Association for Computing Machinery (ACM)
US Public Policy Council of ACM (USACM)

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May 7, 2012

Farzad Mostashari, MD, ScM
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 SW, Suite 729D
Washington, DC 20201

Re: **2014 Edition EHR Standards and Certification Criteria Proposed Rule**

Dear Dr. Mostashari:

The U.S. Public Policy Council of the Association for Computing Machinery (USACM) appreciates the opportunity to provide public comment to the Office of the National Coordinator for Health Information Technology on its Proposed Rule: Health Information Technology; Implementation Specifications, and Certification Criteria: Electronic Health Record Technology, 2014 Edition (Document ID HHS-OS-2012-0004-0001).

The Association for Computing Machinery (ACM) is the world's largest educational and scientific computing society, uniting educators, researchers and professionals to inspire dialogue, share resources and address the field's challenges. ACM strengthens the computing profession's collective voice through strong leadership, promotion of the highest standards, and recognition of technical excellence. USACM serves as the focal point for ACM's interaction with U.S. government organizations, the computing community, and the U.S. public in all matters of U.S. public policy related to information technology.

We concur with the assertion in the Federal Register announcement that "all patients should have an equal opportunity to access their electronic health information without barriers or diminished functionality or quality" and support your office's decision to adopt the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0, an international standard, and its corresponding conformance criteria. To ensure ongoing harmonization and consistency with the international standard, we recommend that you should consider referring to "WCAG 2.0 or later" to allow for updates and evolution of the referenced international standard.

It is important to note that the application of WCAG 2.0 Success and Conformance criteria to non-web services and products may pose difficulties, particularly with respect to applications, agents, and operating systems. For these situations, we encourage you to consider additional clarification and continued harmonization with WCAG 2.0 and other international standards, including the User Agent Accessibility Guidelines (UAAG) 2.0 currently being drafted.

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USACM appreciates the hard work and effort the Office of the National Coordinator and its advisory committees have given to developing the proposed revised standards and to improving accessibility of health information for all patients. We encourage your office to continue its outreach and collaboration with the HHS Office on Disability, the HHS Office for Civil Rights, and other federal entities involved in improving accessibility, such as the Access Board.

We appreciate the opportunity to provide this public comment and are available to discuss questions you may have and to provide additional information.

Sincerely,

Eugene H. Spafford, Ph.D.
Chair, ACM US Public Policy Council (USACM)

Harry Hochheiser, Ph.D.
Chair, Accessibility Committee
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