



**MITA**<sup>®</sup>  
**MEDICAL IMAGING  
& TECHNOLOGY ALLIANCE**  
A DIVISION OF **NEMA**<sup>®</sup>

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May 25, 2016

The Honorable Karen B. DeSalvo  
Acting Assistant Secretary for Health  
U.S. Department of Health and Human Services  
Humphrey Building  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Madam Secretary:

We at the Medical Imaging & Technology Alliance (MITA), a division of the National Electrical Manufacturers Association (NEMA), share the principle that to achieve open, connected care for our communities, we all have the responsibility to take action. To further these goals, we commit to the following principles to advance interoperability among health information systems enabling free movement of data, which are foundational to the success of delivery system reform.

1. **Consumer Access:** To help consumers easily and securely access their electronic health information, direct it to any desired location, learn how their information can be shared and used, and be assured that this information will be effectively and safely used to benefit their health and that of their community.
2. **No Blocking/Transparency:** To help providers share individuals' health information for care with other providers and their patients whenever permitted by law, and not block electronic health information (defined as knowingly and unreasonably interfering with information sharing).
3. **Standards:** Implement federally recognized, national interoperability standards, policies, guidance, and practices for electronic health information, and adopt best practices including those related to privacy and security.

**MITA commits to interoperability and our past accomplishments demonstrate that commitment.**

MITA has a history of developing standards in support of ONC's interoperability principles, as a standards developing organization, accredited by the American National Standards Institute (ANSI) and recognized by the International Standards Organization (ISO).

MITA's ongoing commitment to these three (3) principles is demonstrated by these and other initiatives:

- **Digital Imaging and Communications in Medicine (DICOM).** MITA is the Secretariat for DICOM, *the* standard enabling interoperability in medical imaging. DICOM is the globally adopted standard for handling, storing, displaying, printing, and transmitting medical images and related information, and is recognized in the ONC Nationwide Interoperability Roadmap and Interoperability Standards

Advisory. DICOM defines the local network protocols that enable image storage and reporting today, the CD, DVD and USB formats that allow patients to walk away with copies of their studies, and the RESTful DICOMweb APIs that enable the next generation of web-based imaging applications and easy image access for EMR systems. To promote adoption and access, there is no charge to download or license the DICOM Standard. Hundreds of billions of DICOM images (over 5 billion in the VA hospital system alone) comprise a large part of the interoperable health records of patients around the world.

- **Manufacturer Disclosure Statement for Medical Device Security (MDS2)**. As the co-developer of the MDS2 along with the Healthcare Information and Management Systems Society (HIMSS), this standard espouses the “no blocking/transparency” principle with manufacturers providing
  - a model-specific description of a medical imaging devices’ ability to maintain/transmit electronic protected health information and the security features associated with the device
  - the healthcare provider’s review and analysis of the large volume of security-related information supplied by manufacturers
- **Enterprise Imaging and Access**. MITA supports Enterprise Imaging, a model in which imaging information can be accessed via the EMR. Allowing a healthcare provider to access the patient’s imaging information thru the Electronic Health Record can be a valuable tool for healthcare providers to improve care and manage costs.

As the leading trade organization for medical imaging manufacturers, MITA and its members are committed to advancing interoperability for the benefit of patients and healthcare practitioners

Sincerely,



Nelson Mendes  
Chair, MITA Board of Directors

*MITA is the collective voice of medical imaging equipment and radiopharmaceutical manufacturers, innovators and product developers. It represents companies whose sales comprise more than 90 percent of the global market for medical imaging technology. These technologies include: magnetic resonance imaging (MRI), medical X-Ray equipment, computed tomography (CT) scanners, ultrasound, nuclear imaging, radiopharmaceuticals, and imaging information systems. Advancements in medical imaging are transforming health care through earlier disease detection, less invasive procedures and more effective treatments. The industry is extremely important to American healthcare and noted for its continual drive for innovation, fast-as-possible product introduction cycles, complex technologies, and multifaceted supply chains. Individually and collectively, these attributes result in unique concerns as the industry strives toward the goal of providing patients with the safest, most advanced medical imaging currently available.*