Comments made by Shelly Spiro, Pharmacy HIT Collaborative Executive Director

My name is Shelly Spiro; I'm the Executive Director of Pharmacy HIT Collaborative representing over 250,000 members of the majority national pharmacy associations and key pharmacy organizations involved in Health Information Technology (IT). On December 12, 2013, I testified to ONC HIT Policy Committee’s Certification and Adoption Workgroup regarding the pharmacists and pharmacy clinical perspective on voluntary EHR certification for the Long-Term and Post Acute Care (LTPAC) settings.

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 structured documentation of these patient care services (e.g. Medication Therapy Management (MTM) as required by the Medicare Part D program, some Medicaid 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).

The Pharmacy HIT Collaborative worked with NCPDP and HL7 in the development of an American National Standards Institute (ANSI) accredited Pharmacist/Pharmacy Provider Electronic Health Record (EHR) functional profile designed to facilitate capturing of clinical medication-related data at the point of care in a single logical health record. The functional profile specifies the requirements needed to support messaging among prescribers, pharmacists or pharmacy providers, and other health care entities benefiting from medication-related information.

LTPAC and BH voluntary EHR certification program can assist with improving medication management and the Collaborative supports these efforts. We ask that ONC supports a similar focus by providing guidance for pharmacist and pharmacy to implement voluntary EHR certification in all practice settings.

Thank you,

Respectfully submitted,
Shelly Spiro, RPh, BSPharm, FASCP

Response: None