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December 18, 2020

The Honorable Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244-1850

Dear Administrator Verma:

The eHealth Initiative (eHI) and members of eHI's Policy Steering Committee (the undersigned) write to respectfully request an extension of the comment deadline for proposed rule entitled *Reducing Provider and Patient Burden by Improving Prior Authorization Processes, and Promoting Patients' Electronic Access to Health Information for Medicaid Managed Care Plans, State Medicaid Agencies, CHIP Agencies and CHIP Managed Care Entities, and Issuers of Qualified Health Plans on the Federally-facilitated Exchanges; Health Information Technology Standards and Implementation Specifications* (CMS-9123-P).

While we commend the administration's commitment to reducing regulatory burdens and improving patient care, the proposed rule includes highly technical provisions that warrant thorough feedback and could have a large impact on the health care system if finalized. Additionally, the proposed rule includes several requests for information (RFIs), which will be critical to future rulemaking. Given these circumstances, we request the deadline be extended to at least February 18, 2021, or 60 days after publication of the proposed rule in the Federal Register.

Thank you for your consideration and should you have any further questions regarding the request, please contact Catherine Pugh at [catherine@ehidc.org](mailto:catherine@ehidc.org).

Sincerely,

American Academy of Family Physicians  
American College of Physicians  
Change Healthcare  
Digital Health Policy Advisors, LLC  
Marshfield Clinic Health System  
Medical Group Management Association  
NextGen Healthcare