



Submitted to: <http://www.regulations.gov>

November 17, 2015

Center for Medicare & Medicaid Innovations
Department of Health & Human Services
Attention: CMS 3321-NC
P.O. Box 8016
Baltimore, MD 21244-8016

RE: CMS-3321-NC – RFI Regarding Implementation of the Merit-Based Incentive Payment System, Promotion of Alternative Payment Models, and Incentive for Participation in Eligible Alternative Payment Models

Dear Sir/Madam:

On behalf of the membership of the Pharmacy Health Information Technology Collaborative (Collaborative), we are pleased to submit comments in response to *CMS-3321-NC: RFI Regarding Implementation of the Merit-Based Incentive Payment System (MIPS), et al.*

The Collaborative's vision and mission are to assure the nation's health care system is supported by the integration of pharmacists for the provision of quality patient care, the meaningful use of health information technology (HIT), and to advocate and educate key stakeholders regarding the meaningful use of HIT and the inclusion of pharmacists within a technology-enabled integrated health care system.

In that regard, the Collaborative recommends for the benefit of patient care and system efficiencies that pharmacists be included in the list of MIPS eligible professionals (EP). As we understand, the Secretary has been given discretion to specify additional EPs as that term is defined in Section 1848(k)(3)(B) of the Act. In reviewing "Section A. The Merit-based Incentive Payment System" of this RFI, we note that pharmacists are not included as additional EPs. While it appears that the Medicare Access and CHIP Reauthorization Act of 2015 does not specifically list pharmacists as a health care professional eligible for EP designation, we appreciate CMS's support and use of regulatory discretion in helping increase patients access to health care through pharmacist-provided care.

As recognized patient-centered, health care providers and HIT users, pharmacists play an important role in providing treatments and care to patients. In some settings, pharmacists are first-line-of-care providers.

Pharmacy Health Information Technology Collaborative

| 401 Holland Lane Suite 702 | Alexandria, VA, 22314 | www.pharmacyHIT.org | 703-599-5051 |

Pharmacists are the most readily accessible health care professionals, and they are in a unique position in the health care continuum to assist in improving quality in all electronic health records (EHR) quality measure domains. Many quality measures required currently by CMS, as well as the announced HHS goals for fee-for-services in Medicare, focus on medication use and will be influenced by pharmacists. Some examples include safe and appropriate medication use, adherence, and the use of high-risk drugs for the elderly.

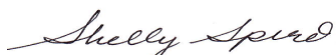
Pharmacists play an integral role in providing services and information related to medication therapy management, wellness and prevention, chronic disease management programs, safe and appropriate medication use and adherence, complex case management related to multiple medications with complex medication dosing regimens, and the use of high-risk drugs for the elderly.

The Collaborative was formed in the fall of 2010 by nine pharmacy professional associations, representing 250,000 members, and also includes associate members from other pharmacy-related organizations. The Pharmacy HIT Collaborative's founding organizations represent pharmacists in all patient care settings and other facets of pharmacy, including pharmacy education and pharmacy education accreditation. The Collaborative's Associate Members represent e-prescribing and health information networks, a standards development organization, transaction processing networks, pharmacy companies, system vendors and other organizations that support pharmacists' services. For additional information, visit www.pharmacyhit.org

On behalf of the Pharmacy HIT Collaborative, thank you again for the opportunity to comment on *CMS-3321-NC: RFI Regarding Implementation of the Merit-Based Incentive Payment System (MIPS), et al.*

For more information, contact Shelly Spiro, executive director, Pharmacy HIT Collaborative, at shelly@pharmacyhit.org.

Respectfully submitted,



Shelly Spiro, RPh, FASCP
Executive Director
Pharmacy HIT Collaborative