



Via Electronic Submission to: <http://www.regulations.gov>

February 1, 2016

Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS- 3323-NC
7500 Security Boulevard
Baltimore, MD 21244-1850

**Re: CMS-3323-NC – Request for Information: Certification Frequency
and Requirements for the Reporting of Quality Measures under CMS Programs**

Dear Sir/Madam:

On behalf of the membership of the Pharmacy Health Information Technology Collaborative (Collaborative), we are pleased to submit comments for the *Request for Information: Certification Frequency and Requirements for the Reporting of Quality Measures under CMS Programs*.

The Collaborative is supportive of testing and recertifying health IT modules (including CEHRT) in accordance with ONC Health IT Certification Program requirements.

Although pharmacists are ineligible for electronic health record (EHR) incentives, pharmacists provide patient-centered care and services and are part of many integrated health care teams comprising eligible professionals (EPs), eligible hospitals, and critical access hospitals (CAHs) that are directly affected by reporting quality measures under CMS programs.

The following are our comments for CMS- 3323-NC: *Request for Information: Certification Frequency and Requirements for the Reporting of Quality Measures under CMS Programs*.

What are the benefits of requiring additional testing and recertification?

The Collaborative believes that periodically requiring additional testing and recertifying existing certified EHR products with the annual updates provided would improve standardization and encourage health IT developers and vendors to create products that go beyond minimum clinical quality measures (CQMs) thresholds. This

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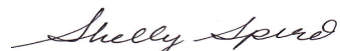
could lead providers toward more detailed and better reporting. As standards for electronically representing CQMs continue to evolve, retesting certified health IT modules periodically may also ensure that CQMs are being represented and calculated accurately.

The Pharmacy HIT Collaborative's vision and mission are to assure the nation's health care system is supported by meaningful use of HIT, the integration of pharmacists for the provision of quality patient care, 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. 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 the request for information of *Certification Frequency and Requirements for the Reporting of Quality Measures under CMS Programs*.

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

Respectfully submitted,



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