

February 9, 2023

Chiquita Brooks-LaSure
Administrator, Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard Baltimore, MD 21244

Dear Administrator Brooks-LaSure,

On behalf of the 30 member companies of the Electronic Health Record (EHR) Association, we are contacting CMS regarding the *Advancing Interoperability and Improving Prior Authorization Processes* NPRM (file code CMS-0057-P). We respectfully request that CMS extend the comment period on the proposed rule so it remains open until at least 45 days after the ONC NPRM on *Patient Engagement, Information Sharing, and Public Health Interoperability* has been published.

The industry has been waiting for the aforementioned proposed ONC regulation since last year. We understand it will include requirements for health IT vendors related to supporting some of our clients' obligations under the CMS Interoperability and Prior Authorization proposals; without a clear understanding of those impending EHR developers' obligations, it is not possible for the EHR Association, our member companies, or our clients to offer appropriate, robust feedback to the CMS proposed rule.

We strongly urge CMS to delay the deadline for comments on your proposed rulemaking to allow all stakeholders to consider the crucial context of ONC's requirements for the technology our clients will use to comply with the CMS rule. The Association's leadership can be reached by contacting Kasey Nicholoff at knicholoff@ehra.org should you have any questions.

Thank you for your consideration.
Sincerely,



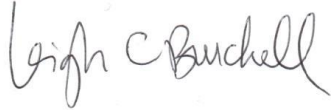
David J. Bucciferro
Chair, EHR Association
Foothold Technology



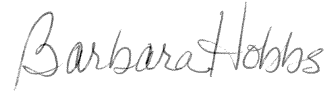
William J. Hayes, M.D., M.B.A.
Vice Chair, EHR Association
CPSI

AdvancedMD	CureMD	Flatiron Health	MEDITECH, Inc.	Office Practicum
Allscripts	eClinicalWorks	Foothold Technology	Medsphere	Oracle Cerner
Altera Digital Health	eMDs – CompuGroup Medical	Greenway Health	Modernizing Medicine	Sevocity
Athenahealth	Endosoft	Harris Healthcare Group	Netsmart	STI Computer Services
BestNotes	Epic	MatrixCare	Nextech	TenEleven Group
CPSI	Experity	MEDHOST	NextGen Healthcare	Varian – A Siemens Healthineers Company

HIMSS EHR Association Executive Committee



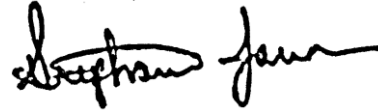
Leigh Burchell
Altera Digital Health



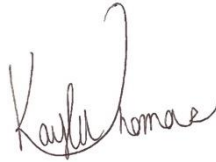
Barbara Hobbs
MEDITECH, Inc.



Cherie Holmes-Henry
NextGen Healthcare



Stephanie Jamison
Greenway Health



Kayla Thomas
Oracle Cerner

Established in 2004, the Electronic Health Record (EHR) Association is comprised of 30 companies that supply the vast majority of EHRs to physicians' practices and hospitals across the United States. The EHR Association operates on the premise that the rapid, widespread adoption of EHRs will help improve the quality of patient care as well as the productivity and sustainability of the healthcare system as a key enabler of healthcare transformation. The EHR Association and its members are committed to supporting safe healthcare delivery, fostering continued innovation, and operating with high integrity in the market for our users and their patients and families. The EHR Association is a partner of HIMSS. For more information, visit www.ehra.org.