



**CALIFORNIA  
HOSPITAL  
ASSOCIATION**

*Providing Leadership in  
Health Policy and Advocacy*

March 29, 2019

Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Hubert H. Humphrey Building  
200 Independence Avenue, S.W., Room 445-G  
Washington, D.C. 20201

Donald Rucker, MD  
National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
Mary E. Switzer Building  
330 C Street SW, 7<sup>th</sup> Floor  
Washington, D.C. 20201

***Subject: Request for Delay of Comment Period***

Dear Administrator Verma and Dr. Rucker:

On behalf of our more than 400 member hospitals and health systems, the California Hospital Association (CHA) writes to request that the comment period for the Centers for Medicare & Medicaid Services (CMS) *Interoperability and Patient Access for Medicare Advantage Organization and Medicaid Managed Care Plans, State Medicaid Agencies, CHIP Agencies and CHIP Managed Care Entities, Issuers of Qualified Health Plans in the Federally Facilitated Exchanges and Health Care Providers*, and the Office of the National Coordinator for Health Information Technology (ONC) *21st Century Cures Act: Interoperability, Information Blocking, and the ONC Health IT Certification Program* proposed rules be extended for a minimum of 30 days.

CHA shares the ONC and CMS goals of improved interoperability and patient access to health information. In that pursuit, all will want to be cautious to not create unintended consequences. The proposed rules are complex, interwoven, and if implemented, would require significant changes in a very short amount of time. They also include important requests for information that will require further review and consideration. To provide the best possible advice to the agencies, California's hospitals need time to thoughtfully analyze the proposals, consider alternative solutions, and think critically about how to achieve our shared goals. The current timeline for processing the intricacies of these proposals is insufficient.

Therefore, **CHA urges CMS and ONC to consider an extended comment deadline of June 3, 2019.**

Allowing stakeholders the time needed to carefully evaluate the proposals' possible effects and offer the most effective feedback will help to ensure the proposed rules meet their intended goals of improved interoperability of and patient access to health information, while minimizing the potential for unintended consequences and added provider burden.

CHA appreciates your consideration of our request and looks forward to continued engagement with CMS and ONC. If you have any questions, please do not hesitate to contact me at (202) 488-4688 or

Administrator Verma and Dr. Rucker  
March 29, 2019

---

[akeefe@calhospital.org](mailto:akeefe@calhospital.org), or my colleague Megan Howard, senior policy analyst, at (202) 488-3742 or [mhoward@calhospital.org](mailto:mhoward@calhospital.org).

Sincerely,

/s/

Alyssa Keefe

Vice President, Federal Regulatory Affairs