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June 11, 2009

Dr. David Blumenthal M.D., MPP
National Coordinator for Health Information Technology
Department of Health and Human Services
200 Independence Ave. SW
Washington, DC 20201

Dear Dr. Blumenthal:

On behalf of the Board of Directors and members of the Healthcare Information and Management Systems Society (HIMSS), I am pleased to submit written comments on the Office of the National Coordinator's Health Information Technology Regional Extension Program Draft Plan, as published in the *Federal Register* on May 28, 2009. HIMSS is the healthcare industry's membership organization exclusively focused on providing leadership for the optimal use of healthcare information technology and management systems for the betterment of healthcare. HIMSS represents more than 22,000 individual, 350 corporate members, and 46 chapters nationwide. HIMSS seeks to shape healthcare public policy and industry practices through its educational, professional development, and advocacy initiatives designed to promote information and management systems' contribution to quality patient care.

The historic significance of the HITECH provisions in the American Recovery and Reinvestment Act (ARRA) supports the nationwide initiative to expand adoption and meaningful use of healthcare IT solutions. The Draft Plan you have promulgated for the Regional Extension Center Initiative takes a great leap forward toward ensuring the healthcare community can achieve expansion and meaningful use of these healthcare IT solutions. HIMSS appreciates your decision to include healthcare community observations and recommendations as part of your effort to meet the statutory requirements for the program. Given the short time frame for comment review and program initiation, we offer the following observations:

Prioritize Provider Categories:

The relationship between primary care and specialty care providers is critical to effective healthcare delivery in the U.S. Timely and cost effective implementation and meaningful use of healthcare IT solutions by these categories of providers will greatly influence the forecasted savings and cost avoidance envisioned for healthcare reform, particularly clinical effectiveness research and quality improvement activities. HIMSS encourages the Office of the National Coordinator to consider expanding the provider participant categories to include specialty practices to ensure their engagement in these reform initiatives. Given the critical role these two provider categories will have in healthcare reform activities, we encourage the Office of the National Coordinator to prioritize the inclusion of primary and specialty care providers in the Extension Center initiatives.

In addition, HIMSS encourages the Office of the National Coordinator to consider other care settings, including long-term, community-based, home care, and public health-based locations.

Leverage the experience and expertise of associations: HIMSS and many of our association colleagues have experience in delivering provider education on healthcare IT. These professionals have the knowledge and experience necessary to support and accelerate the efforts to adopt, implement and effectively utilize and manage health information technology. The lessons learned from our [Davies Award](#) recipients (Organizational, Ambulatory, Public Health, and Community Health Organizations), as well as past initiatives including the Physicians Adopting Computer Technology and Katrina Phoenix programs can offer practical insight into potential solutions to the barriers confronting providers during the adoption process. HIMSS encourages the Office of the National Coordinator to consider including healthcare associations in the organization preference criteria, so the information can be more formally shared with Regional Extension Centers and providers.

We appreciate the opportunity to comment on the Health Information Technology Regional Extension Center Draft Program Plan. We understand the Alliance for Nursing Informatics, the HIMSS Electronic Health Record Association, and the HIT Collaborative for the Underserved have submitted observations on the Draft Program Plan. Each offers a unique perspective that should prove valuable to Program's development and initiation.

HIMSS looks forward to engaging our members and resources in your efforts to achieve meaningful use of healthcare IT solutions and related improvements in healthcare quality and delivery that are anticipated in the ARRA. Our staff point of contact is [Mr. Thomas M. Leary](#), Senior Director for Federal Affairs.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Lieber". The signature is fluid and cursive, with a large initial "S" and "L".

H. Stephen Lieber, CAE
HIMSS President/CEO