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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:

On behalf of the Telecommunications Industry Association (TIA) and its over 500 member companies, I congratulate on your appointment as the Department of Health and Human Services' National Coordinator for the Office of the National Coordinator (ONC) for Health Information Technology. As the ONC's Health IT Standards and Policy Committees, under your leadership, work toward developing policies and standards that will securely deliver electronic health data for the benefit of all Americans, I hope that TIA may serve as a resource on technical, policy, and standards issues.

TIA companies lead the consumer and business revolution and are building the world's broadband information networks. TIA member companies range from some of the world's largest multinational corporations to innovative technology startups. Eighty percent of TIA members are small to mid-size companies, and the combined market capitalization of TIA member companies exceeds \$318 billion. Further, TIA member companies include 16% of the Information Technology companies of the S&P 500 and include 2 of the 3 largest companies in the Telecommunications Services portion of the S&P 500. Additionally, TIA members constitute 4 of the 30 Dow Jones Industrial Average companies. TIA and its members work with the health care industry to develop standards and products that will speed broadband technologies and applications to hospitals, first responders, and scores of commercial industries. In fact, TIA's TR-49 Engineering Committee for Healthcare IT has 10 companies participating in writing standards for next-generation networks. For over 80 years, we have represented the information and communications technology (ICT) industry through standards development, advocacy, tradeshow, business opportunities, market intelligence and world-wide environmental regulatory analysis. TIA enhances the effectiveness of health information delivery with broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications.

Given our members' expertise, we offer our input to you and the Health IT Policy and Standards Committees. I am confident that, as policies and standards are developed by the ONC, we can offer insight into how delivery of health records can be maximized with

ICT products, how your work impacts the efficiency of health information delivery to key entities, and how health IT standards may be utilized for the greatest benefit to patients. It is our hope that we can continue our dialog with you as you participate in the Health IT Policy Committee.

I have provided a brief summary of TIA's key policy points on issues to be addressed by the ONC and its Standards and Policy Committees. Additionally, the enclosed graphic illustrates how TIA's member products can effectively deliver health information to first responders, emergency rooms, and other vital health care entities.

Again, I offer our assistance in any technical, policy, or standards matter on which you may seek input from the ICT industry, and thank you for your thoughtful consideration of our views.

Sincerely,

A handwritten signature in black ink, appearing to read 'Danielle Coffey', written in a cursive style.

Danielle Coffey
Vice President
Government Affairs



TIA's Key Points on Policies to Be Addressed By The Office of the National Coordinator for Health Information Technology

1) "MEANINGFUL USE" OF EHR'S INCLUDES TRANSPORTABILITY VIA WIRELINE AND WIRELESS NETWORKS TO MEDICAL PROVIDERS. In order for a provider to "meaningfully use" an electronic health record (EHR), and therefore be eligible for federal funding for such use, the EHR must be:

- a) Provided via wireline and/or wireless technologies among medical providers, including first responders, hospitals, clinics, and doctors;
- b) Delivered through technology-neutral standards that allow providers to implement flexible, standards-based EHR systems based on their own choice of hardware, software and network technologies;
- c) Accessed by patients anywhere on their own choice of consumer electronics (e.g., PCs, smartphones); and
- d) Integrated into the technologies and systems for diagnosis and delivering patient care.

2) ONC FUNDING FOR EHR ADOPTION SHOULD BEGIN AS QUICKLY AS POSSIBLE; CERTIFICATION CRITERIA SHOULD ALLOW FOR THE CURRENT AND CONTINUING DEPLOYMENT OF HEALTH INFORMATION TECHNOLOGY. It is vital that funding for providers adopting EHRs is granted quickly so that EHR use can begin as soon as possible. Medical providers and patients are already realizing significant benefits from EHR deployments today, and those benefits will increase as EHR certification criteria become further standardized. EHR certification criteria should be "forward-compatible," allowing medical providers and patients to adopt and use commonly available IT equipment capable of conforming to EHR standards as they evolve into the future. Such criteria should ensure that an EHR's scale and scope allow for data delivery to homes and senior living and nursing homes and provide a process for evidence-based decision making for providers.

3) ONC SHOULD TAKE A SYSTEMS-BASED APPROACH TO ENSURE DATA INTEROPERABILITY AND END-TO-END TRANSPORT OF ACCURATE, PROTECTED HEALTH DATA. Health information exchange should support the delivery of accurate health data where it is needed, when it is needed, and in the format it is needed. To accomplish this goal, proposed standards and policies should ensure information exchange inclusive of application software, communications systems, networking technologies, and end-user devices to ensure data interoperability among EHR systems as well as end-to-end transport of protected health data among the IT and telecommunications equipment that support the creation, transport, storage, and presentation of health information.

4) ONC AND HHS SHOULD MAXIMIZE EXISTING STANDARDS AND TECHNOLOGIES. ONC and the Department of Health and Human Services (HHS) should, with the short time frame in which to propose and adopt initial standards, maximize existing standards and technologies and avoid mandating new standards that will make the creation of new and innovative technologies more difficult and costly. Current industry best practices should be adopted by the ONC's Policy and Standards Committees. For example, TIA supports HHS' recent proposal to adopt existing, well-known and widely used information security technologies that establish compliance with HIPAA (e.g., FIPS 140-2) as standard criteria for protecting patient privacy pursuant to the ARRA.

Enabling Healthcare IT Innovation to Underserved Areas

