



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

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April 20, 2022

Micky Tripathi, PhD, MPP National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Re: Interoperability Standards Advisory (ISA) and the Standards Version Advancement Process (SVAP)

Dear Dr. Tripathi,

The Medical Imaging & Technology Alliance (MITA) is the leading trade association representing the manufacturers of medical imaging equipment and radiopharmaceuticals. We applaud the Office of the National Coordinator for Health Information Technology (ONC) in its work to promote the industry standards which enable continued interoperability for healthcare devices. MITA offers these comments in support of those shared goals.

We encourage ONC to advance USCDI from version 1 to version 2. Version 1 lacks support for imaging workflows, and version 2 introduces the Diagnostic Imaging data class and its associated elements, which is a substantial improvement.

We also encourage ONC to continue supporting the Digital Imaging and Communications in Medicine (DICOM) Standard and RESTful DICOMweb in the Interoperability Standards Advisory (ISA). DICOM is the international Standard for medical images and related information, and it is implemented in imaging devices for radiology, cardiology, radiotherapy, ophthalmology, and dentistry. DICOMweb and a corresponding ImagingStudy Resource in FHIR further improve the interoperability of imaging data. DICOM and DICOMweb are two of the most widely deployed healthcare messaging Standards in the world. They are well integrated into internal networks at hospitals. Continued support by ONC would boost cross-hospital network integration.

More specifically, MITA encourages ONC to incorporate the components of DICOM identified in ISO 21860, a standard which presents a portfolio of clinical imaging component standards and describes their purposes, into the ISA. Reference to DICOM via ISO 21860 would further evolve the diagnostic imaging data-class and strengthen interoperability for imaging devices in US hospitals—which would be a significant benefit to patients given the increasing frequency at which healthcare institutions work together and patients move between care providers.

Transitioning to USCDI version 2 and deepened support for DICOM components in the ISA would improve imaging data flows that remain an issue in modern health IT environments. Adoption by the Department of Veterans Affairs has resulted in easier access to the information when and where physicians need it for patient care. Even still, such recognitions would only be a first step towards a fully interoperable future. We encourage ONC to incorporate DICOM more fully into future ISA versions to reduce friction and support comprehensive interoperability.

MITA commends the ONC for its continued work towards healthcare interoperability. If you have any further questions, please do not hesitate to contact Zack Hornberger, Director of Cybersecurity & Informatics at zhornberger@medicalimaging.org or by phone at 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.