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Department of Health and Human Services
Attention: CMS-0033-P
P.O. Box 8013
Baltimore, MD 21244-8013

The Telecommunications Industry Association (TIA) submits its comments on the Centers for Medicare & Medicaid Services' (CMS) proposed rule to establish the initial rules and criteria 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 CMS to ensure effective and timely transmission of EHRs as part of the Stage 1 standards. TIA suggests that CMS 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, CMS should emphasize the value of uploading 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 CMS 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