



May 17, 2023

Dr. Micky Tripathi
National Coordinator
Office of the National Coordinator for Health Information Technology (ONC)
U.S. Department of Health and Human Services
330 C St SW, Floor 7
Washington, DC 20024

Dear Dr. Tripathi:

CHIME is an executive organization dedicated to serving chief information officers (CIOs), chief medical information officers (CMIOs), chief nursing information officers (CNIOs) and other senior healthcare IT leaders. With over 5,000 members, CHIME provides a highly interactive, trusted environment enabling senior professional and industry leaders to collaborate; exchange best practices; address professional development needs; and advocate for the effective use of information management to improve the health and healthcare in the communities they serve.

Published in the *Federal Register* on April 18, 2023 – The Office of the National Coordinator for Health Information Technology’s (ONC) “Health Data, Technology, and Interoperability: Certification Program Updates, Algorithm Transparency, and Information Sharing” (HTI-1) proposed rule implements provisions of the 21st Century Cures Act and make updates to the ONC Health IT Certification Program (Certification Program) with new and updated standards, implementation specifications, and certification criteria. The proposed rule also includes multiple requests for information (RFI) to inform potential future rulemaking. RFI topic areas include electronic prior authorization, lab interoperability, predictive decision support interventions, and advanced Fast Healthcare Interoperability Resource (FHIR®) capabilities, among others across 45 CFR Parts 170 and 171.

As ONC states, “implementation of the proposed rule’s provisions will advance interoperability, improve transparency, and support the access, exchange, and use of electronic health information.”¹ We appreciate ONC’s ongoing efforts to advance health data exchange and interoperability while promoting health equity for all.

The HTI-1 proposed rule is available for public comment until June 20, 2023 at 11:59 pm ET. Given the magnitude of the proposed policies and their impact on our members and the patients they serve, we respectfully request that ONC extend the notice-and-comment period for an additional 30 days, at minimum. This would allow the HTI-1 proposed rule to be available for public comment until July 20, 2023 at 11:59 pm ET.

CHIME members remain steadfast in their commitment to being partners with their patients to facilitate greater interoperability. **The need for additional time to provide feedback is crucial to ensure that**

¹ *Health Data, Technology, and Interoperability: Certification Program Updates, Algorithm Transparency, and Information Sharing (HTI-1) Proposed Rule* | HealthIT.gov. (n.d.). Retrieved May 16, 2023, from <https://www.healthit.gov/topic/laws-regulation-and-policy/health-data-technology-and-interoperability-certification-program>

we can offer ONC the input that this proposed rule requires. Furthermore, we must ensure that our members understand the significance of this proposed rule, are prepared to meet its requirements, and have the technology and funding to support implementation. CHIME has been supportive of ONC's efforts towards increased interoperability. Considering the substantial importance and impact of these proposed policies, we aim for their smooth and successful implementation after the final rule is issued, benefiting both patients and the providers who care for them.

Given the aforementioned challenges and expected policy changes outlined above, we respectfully urge ONC to provide an additional 30-day minimum extension for public commenters on the HTI-1 proposed rule. In turn, stakeholders – including CHIME – will be better able to provide ONC with meaningful, qualitative and quantitative comments on these proposals. Should you have any questions or if we can be of assistance, please contact Chelsea Arnone, Director, Federal Affairs at carnone@chimecentral.org.

Sincerely,

A handwritten signature in black ink, reading "Russell P. Branzell". The signature is written in a cursive style with a large, stylized initial "R".

Russell P. Branzell, CHCIO, LCHIME
President and CEO
CHIME

cc: The Honorable Xavier Becerra, Secretary, U.S. Department of Health and Human Services