



MITA[®]
MEDICAL IMAGING
& TECHNOLOGY ALLIANCE
A DIVISION OF **NEMA**[®]

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March 18, 2020

Donald W. Rucker, M.D.
National Coordinator for Health Information Technology
Office of Health and Human Services
200 Independence Avenue S.W.
Washington, D.C., 20201

Submitted via www.healthit.gov

Re: Draft 2020-2025 Federal Health IT Strategic Plan

Dear Dr. Rucker,

As the leading trade association representing the manufacturers of medical imaging equipment and radiopharmaceuticals, the Medical Imaging & Technology Alliance (MITA), believes in the importance of promoting health IT in the areas of a data-driven ecosystem, security and interoperability. MITA Members have decades of experience developing and deploying health IT solutions within the healthcare sector, and share the goals of Office of the National Coordinator (ONC) to improve Health IT as recently underscored by release of the final rule of the 21st Century Cures Act: Interoperability, Information Blocking, and the ONC Health IT Certification Program. MITA would like to congratulate ONC and express support for finalizing rules such as extending U.S. Core Data for Interoperability (USCDI) to promote information sharing between EMR systems and non-EMR systems. To ensure we continue to build on the recent positive work, we submit the following comments on the Strategic Plan:

- 1) We recommend that the ONC go further to highlight the importance of consolidating and harmonizing interfaces to clinical registries. Current practices create administrative and financial burden (as acknowledged on page 989 of the final rule) for providers, who must connect ancillary technologies to disparate regional registries via a multitude of connectivity interfaces.
- 2) There is opportunity for ONC to promote global consensus Standards in its strategic plan. Regional variance between common markets and innumerable integration guides increase the burden to design, integrate and support health IT informatics systems. We strongly urge ONC to lead the international community in a push for harmonization of consensus Standards at a global level through initiatives such as the Global Digital Health Partnership. We would eagerly volunteer to participate in such an effort.

We commend the ONC for its consistent effort and commitment to this important issue. If you have any further questions, please do not hesitate to contact Zack Hornberger, Director of Cybersecurity & Informatics, at zhornberger@medicalimaging.org or (703) 841-3285.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Hope". The signature is fluid and cursive, with a large initial "P" and a long horizontal stroke at the end.

Patrick Hope
Executive Director, MITA

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, radiation therapy equipment, 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.