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January 26, 2017

Hemi Tewarson, JD  
Program Director, Health Division  
National Governors Association  
Hall of the States  
444 North Capitol Street, Suite 267  
Washington, D.C. 20001-1512

Dear Ms. Tewarson,

On behalf of the EHR Association (EHRA), and our more than 30 member companies, we would like to commend the National Governors' Association (NGA) on the publication of "Getting the Right Information to the Right Health Care Providers at the Right Time: A Road Map for States to Improve Health Information Flow Between Providers." Established in 2004, EHRA brings together companies that develop, market, and support electronic health records (EHRs); to collaborate on issues of importance to our companies and, notably, to our collective customers – hospitals, health care organizations and clinicians – who represent the majority of EHR users in the US. We work together to speak with a unified voice on these topics in a non-competitive, collegial effort to understand, educate, and collaborate with all stakeholders engaged with EHRs and health information technology. As health IT developers, we are encouraged to see that several of the barriers to successful clinical data sharing are identified and that proposed paths to addressing them are outlined.

In addition to addressing market and legal barriers, we suggest that as NGA refines the roadmap, they recognize the need for implementing industry standards. Potential sources should include: the Office of the National Coordinator for Health IT's (ONC's) most current Certification Edition complemented by the mature and well-adopted elements of the [Interoperability Standards Advisory \(ISA\)](#). Such standards are a proven means to creating an environment that is conducive to effective data sharing.

EHR developers are working with hundreds of thousands of healthcare providers organizations to help them achieve meaningful interoperability; together with our members, we are well positioned to provide valuable insight to the states.

Considering the respective roles of providers and health IT developers in achieving successful interoperability, we suggest that the NGA clarify in its roadmap that provider representation should be included in the proposed core team from the start, while health IT developer representation should be included in the Advisory Group. The EHRA Standards and Interoperability Workgroup is available to participate in the advisory groups you are recommending.

In addition, a key point that the EHRA has repeatedly made is that interoperability simply for the sake of interoperability (e.g., implementing a solution to “check a box” for regulatory conformance but unrelated to patient care) is not a sufficient driver for provider organizations to pursue data sharing with other providers. Rather, interoperability solutions that improve patient outcomes and the efficiency of care delivery or increase patients’ access to their information are worth the collaborative effort required to address any challenges that may exist. There have been many interoperability success stories built around the experiences of states that have aligned their interoperability standards strategy with outcome improvements supported by the recommendations of [ONC’s Interoperability Standards Roadmap](#) and their Certification Editions. The EHRA would gladly share some of these success stories with the National Governors Association. We therefore urge that states focus on identifying important outcomes around care coordination and patient engagement that in turn will provide the impetus to engage in focused interoperability initiatives.

We would also emphasize that consistency in standards and associated interoperability requirements and policies across states, registries, and third party vendors engaged with health IT developers is essential to high levels of interoperability. One of the driving factors behind the [EHR Developer Code of Conduct](#), introduced by the EHRA in 2013 and updated in 2016, was to encourage such consistency. The Code and its principles demonstrate a willingness by its adopters to work closely across stakeholder organizations enabling our customers to achieve widespread data sharing in the near term.

If there is interest in further discussing how the EHRA can contribute to advancing interoperability within and across states, please contact Sarah Willis-Garcia, EHRA Program Manager, at [swillis@himss.org](mailto:swillis@himss.org). Thank you again for your good work on this important initiative.

Sincerely,



Sasha TerMaat  
Chair, EHR Association  
Epic

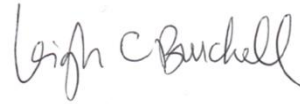


Richard Loomis, MD  
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### About the EHR Association

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