



March 15, 2010

Charlene Frizzera
Acting Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Room 445–G, Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

RE: Medicare and Medicaid Programs; Electronic Health Record Incentive Program; RIN 0938–AP78

Dear Acting Administrator Frizzera:

The Health Industry Group Purchasing Association’s Committee for Healthcare eStandards (CHeS) appreciates the opportunity to comment on the January 13, 2010, CMS Notice of Proposed Rulemaking on the Medicare and Medicaid Electronic Health Records Incentive Program.

We appreciate Congress appropriating funds through the American Recovery and Reinvestment Act (ARRA) to provide financial incentives for eligible providers and hospitals that meaningfully use Health Information Technology (HIT). We also appreciate the challenging task the Centers for Medicare & Medicaid Services has to implement ARRA.

A connected environment of HIT will transform the practice of medicine and provide a powerful tool by putting real-time, clinically relevant patient information and up-to-date clinical decision support tools in practitioners’ hands at the point of care. ARRA enables the federal government and the healthcare system to work together to achieve the goal of widespread adoption and use of HIT. It is important to note that the vision of a nationwide interoperable HIT environment can not be fully realized without an appropriate focus on the IT software and vendor solution platforms that will deliver these technologically advanced applications to the market. As a result, we believe that HIT incentive programs and “meaningful use” must also include GS1 Industry standards in connection with the medical supply chain.

GS1 Global Supply Chain Standards in health care including its Global Trade Item Number (GTIN), Global Location Number (GLN) and the Global Data Synchronization Network (GDSN). These standards will help to reduce the overall cost of health care, significantly increase supply chain efficiency and improve patient safety.

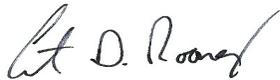
CHeS is concerned that the regulation will overlook the important GS1 Global Supply Chain Standards. We have a long-term commitment to promoting and implementing these important standards and we hope to work with you to ensure standards such as the GTIN are included in Stage 3 objectives. It should be recognized that medical supply chain standards would increase patient safety while reducing overall costs. For example, not including the GTIN in the EHR would prevent the efficient medical product recalls that can improve patient safety. Including GS1 Global Supply Chain Standards would make this important connection.

We believe the rule's criteria for eligibility of incentive payments is overly ambitious. Requiring hospitals to adopt and implement all 23 EHR requirements, or objectives, is impracticable. Many hospitals have invested significant resources into HIT and it seems unwise to implement an-all-or nothing payment mechanism. We believe a more incremental approach is required.

CHeS also believes the Medicaid incentive payments should be available to critical access, psychiatric, rehabilitation, and long-term care hospitals.

We appreciate the opportunity to comment on the proposed rule and look forward to providing ongoing input to ensure that the HIT meaningful use objectives and measures are reasonable and achievable for the entire health care delivery and support system. If you have questions about these comments, please contact John Richardson at 202.367.1239 or jrichardson@higpa.org.

Sincerely,



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cc: Vish Sankaran, Program Director, Federal Health Architecture, ONC

The Health Industry Group Purchasing Association (HIGPA) is a broad-based trade association that represents 16 group purchasing organizations, including for-profit and not-for-profit corporations, purchasing groups, associations, multi-hospital systems and healthcare provider alliances. HIGPA's mission is to advocate on behalf of health care group purchasing associations, to provide educational opportunities designed to improve efficiencies in the purchase, sale and utilization of all goods and services within the health industry and to promote meaningful dialogue between GPOs. For more information, visit www.higpa.org.