



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

May 2, 2016

Michael Lipinski, Office of Policy  
Department of Health and Human Services  
Office of the National Coordinator  
for Health Information Technology  
Mary E. Switzer Building  
330 C Street, SW  
Washington, DC 20201

**Re: ONC Health IT Certification Program: Enhanced Oversight and Accountability**

Dear Mr. Lipinski:

On behalf of the membership of the Pharmacy Health Information Technology Collaborative (Collaborative), we are pleased to submit comments for the proposed *ONC Health IT Certification Program: Enhanced Oversight and Accountability* rule.

The Collaborative and its member organizations are supportive of continued certification criteria and standards for health IT and EHR. The Collaborative has been involved with the ONC and the Center for Medicaid and Medicare Services since the early development of these standards and criteria as they apply to the Meaningful Use EHR Incentive Program and their affect on non-eligible pharmacist health care providers.

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).

In general, the Collaborative supports the proposed rule. There is one part of the preamble, however, in which we have concern. As we note in the general comments section, our concern is with the potential cost estimates to health providers if a certification termination occurs, especially with regard to health care providers, such as pharmacists, who are not eligible to participate in the EHR Incentive Program. The proposal provides no remedies. Although pharmacists are ineligible to participate in the EHR Incentive Programs, they are part of integrated health care teams that include

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eligible professionals (EPs), critical access hospitals (CAHs), and eligible hospitals, and they are users of the same certified health IT. Without remedies, the costs associated with a termination would be a financial burden.

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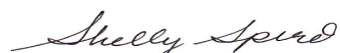
The Pharmacy HIT Collaborative's vision and mission are to assure the nation's health care system is supported by meaningful use of HIT, the integration of pharmacists for the provision of quality patient care, and to advocate and educate key stakeholders regarding the meaningful use of HIT and the inclusion 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](http://www.pharmacyhit.org).

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On behalf of the Pharmacy HIT Collaborative, thank you again for the opportunity to comment on the *ONC Health IT Certification Program: Enhanced Oversight and Accountability* rule.

For more information, contact Shelly Spiro, Executive Director, Pharmacy HIT Collaborative, at [shelly@pharmacyhit.org](mailto:shelly@pharmacyhit.org).

Respectfully submitted,



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