



March 16, 2026

Assistant Secretary for Technology Policy  
Office of the National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C Street SW  
Washington, D.C. 20201

Re: Diagnostic Imaging Interoperability Standards and Certification

RIN: 0955-AA11

*Submitted electronically via regulations.gov*

Dear Assistant Secretary Keane:

The Health Innovation Alliance (HIA) appreciates the opportunity to comment on the Assistant Secretary for Technology Policy (ASTP) *Request for Information: Diagnostic Imaging Interoperability Standards and Certification*.

HIA is a diverse coalition of patient advocates, health care providers, consumer organizations, employers, technology companies, and payers who support the commonsense use of data and technology to improve health outcomes and lower costs. Founded in 2007, HIA has shaped major health IT legislation, including the HITECH Act and the 21<sup>st</sup> Century Cures Act. We consistently advocate for a risk-based, innovation-forward approach to health technology oversight.

While HIA was disappointed to see the withdrawal of the prior HT11-2 imaging proposal, which we had called for in our Interoperability Workgroup Report<sup>1</sup>, we strongly agree with ASTP/ONC's framing of this RFI: the continued reliance on physical media and siloed imaging systems is hurting the health of Americans. Today's patchwork of proprietary formats and inconsistent adoption of existing standards are shoring up these silos, keeping diagnostic imaging as "read-only" assets, and blocking bidirectional sharing. To drive change and realize consistent, scalable image exchange, HIA urges ASTP/ONC to issue clear expectations on consensus-based standards, aligning with broader interoperability policies as described below. Ensuring adherence to such imaging interoperability would lessen administrative friction, eliminate redundancies and equip clinicians with complete diagnostic information when and where it is needed to support timely, high-quality care.

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<sup>1</sup> <https://health-innovation.org/wp-content/uploads/2023/06/HIAInteroperabilityReport.pdf>

We recommend:

- Finalize certification criteria. Require the ability to share images via DICOMweb and FHIR ImagingStudy resources. A "link" is a starting point for humans, but an API is required for third-party AI tools to integrate and process imaging data.
- Bridge the PACS-EHR divide. Require that Picture Archiving and Communication Systems support standards-based connections to both EHRs and cloud-based storage to ensure imaging is available to the entire care team.
- Prevent "Imaging Fees." Address the unclear application of information blocking to imaging APIs by clarifying that charging prohibitive fees for third-party apps to access imaging metadata or studies via APIs constitutes information blocking.

## Conclusion

HIA appreciates ASTP seeking public comment in this area, as we believe leadership is needed to facilitate streamlined image sharing. We stand ready to assist as the agency considers future rulemaking, so please reach out to [rdocktor@health-innovation.org](mailto:rdocktor@health-innovation.org) with any questions.

Sincerely,



Roslyn Docktor  
Executive Director  
Health Innovation Alliance