experience to our judgment here that the proposed regulations provide critical advances and should be implemented for the benefit of providers and patients alike.

The nation needs ONC's proposed regulations, and UCSF strongly supports their release and implementation.

If we can help you achieve these national imperatives, or if you have any thoughts or questions, please contact Mark Savage at [Mark.Savage@ucsf.edu](mailto:Mark.Savage@ucsf.edu).

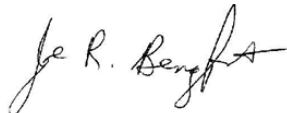
Sincerely,



Mark Laret  
President and Chief Executive Officer  
UCSF Health



Michael Blum, MD  
Associate Vice Chancellor, Informatics  
Director, Center for Digital Health Innovation



Joe Bengfort  
Chief Information Officer  
UCSF and UCSF Health

cc: The Honorable Mick Mulvaney, Director, Office of Management and Budget  
Donald Rucker, National Coordinator for Health Information Technology