

March 27, 2019

Don Rucker, M.D.
National Coordinator
Office of the National Coordinator for Health IT
330 C St SW
Washington, DC 20201

Seema Verma
Administrator
Centers for Medicare & Medicaid Services
7500 Security Blvd.
Baltimore, MD 21244-8013

Re: **Request for Comment Period Extension** for ONC: 21st Century Cures Act: Interoperability, Information Blocking, and the ONC Health IT Certification Program (**RIN 0955-AA01**) and CMS: Interoperability and Patient Access (**CMS-9115-P**)

Sent via email to: Donald.Rucker@hhs.gov and Seema.Verma@cms.hhs.gov

Dear National Coordinator Rucker and Administrator Verma:

The undersigned organizations representing numerous and diverse organizations and perspectives within the health care eco-system write to express our appreciation for the recent release of the above referenced proposed rules. We are all strongly committed to more rapidly advancing nationwide interoperability. The proposed rules are comprehensive, detailed and inter-twined. They contain provisions with far-reaching implications for virtually all stakeholders in our healthcare system. We look forward to providing comments on the wide range of complex, technical, legal and administrative issues included in the rules.

Given the importance of this effort, we respectfully request that you provide, at a minimum, a 30-day extension of the deadline to submit comments on the proposed rules, as well as corresponding adjustments to the implementation timelines proposed in the rules. An extension of the comment period will provide more adequate time to allow thoughtful analysis of the proposed rules and their impacts and to fully address the proposed rules' multiple requests for comments and information embedded within the documents.

Thank you for considering our request.

Sincerely,

American College of Surgeons (ACS)
America's Essential Hospitals (AEH)
American Health Information Management
Association (AHIMA)
American Medical Association (AMA)
American Medical Group Association® (AMGA™)
Association of American Medical Colleges (AAMC)
Catholic Health Association of the United States
Children's Hospital Association
College of Healthcare Information Management
Executives (CHIME)
Connected Health Initiative (CHI)

Federation of American Hospitals (FAH)
Greater New York Hospital Association (GNYHA)
Healthcare Leadership Council (HLC)
Massachusetts eHealth Collaborative
MGMA (Medical Group Management Association)
National Association for the Support of Long Term
Care (NASL)
National Association of Chain Drug Stores (NACDS)
National Rural Health Association (NRHA)
Netsmart
Premier healthcare alliance
Sansora Health