

# Centers for Medicare & Medicaid

**Response to:**  
Request for Information  
Document ID: CMS-2025-0050-0031

**Health Technology Ecosystem**



June 16, 2025

Department of Health and Human Services  
Centers for Medicare & Medicaid Services

Dear CMS Team,

Dell Federal Systems L.P. ("Dell Technologies" or "Dell") appreciates the opportunity to submit this response to the Department of Health and Human Services Centers for Medicare & Medicaid Services Request for Information (RFI) CMS-2025-0050-0031 regarding the Health IT Ecosystem.

Dell looks forward to continuing its partnership with CMS in developing innovative solutions that support the strategic vision of the agency. If you would like any additional information, please do not hesitate to contact Frank Ratel, Account Executive for CMS, at 1-410-961-1386 or [Frank\\_Ratel@Federal.Dell.com](mailto:Frank_Ratel@Federal.Dell.com).

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# Table of Contents

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**Why Dell Technologies.....1**  
Dell Technologies ..... 1

**Health IT Ecosystem Response.....2**  
E. Technology Vendors, Data Providers, and Networks .....2  
1. Ecosystem.....2  
3. Technical Standards and Certification .....2

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## Why Dell Technologies

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### Dell Technologies

Dell Federal, coupled with The Dell Technologies Global Transformation Office (GTO) provide digital transformation strategies and execution for key Federal, Civilian and Commercial clients.

We create comprehensive, integrated technology solutions across the Dell and Dell partner ecosystem to achieve measurable outcomes, scalable efficiencies, enhanced security, resilience, cost controls and organizational efficacy via technology. Our industry experience, long-term partnerships with our Federal clients is evident in the scale and variability of the complex solutions we deliver.

Our approach includes:

- 100% contextual awareness of the Agency's mission, short- and long-term objectives
- Understanding key business challenges, goals, and objectives
- Defining business outcomes and KPIs
- Documenting the current operational state and defining the future operational state
- Designing and implementing solutions that align with the key business outcomes, KPIs, and logistical considerations (time to go-live), and elevated tier-1 support.

The Dell Transformation Framework focuses on multiple areas of import: Data & Applications, Technology and a Sovereign, Secure Operating Model. These areas must be managed together as changes in one can impact the others. The framework guides our customers in developing a clear IT vision and architecture, making operational decisions, determining application workload placement, leveraging automation and integration, maintaining a scalable common operating model, and ensuring integrated sovereign security and management while properly leveraging Artificial Intelligence to augment and automate agency capabilities.

Our understanding of CMS's IT transformation desired outcomes includes but are not limited to:

- Lower costs by reducing expenses related to outdated systems and improving IT efficiency.
- Enhance customer service by making CMS's services more accessible and efficient through comprehensive online digital platforms and artificial intelligence augmentation services.
- Leverage next generation technologies to help improve business processes and outcomes.
- Empower the broader organizational workforce with better tools and systems to enhance their effectiveness.
- Lower costs associated with IT infrastructure and operations.
- Enhance the reliability and resiliency of IT systems to minimize the operational impact during technical failures or cybersecurity.

To achieve these outcomes, Dell and its partners will assist CMS in transitioning to next generation open technology architectures, refine and leverage the capabilities of today's multi-cloud ecosystems to control, and reduce cloud spend, enhance employee experience, and improve customer satisfaction via the precise use of artificial intelligence powered digital assistants.

By leveraging Dell's experience in driving human centric satisfaction in the digital workspace across a wide variety of Federal and commercial organizations, Dell will empower CMSIT and CMS workforce employees with best-in-class productivity and security solutions. Dell's framework driven approach is vendor agnostic, starts with the end in mind, and leverages our global change & adoption management team to take a pragmatic approach, ensuring faster adoption, and a higher level of efficacy in operations while controlling and lowering cost.



## Health IT Ecosystem Response

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### E. Technology Vendors, Data Providers, and Networks

#### 1. Ecosystem

**TD-1. What short term (in the next 2 years) and longer-term steps can CMS take to stimulate developer interest in building digital health products for Medicare beneficiaries and caregivers?**

Incorporate and democratize advanced digital tools and tool creation capabilities.

Release high-value datasets, improve developer onboarding, and organize challenges/hackathons. Dell's scalable platforms support rapid development and secure, sovereign deployment of key digital assets.

**TD-2. Regarding CMS Data, to stimulate developer interest –**

Medicare Advantage care data and care plans, imaging, determinant of health matrix data, and real-time adjudication data.

**a. What additional data would be most valuable if made available through CMS APIs?**

Imaging/report meta-data, care plans, determinants of health matrix data, procedural details.

**b. What data sources are most valuable alongside the data available through the Blue Button 2.0 API?**

Medicaid, commercial payer, device-generated IoT biodata.

**c. What obstacles prevent accessing these data sources today?**

Data harmonization and siloed endpoints. Dell's unified platforms help address this through advanced data platforms and artificial intelligence augmented capabilities.

**d. What other APIs should CMS and ASTP/ONC consider including in program policies to unleash innovation and support patients and providers?**

Prior authorization and provider engagement APIs.

#### 3. Technical Standards and Certification

**TD-4. How can CMS better encourage use of open, standards-based, publicly available APIs over proprietary APIs?**

Mandate and incentivize FHIR, SMART, and other recognized standards. Dell simplifies the deployment and scaling of such APIs.

**TD-5. How could a nationwide provider directory of FHIR endpoints improve access to health information for patients, providers, and payers? Who should publish such a directory, and should users bear a cost?**

Streamlines data sharing and onboarding; Dell's platforms securely host and scale such directories cost-effectively.

**TD-7. To what degree has USCDI improved interoperability and exchange and what are its limitations?**

USCDI delivers strong baseline, but additional classes like social determinants / behavioral health are needed. Dell's systems are designed to adapt to expanding data models.

**TD-9. Regarding certification of health IT:**

**a. What are the benefits of redefining certification to prioritize API-enabled capabilities over software functionality?**

Improves modularity, flexibility, and alignment with interoperability goals. Dell's solutions are designed for these needs.

**b. What would be the drawbacks?**

Uniform data quality and security enforcement may be more complex.