



Pharmacy e-Health Information Technology Collaborative

Federal Advisory Committee HIT Standards Committee (HITSC) Meeting, September 19, 2012

Comments made by Shelly Spiro, Pharmacy e-HIT Collaborative Executive Director

My name is Shelly Spiro; I'm the Executive Director of Pharmacy e-HIT Collaborative (Collaborative) representing over 250,000 members of the majority national pharmacy associations and key pharmacy organizations involved in Health IT. Pharmacists play an integral role in the inter-professional healthcare team in providing medication related services outside and in conjunction with the prescription dispensing functions. Pharmacists are in a unique position to engage patients and care givers more often than others receiving meaningful use (MU) incentives. Providing patients with an accurate and meaningful active medication list is a high priority for pharmacist.

Pharmacists are highly trained as medication management experts. Over several years, the Collaborative and its members have been working with National Council for Prescription Drug Programs (NCPDP) and Health Level Seven (HL7) on standards that will assist pharmacists in standard documentation of these patient care services (e.g. Medication Therapy Management (MTM) as required by the Medicare Part D program, some Medicaids and private insurers). One such standard is a joint project between NCPDP and HL7 for a structured document Consolidated Clinical Document Architecture (CCDA) Implementation Guide (IG) to meet the Center for Medicare & Medicaid Services (CMS) required Part D patient "take away" document after an annual comprehensive medication review (CMR). This structured document contains a pharmacist-provided reconciled active medication list, allergy list, indication for each active medication, and special instructions for the patient in easily understandable language. The IG supports RxNORM and SMOMED-CT codes. This CMS regulatory requirement goes into effect January 1, 2013.

The Collaborative is a committed member of the S&I Framework Blue Button Work Group in hopes of driving industry adoption of this MTM CCDA IG containing a pharmacist reconciled active medication list. Without adoption of this electronic form millions of Medicare Part D beneficiaries and care coordinators will be forced to use a manually produced form. The pharmacist industry without receiving incentives for MU is working to ensure our patients have the ability to electronically receive pharmacist-provided reconciled med list and easy understandable instructions

As a start, the Collaborative is interested in the HITSC recommending CMS recognize a standard electronic version of this Medicare Part D patient "take away" document as the result of the January 1, 2013 Medicare Part D annual CMR regulatory requirement.

We applaud ONC's patient engagement initiatives and speaking on behalf of our nations pharmacists we have developed a valid medication reconciliation solution for meaningful users in all practice settings.

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Thank you,

Response from Chair Jonathan Perlin, Hospital Corporation of America *“thank you for your comments and for the important work you are doing”*.

Tweet from Farzad Mostashari@Farzad_ONC member of HITSC and ONC National Coordinator:
#HITstandards Shelly Spiro: key role for pharmacists in healthIT-enabled quality improvement. CCDA for PartD med mgmt take-away document