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Computer & Communications Industry Association

June 26, 2009

Attention: HIT Policy Committee Meaningful Use Comments

Office of the National Coordinator for Health Information Technology
200 Independence Ave, SW
Suite 729D
Washington, DC 20201

Dear Sir or Madam:

The Computer & Communications Industry Association (CCIA) is pleased to respond to the invitation for public comments released on 16 June 2009 regarding Meaningful Use of Health Information Technology (HIT).

CCIA is the international industry association headquartered in Washington, DC that represents all aspects of the global technology industry, from computers to communications, from equipment to software, from the Internet to e-commerce and e-government. For more than 35 years CCIA has promoted open markets, open systems, open networks, and full, fair, and open competition. Taken together, CCIA's member companies employ more than 600,000 workers and generate annual revenues in excess of \$200 billion, continually investing billions in invention, innovation and economic growth.

The adoption of HIT by the American system of healthcare is an urgent and vital priority for the nation. This is true in order to ensure effective, accurate and efficient delivery of medical services to our citizens, and to finally begin to control the burgeoning costs of healthcare delivery and administration.

CCIA shares the Administration's concerns in the healthcare area and is pleased to support its efforts.

The American Recovery and Reinvestment Act of 2009 (ARRA) correctly dedicated significant public resources to advance the adoption of HIT. The critical regulatory enabler for this initiative will now be the definition of "Meaningful Use" that will be used in applying HIT to healthcare modernization. The concept proposal for "Meaningful Use" that has been released for comment sets forth many fine principles and objectives, which must be included within the eventual definition. However, for the scope of "Meaningful Use" to truly be *meaningful* the eventual definition must be broadened to include more than just the direct provision of medical care itself, but must also clearly and specifically include the electronic modernization of the administration of that healthcare in individual and group practices, as well as clinics, hospitals and other healthcare entities and facilities.

The nightmare of today's healthcare system in the United States is felt not only in terms of the lack of ubiquitous access to healthcare by all our people, but even for those with access it is often the aftershock of treatment that is experienced for months and even years as citizens wrestle with incomprehensible bills and claims, reports and communications of every kind, involving not only insurance companies but the practitioner community itself, as well as medical facilities. The result is that even when our citizens receive the medical care they need, they cannot understand what treatment they received, what they were billed, what was covered, and what they owe. A "cat's cradle" of tangled healthcare paperwork has tied the American people, and medical practitioners and institutions, in knots for many years and has gotten steadily worse, significantly increasing the cost of the U.S. healthcare system in ways that are wasteful and completely non-productive. Anyone who has given or received medical care in the United States in the last 20 years, and tried to figure out accurately what services they received and what they are financially responsible to pay, knows the nightmare of healthcare administration and the waste of time, effort and money involved in trying to manage and untangle it.

Much like the infrastructural crisis of our nation's public works systems – from decaying roads and bridges to broken water systems – the infrastructural underpinnings of the US healthcare system are dysfunctional. It is therefore critical that the definition of Meaningful Use of HIT must clearly and explicitly include the actual administration of healthcare within its meaning, down to the individual practice level, if the infrastructure of U.S. healthcare is to truly be modernized, if the content and costs of healthcare services are to be made transparent and understandable, and if those costs are to be brought under real control. Technology innovation can directly address these identified critical needs, and ensuring widespread adoption is what ARRA has set out to do. A thoughtful and inclusive definition of Meaningful Use that includes cost efficiency and cost transparency through better, modernized administration will be the triggering enabler.

Thank you for the opportunity to offer these comments from a technology industry perspective. We are confident that given the opportunity, this innovative industry can help transform healthcare in the United States and bring about beneficial change that will be felt by every American citizen.

CCIA would be pleased to continue this dialogue, and assist the National Coordinator for Health Information Technology in any way we can.

Sincerely,

A handwritten signature in black ink, appearing to read "EJ Black", with a stylized flourish at the end.

Edward J. Black,
President & CEO
Computer & Communications Industry Association