



March 18, 2020

To the Office of the National Coordinator for Health Information Technology, Department of Health and Human Services, Attention: Draft 2020-2025 Federal Health IT Strategic Plan

The Cooperative Exchange, the National Clearinghouse Association, composed of 23 member organizations, representing over 80% of the clearinghouse industry that supports over 800,000 provider organizations, through more than 7,000 payer connections and 1,000 HIT Vendors, submits the following comments regarding the “2020-2025 Federal Health IT Strategic Plan” published on January 15, 2020. Given the role that the Cooperative Exchange members play in the exchange of administrative and clinical data between HIPAA covered entities and other stakeholders, we appreciate the opportunity to provide comments for consideration.

Comments:

The Cooperative Exchange fully supports the four overarching draft plan goals focused on improving technology’s role towards directly serving patients via an interoperable health information technology infrastructure.

We acknowledge that the draft plan closely reflects the focus areas and proposed rulemaking requirements outlined in the CMS and ONC notice of proposed rulemaking published in February of 2019 ([CMS-9115-P /RIN 0938-AT79](#) and [ONC RIN 0955-AA01](#)). We strongly encourage that ONC ensure that the final 2020-2025 Federal Health IT Strategic Plan *fully align* with the anticipated CMS and ONC final rules published as an outcome from the February 2019 CMS and ONC NPRM public comment process.

Conclusion:

The Cooperative Exchange appreciates the opportunity to comment and we welcome the chance to discuss and elaborate on our comments and recommendations if needed.

Sincerely,

Mike Denison, Chair – Industry Affairs Committee, Cooperative Exchange

Crystal Ewing, Board Chair, Cooperative Exchange