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Office of the National Coordinator for Health Information Technology
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

The Telecommunications Industry Association (TIA) submits its comments on the Office of the National Coordinator's (ONC) interim final rule for Stage 1 standards that must be satisfied beginning in 2011 for a health care provider to receive funds for the "meaningful use" of electronic health records (EHR). TIA appreciates the efforts of the ONC to ensure effective and timely transmission of EHRs as part of the Stage 1 standards. TIA suggests that the ONC emphasize that several transmission-based initiatives are encouraged in Stage 1 standards and will be mandatory after 2011.

In order to ensure the broadest secure access of EHRs by those providing health care, the final rule for Stage 1 standards should make clear that health care providers are encouraged to operate to the greatest extent possible paperless, and transfer EHR data to all forms of health care entities, including hospitals, homes, assisted living facilities, critical care centers, clinics, first responders, social workers, and other care providers to support data-driven collaborative medical care teamwork and interaction through fixed and mobile communications devices. While health care providers are not precluded from transmitting EHRs to any of these health care facilities, TIA recommends that these entities be specifically identified as those that should receive EHRs from health care providers. Similarly, in order to receive and transmit vital patient health information in a timely manner supporting robust remote health care, the ONC should encourage the uploading of data from home and mobile monitoring devices. Moreover, these provisions should be mandatory demonstrated capabilities for health care providers after 2011.

TIA appreciates the impressive steps the ONC has taken to ensure that EHRs are meaningfully used through innovative telehealth technologies. We appreciate your consideration of our proposals, and look forward to working with you on this important issue.

Sincerely,

/S/

Danielle Coffey
Vice President
Government Affairs