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March 4, 2019

Donald Rucker, MD  
National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C Street SW  
Washington, DC 20201

Dear Dr. Rucker,

Thank you for meeting with members of the Electronic Health Record Association during HIMSS19 Global Conference. We appreciate your candor and your consideration of our initial thoughts on the proposed rule, *21<sup>st</sup> Century Cures Act: Interoperability, Information Blocking, and the ONC Health IT Certification Program*.

The proposed rule from ONC is a substantive one. It suggests complicated, significant adjustments to the regulations already governing the health information and technology industry, and stakeholders deserve adequate time to provide thoughtful, detailed comments on the impacts of the proposals. **Therefore, the EHR Association writes today to request a 30-day extension of the comment period to June 3, 2019.**

If additional time is allowed, it would enable EHR developers to survey EHR Association members in order to provide ONC with actual development timelines for the measures being proposed. While some measures may be straightforward to achieve in a short timeline, others are likely to require more complex coding and implementation, thus calling into question the feasibility of the proposed 24-month development, testing and implementation timeline.

We know you share our aversion to unintended consequences and added provider burden that sometimes accompanies new standards and measures; an extended comment period will allow all stakeholders to carefully evaluate the potential effects of ONC's proposals. We recognize the desire to roll out these rules quickly, but with an ultimate goal of enhanced usability, it is important that adequate time be allowed for commenters.

Between ONC's and CMS' two proposed rules, developers and other stakeholders have a lot of work ahead of us for this comment period. We expect ONC to hold

developers to high standards and implementation timelines, and we also hope that the agency will work with the development community to finalize requirements that are achievable. To do it right, we must first be allowed adequate time to provide the agency with data and insights necessary to draft an implementable final rule that will effectively support patients and their healthcare providers.

Sincerely,



Cherie Holmes-Henry  
Chair, EHR Association  
NextGen Healthcare



Sasha TerMaat  
Vice Chair, EHR Association  
Epic

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**About the EHR Association**

Established in 2004, the Electronic Health Record (EHR) Association is comprised of more than 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](http://www.ehra.org).