



www.tiaonline.org

10 G Street, NE, Suite 550
Washington, DC 20002

Tel: +1.202.346.3240
Fax: +1.202.346.3241

June 26, 2009

Dr. David Blumenthal, M.D., M.P.P.
National Coordinator
Office of the National Coordinator for Health Information Technology
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dr. Blumenthal:

The Telecommunications Industry Association (TIA) submits its comments on the Office of the National Coordinator's Health IT Policy Committee's proposed Meaningful Use Matrix (Matrix), which establishes conditions that must be satisfied over time for a health care provider to receive funds for the "meaningful use" of electronic health records (EHR). TIA supports the Objectives in the Matrix that require the transmission of EHR data to patients and providers on a technology-neutral basis. Such Objectives will improve health care to the underserved, promote innovative telehealth technologies, and reduce health care costs for each individual. TIA suggests enhancing the focus in the Matrix on the transmission of a patient's relevant health data to providers beyond medical institutions and advancing today's technologically-feasible information- and transmission-based Objectives from the out-years of 2013 and 2015 to 2011.

The data included in an EHR can reduce health disparities to the underserved only if it is shared with many types of health care entities to provide better, more timely, accurate, and comprehensive care. Thus, health care providers should be required to transfer EHR data to hospitals, homes, assisted living facilities, critical care centers, clinics, first responders, and other care providers to support data-driven collaborative medical care teamwork and interaction through fixed and mobile communications devices. For those without access to adequate Internet or wireless services, voice- or telephone-based interfaces should be included as an alternative to reach such segments of the population. Moreover, providers should be required to provide real-time access and updates to EHR on a technology-neutral basis to both patients and providers. Providers should also have messaging capability with other health care providers that incorporate key EHR data.

The Objectives TIA proposes above can be implemented with technologies that are commercially available today and should be included in the 2011 Objectives set.

Similarly, some Objectives proposed in the Matrix for 2013 and 2015 will be achievable in 2011 with technologies currently available and should be advanced to the 2011 Objectives set. These include:

- a. Electronic prescription transmission;
- b. Medication administration using bar coding;
- c. Clinical decision support at the point of care;
- d. Secure patient-provider messaging capability; and
- e. Upload of data from home monitoring devices.

Advancing those information- and transmission-based Objectives that are technologically robust and will be viable in 2011 to the 2011 Objectives set will accelerate new health care technologies to market; any federal support to providers contingent upon use of cutting-edge EHR transmission will provide financial incentive for the development of innovative telehealth technologies in the future. Further, rapid use of EHR transmission technologies will expedite and dramatically reduce the cost of patient care across the provider spectrum.

TIA appreciates the impressive steps you and the Health IT Policy Committee have taken to ensure that EHRs are meaningfully used through innovative telehealth technologies. We appreciate your consideration of our proposals, and look forward to working with you on this important issue.

Sincerely,

_____/S/_____

Danielle Coffey
Vice President
Government Affairs