



Pharmacy e-Health Information Technology Collaborative

March 25, 2011

Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850
Cynthia G. Tudor, Ph.D., Director
Medicare Drug Benefit and C & D Data Group
partd_mtm@cms.hhs.gov

RE: Standardized Format for the Comprehensive Medication Review Action Plan and
Summary – Request for Comment

Dear Dr. Tudor,

The Pharmacy e-Health Information Technology Collaborative (Collaborative) is pleased to provide comments to the Centers for Medicare and Medicaid Services (CMS) request for comments regarding “Standardized Format for the Comprehensive Medication Review Action Plan and Summary”.

The Collaborative recommends that data requirements for MTM electronic transactions are incorporated into the “Standardized Format for the Comprehensive Medication Review Action Plan and Summary”. This would assure completion of the forms for the patient is driven off existing electronic data elements so that rekeying will not be necessary. This recommendation is supported through the American National Standards Institute (ANSI) Standard Development Organizations including National Council for Prescription Drug Programs (NCPDP), Accredited Standards Committee (ASC X12), and Health Level Seven (HL7) processes to assure Medication Therapy Management Services (MTMS) electronic standard transactions are developed. The Collaborative supports and works with these organizations to make certain data elements such as those in the proposed forms are populated from the “Pharmacist EHR” and or other types of interoperable electronic systems.

Formed in the fall of 2010, the Collaborative’s focus is to assure the meaningful use (MU) of standardized electronic health records (EHR) supports safe, efficient, and effective medication use, continuity of care, and provides access to the patient-care services of pharmacists with other members of the interdisciplinary patient care team. The Collaborative assures the pharmacist’s role of providing patient-care services are integrated into the National HIT interoperable framework. The group is pursuing EHR standards that effectively support the delivery and documentation of, and billing for pharmacist-provided patient care services across all care settings.

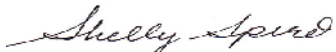
The Collaborative seeks to ensure that pharmacist-provided patient care services in all practice settings are represented in the MU of EHR. The Collaborative’s founding organizations represent pharmacists in all patient care settings and other facets of pharmacy, including pharmacy education and pharmacy education

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accreditation. The Collaborative's Associate Members represent e-prescribing networks, a standards development organization, and a transaction processing network. The Collaborative was founded by the Academy of Managed Care Pharmacy (AMCP), Accreditation Council for Pharmaceutical Education (ACPE), American Association of Colleges of Pharmacy (AACP), American College of Clinical Pharmacy (ACCP), American Pharmacists Association (APhA), American Society of Consultant Pharmacists (ASCP), American Society of Health-System Pharmacists (ASHP), National Alliance of State Pharmacy Associations (NASPA), and National Community Pharmacists Association (NCPA) representing over 250,000 members that includes associate members from other pharmacy related organizations (Surescripts, National Council for Prescription Drug Programs (NCPDP), and RelayHealth). For additional information, visit www.pharmacye-hit.org.

The Collaborative welcomes the opportunity to work with CMS to address the need to support standardized electronic data requirements for the "Standardized Format for the Comprehensive Medication Review Action Plan and Summary". For more information, contact Shelly Spiro, Director, Pharmacy e-HIT Collaborative at shelly@pharmacye-hit.org. Respectfully submitted,



Shelly Spiro
Director, Pharmacy e-HIT Collaborative