April 3, 2015

Karen DeSalvo, MD, MPH, MSc
National Coordinator for Health Information Technology
Acting Assistant Secretary
Department of Health and Human Services
200 Independence Ave., S.W. Suite 729-D
Washington, D.C. 20201

RE:     Connecting Health and Care for the Nation: A 10-Year Vision to Achieve
        an Interoperable Health IT Infrastructure

Dear Dr. DeSalvo:

The Healthcare Administrative Technology Association (HATA) strongly advocates for EDI standardization and compliance within the healthcare industry.  HATA supports ONC's efforts to gather all stakeholders within the health industry around a specifically defined healthcare industry interoperability road map.

**Background on the Healthcare Administrative Technology Association (HATA)**
The Healthcare Administrative Technology Association (HATA)  is a non-profit trade association to provide a forum for healthcare administrative technology, and other affiliated stakeholders. The association serves as one representative voice to advocate and influence key stakeholders and government representatives on healthcare administrative technology issues.

Our members, ADP AdvancedMD, HealthPac, MDSynergy, Medinformatix, NextGen, Optum, and PracticeAdmin represent over 275,000 providers.

HATA's mission is to be an invaluable resource for its members to receive education and healthcare industry information quickly and easily, provide the tools to expand and build upon a member's client base, network and collaborate with practice management system (PMS) peers and other industry stakeholders, advocate with one representative voice, and influence the healthcare community on issues vital to the healthcare administrative technology industry.

Formal representation of such an important piece of the healthcare ecosystem is critical to the advancement of the industry.  HATA is a key stakeholder in the $40 billion physician revenue cycle industry and is an active and influential voice promoting the goals and values within the healthcare administrative industry and driving administrative efficiencies.

The practice management system industry has more than 600 members providing a variety of technology solutions for the full range of healthcare professionals. The industry represents nearly 100 percent of all initial claims submitted on behalf of hospitals, physicians and allied healthcare professionals.  Administrative simplification of claim processing is a key factor in influencing the cost of healthcare in the United States, and HATA will lead the movement in this area.

In that light, following are the Cooperative Exchange responses to the ONC's specific questions:

**General**

**3.        Is the timing of specific actions appropriate?**

Practice Management Systems (PMS) vendors need time for product development and testing before those products can be rolled out to other users who must then spend time in implementation and training.  ONC needs to realize these practical considerations and include them in timelines as well as take into consideration other existing and or emerging regulations in which there are competing resource issues.

**HATA would suggest that many of the timelines for implementation are too optimistic and need to be revised.**

**3.4.      Are the right actors/stakeholders associated with critical actions**?

The list of stakeholders on Page 5 include, "People and organizations that provide health IT capabilities Technology developers for EHR and other health IT, including but not limited to health information exchange (HIE) technology, laboratory information systems, personal health records, pharmacy systems, mobile technology, medical device manufacturers and other technology that provides health IT capabilities and services."

**HATA strongly encourages ONC to make sure Practice Management Systems (PMS) are on this list of organizations as PMS Vendors play a key enabler role in the infrastructure framework.**

**Certification and Testing**

HATA members have participated in the EHNAC Practice Management System Accreditation Program (PMSAP) to assure our customers that we meet or exceed industry requirements for standards, privacy, and security.  It will be important for ONC to recognize and work closely with other certification/ accreditation programs to reduce any duplication of effort on the part of stakeholders and to align, as closely as possible, requirements among programs.

Thank you for this opportunity to comment.

Sincerely,

Tim McMullen, JD – Executive Director
Healthcare Administrative Technology Association (HATA)
1540 S. Coast Hwy., Ste 204
Laguna Beach, CA 92651
(844) 440-HATA (4282) - office
(214) 676-7751 - cell
tim@hata-assn.org
www.hata-assn.org