March 27, 2019

Don Rucker, M.D.  Seema Verma
National Coordinator  Administrator
Office of the National Coordinator for Health IT  Centers for Medicare & Medicaid Services
330 C St SW  7500 Security Blvd.
Washington, DC 20201  Baltimore, MD 21244-8013


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)  Federation of American Hospitals (FAH)
America’s Essential Hospitals (AEH)  Greater New York Hospital Association (GNYHA)
American Health Information Management Association (AHIMA)  Healthcare Leadership Council (HLC)
American Medical Association (AMA)  Massachusetts eHealth Collaborative
American Medical Group Association® (AMGA™)  MGMA (Medical Group Management Association)
Association of American Medical Colleges (AAMC)  National Association for the Support of Long Term Care (NASL)
Catholic Health Association of the United States  National Association of Chain Drug Stores (NACDS)
Children's Hospital Association  National Rural Health Association (NRHA)
College of Healthcare Information Management Executives (CHIME)  Netsmart
Connected Health Initiative (CHI)  Premier healthcare alliance
Sansora Health