

March 6, 2019

Donald Rucker, MD  
National Coordinator for Health Information  
Technology  
Office of the National Coordinator for Health  
Information Technology  
U.S. Department of Health and Human Services  
330 C Street, SW  
Washington, DC 20201

The Honorable Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
U.S. Department of Health and Human Services  
Hubert H. Humphrey Building, Room 445-G  
200 Independence Avenue, SW  
Washington, DC 20201

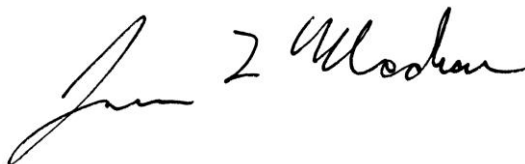
Dear Dr. Rucker and Administrator Verma:

On behalf of the physician and medical student members of the American Medical Association (AMA), I want to express my appreciation for the detail and thought put into your proposed rules, *21<sup>st</sup> Century Cures Act: Interoperability, Information Blocking, and the ONC Health IT Certification Program and Medicare and Medicaid Programs; Patient Protection and Affordable Care Act and the 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.*

The 21<sup>st</sup> Century Cures Act includes many provisions that, through prudent regulation, will advance patients' and physicians' access to medical information. I recognize and appreciate the desire for swift rulemaking. However, such rapid change in health care policy, technology, and business practices may lead to unintended consequences for patient privacy and physician burden. Moreover, the proposed rules are interwoven, complex in nature, and include multiple detailed requests for information. To ensure that the rules are as successful as possible in meeting your goals, it is vital that stakeholders be given adequate time to provide comprehensive, thoughtful, and detailed comments. Expediency should not take precedence over deliberation as we confront a true paradigm shift in health care. I therefore urge that the comment periods for both rules be extended by at least 30 days. I appreciate your consideration and ongoing collaboration.

Thank you for considering our request. If you have any questions or care to discuss further, please feel free to reach out to Margaret Garikes, Vice President of Federal Affairs, at 202-789-7409 or [margaret.garikes@ama-assn.org](mailto:margaret.garikes@ama-assn.org).

Sincerely,



James Madara, MD