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November 7, 2014

Lisa Lewis, M.P.H.
Acting National Coordinator/Chief Operating Officer
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services

Jacob Reider, M.D.
Deputy National Coordinator
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services

Dear Ms. Lewis and Dr. Reider,

On behalf of the nearly 40 member companies of the Electronic Health Record Association (EHRA), we are pleased to provide comments on the 2014 Edition Release 2 Draft Test Procedures. We appreciate the additional flexibility proposed in the test procedures, ask for clarification regarding some terminology, and request that test tools are available as the time the final rule is released. Thank you for the opportunity to provide input to this important rule on behalf of EHR developers and their customers – hospitals and ambulatory care organizations across the United States that use EHRs to care for their patients.

Sincerely,

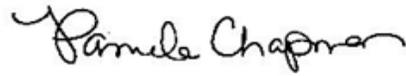
Mark Segal, PhD
Chair, EHR Association
GE Healthcare IT

Sarah Corley, MD
Vice Chair, EHR Association
NextGen Healthcare

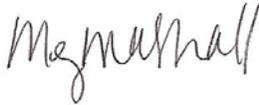
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About the EHR Association

Established in 2004, the Electronic Health Record (EHR) Association is comprised of nearly 40 companies that supply the vast majority of operational EHRs to physicians' practices and hospitals across the United States. The EHR Association operates on the premise that the rapid, widespread adoption of EHRs will help improve the quality of patient care as well as the productivity and sustainability of the healthcare system as a key enabler of healthcare transformation. The EHR Association and its members are committed to supporting safe healthcare delivery, fostering continued innovation, and operating with high integrity in the market for our users and their patients and families.

The EHR Association is a partner of HIMSS. For more information, visit www.ehrassociation.org.