



www.tiaonline.org | 10 G Street, NE, Suite 550
Washington, DC 20002

Tel: +1.202.346.3240
Fax: +1.202.346.3241

April 9, 2010

Office of the National Coordinator for Health Information Technology
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Re: RIN 0991–AB59

The Telecommunications Industry Association (TIA) hereby submits its comments on the Office of the National Coordinator's (ONC) proposed establishment of certification programs for Health Information Technology (Health IT).¹ TIA appreciates the steps the ONC is taking to ensure that eligible professionals and hospitals can swiftly adopt and implement certified Electronic Health Record (EHR) technology in order to qualify for meaningful use incentive payments.

As TIA has stated, it is crucial that meaningful use standards include the wired and wireless transmission of EHRs to all forms of health care entities, including hospitals, homes, assisted living facilities, critical care centers, clinics, first responders, social workers, and other care providers to support data-driven collaborative medical care teamwork and interaction through fixed and mobile communications devices. Such transmission will require standardization of networks designed for the electronic exchange of health information.

TIA lauds the ONC for recognizing that Congress authorized it to establish voluntary certification programs for HIT beyond EHRs in order to fulfill its mission.² TIA believes the permanent certification program needs to address the implementation and use of EHR modules in telecommunications operating environments in order to make sure the benefits of meaningful use extend to rural and underserved communities and serve telemedicine applications. To that end, TIA recommends that the permanent certification program addresses the certification and testing of EHR modules across mobile and portable information and medical device platforms. In this way, ONC can help more of the U.S. population to participate in and benefit from the advances in Health IT in the locations and environments that best suit individuals' medical needs.

¹ Establishment of Certification Programs for Health Information Technology, 75 Fed. Reg. 11328 (proposed Mar. 10, 2010) (to be codified at 45 C.F.R. pt. 170) (ONC Certification Proposed Rules).

² See ONC Certification Proposed Rules at 11331.

TIA appreciates the effort the ONC has made to ensure that there are effective certification methodologies and standards in place so that EHRs are meaningfully used. TIA hopes to work with the ONC as it begins establishing certification standards that will enable networks to facilitate electronic exchange of health information.

Sincerely,

/S/

Danielle Coffey
Vice President
Government Affairs