July 31, 2017

Don Rucker, M.D.

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 St SW   
Floor 7  
Washington, DC 20201

***Submitted electronically***

**RE: Request for Public Comment Concerning ONC’s Proposed Interoperability Standards Measurement Framework**

Dear Dr. Rucker,

On behalf of our more than 98,000 member physical therapists, physical therapist assistants, and students of physical therapy, the American Physical Therapy Association (APTA) submits the following comments regarding the Office of the National Coordinator for Health Information Technology’s (ONC) request for public comment concerning its Proposed Interoperability Standards Measurement Framework.

The purpose of the Proposed Interoperability Standards Measurement Framework is to determine the nation’s progress in implementing interoperability standards in health information technology (health IT) and the use of the standards as a way to measure progress towards nationwide interoperability. APTA strongly supports the implementation of interoperability standards in health information technology. Physical Therapists have increasingly come to rely on the use of health information technology in their practice, and we believe that this trend is likely to accelerate in the coming years. Ensuring that IT systems are able to properly exchange information will ultimately lead to a better functioning health care system as a whole. APTA supports any standards that would lead to increased efficiencies.

APTA supports the ONC’s efforts to adopt the widespread exchange of health information through interoperable certified electronic health record (EHR) technology nationwide.

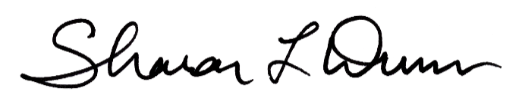
Recognition of the need to capture rehabilitative services in electronic health records (EHRs) has led to substantial growth in the development of EHR systems in the rehabilitation sector.

APTA’s development of clinical practice guidelines and other important criteria has been the basis for the attributes of many existing health information technology systems serving rehabilitative service providers.

Given that only a limited number of EHRs certified through the ONC encompass the necessary components for the documentation and transmission of information regarding physical therapy services, we hope to work with the ONC in the near future to ensure that these products are certified accordingly. To better assist physical therapists and other non-physician providers as they adopt certified EHRs within their clinics and practices, we recommend the ONC develop robust educational materials as well as provide implementation assistance and/or consultant support to such professionals.

Once again, we thank the ONC for the opportunity to comment on the Proposed Interoperability Standards Measurement Framework. We look forward to working with the ONC to develop a well-functioning interoperable health system. If you have any questions regarding our comments, please contact Kara Gainer, Director of Regulatory Affairs, at [karagainer@apta.org](mailto:karagainer@apta.org) or 703/706-8547. Thank you for your consideration.

Sincerely,



Sharon L. Dunn PT, PhD, OCS

President

SLD: kg