



Pharmacy e-Health Information Technology Collaborative

October 21, 2010

The Honorable Kathleen Sebelius
Secretary
United States Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Delivered by email: Kathleen.Sebelius@hhs.gov

Dear Secretary Sebelius,

The Pharmacy e-Health Information Technology Collaborative is an organization founded by nine unified pharmacist organizations to ensure that pharmacist-provided clinical services are represented in the electronic health record (EHR). The founding organizations of the Collaborative represent pharmacists working in all patient care settings within the health care system, in addition to many other facets of pharmacy including pharmacy education and pharmacy education accreditation.

The goal of interoperable EHR systems in health care is to ensure that patients receive safe and effective treatment leading to positive health outcomes. Pharmacists, in managing the medication use process, serve an integral role in the provision of patient care that leads to improved health in patients. Pharmacists practice in diverse patient care settings and utilize Health Information Technology (HIT) systems to safely and effectively distribute medications to patients and to work collaboratively with other members of the health care team to optimize appropriate medication use, reduce medication-related problems, and improve overall health outcomes through the provision of medication therapy management services to patients. The Collaborative strives to ensure that the needs of pharmacists providing medication management, other clinical services and the use of the electronic prescription process are addressed and integrated into the national HIT and EHR framework.

In order to provide optimal care for patients, pharmacists must be able to access information contained in interoperable, certified EHR systems and document care in those systems. Bi-directional interoperability and functionality between pharmacy information systems and certified EHR systems is a necessity. We recognize the need for pharmacist/pharmacy information systems to contain functionality for the exchange of clinical information via EHRs, and express our willingness to work with all stakeholders, particularly your agency, to that end.

As HHS proceeds with implementation of the HITECH Act provisions of the American Recovery and Reinvestment Act of 2009 (P.L. 111-16) our Collaborative urges you to consider the HIT needs of pharmacists and the important contributions they make in improving patient care. Pharmacists are not currently included as "eligible professionals" under the general funding provisions of the law and thus are not eligible to receive standard grants. However, as specified in 3011(a)(2) a portion of the \$2 billion that Congress appropriated for health information technology (under Section 3018) is intended to be dedicated to "development and adoption of appropriate certified electronic health records for categories of health care providers not eligible for support under title XVIII or XIX of the Social Security Act for the adoption of such records." Pharmacists qualify under 3011(a)(2), because they are not eligible for incentive payments under other provisions of the law. Because of the critical role pharmacists serve in increasing access and quality of care while decreasing costs, we ask that you consider allocating an adequate portion of Section 3018 discretionary funds for the HIT design, development, and implementation needs of the pharmacy sector and pharmacists providing clinical care.

Specific areas where the Collaborative feels that Section 3018 discretionary funds could be appropriately allocated to address the needs in the pharmacy sector include:

- Funding to support the development, design and infrastructure of certified pharmacy management systems that contain EHR functionality, support interoperability with health information exchanges and are integrated with pharmacy dispensing systems
- Funding for pharmacists providing clinical services to plan for and purchase certified pharmacist EHR systems (funding should cover the basic installation and communication infrastructure)
- Funding for EHR systems for providers who currently do not have access to such systems, especially pharmacists in underserved communities and rural areas
- Expansion of funding for state HIT and Health Information Exchange (HIE) initiatives that include pharmacists providing clinical services in their governance and in their priority use cases to support medication reconciliation and medication therapy management for individuals receiving care within the full range of health care settings
- Funding for Regional Extension Centers to leverage initial funding and expand their scope of work by providing technical assistance to pharmacy practitioners in their regions

We request the opportunity to meet with your office as soon as possible to discuss how we can work collaboratively to advance HIT in the pharmacy sector and to discuss potential opportunities to allocate appropriate funding under Section 3011(a)(2). Pharmacists are critical to the team-based approach to patient care and pharmacists provide unique contributions to the “meaningful use” of EHR measurement goals. We assert that pharmacists should be recognized as “eligible professionals” in this provision and in any future legislation and regulations intended to build the U.S. EHR infrastructure.

We thank you for your guidance in the implementation of the HITECH Act. We look forward to working with you and your staff on these issues and additional areas of interest. We will follow up with your office to schedule a meeting.

Sincerely,

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Pharmacy e-Health Information Technology Collaborative

About the Pharmacy e-Health Information Technology Collaborative Founding Members:

The Academy of Managed Care Pharmacy (AMCP) is a national professional association of pharmacists and other health care practitioners who serve society by the application of sound medication management principles and strategies to improve health care for all. The Academy's 5,700 members develop and provide a diversified range of clinical, educational and business management services and strategies on behalf of the more than 200 million Americans covered by a managed care pharmacy benefit.

Accreditation Council for Pharmacy Education (ACPE) is the national agency for the accreditation of professional degree programs in pharmacy and providers of continuing pharmacy education. ACPE was established in 1932 for the accreditation of pre-service education, and in 1975 its scope of activity was broadened to include accreditation of providers of continuing pharmacy education.

The American Association of Colleges of Pharmacy (AACP) founded in 1900, AACP is a national organization representing the interests of pharmacy education and educators. Comprising 120 accredited colleges and schools of pharmacy including more than 6,096 faculty, 54,700 students enrolled in professional programs and 5,400 individuals pursuing graduate study, AACP is committed to excellence in pharmacy education. Visit www.aacp.org to learn more about AACP.

The American College of Clinical Pharmacy (ACCP) is a professional and scientific society that provides leadership, education, advocacy, and resources enabling clinical pharmacists to achieve excellence in practice and research. ACCP's membership is composed of practitioners, scientists, educators, administrators, students, residents, fellows, and others committed to excellence in clinical pharmacy and patient pharmacotherapy.

The American Pharmacists Association (APhA), founded in 1852 as the American Pharmaceutical Association, represents more than 62,000 practicing pharmacists, pharmaceutical scientists, student pharmacists, pharmacy technicians, and others interested in advancing the profession. APhA, dedicated to helping all pharmacists improve medication use and advance patient care, is the first-established and largest association of pharmacists in the United States. APhA members provide care in all practice settings, including community pharmacies, health systems, long-term care facilities, managed care organizations, hospice settings, and the uniformed services.

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The American Society of Consultant Pharmacists (ASCP) is the international professional association that provides leadership, education, advocacy, and resources to advance the practice of senior care pharmacy. ASCP's 8,000+ members manage and improve drug therapy and improve the quality of life of geriatric patients wherever they reside including nursing facilities, sub acute care and assisted living communities, psychiatric hospitals, hospice programs, and in their own homes.

The American Society of Health-System Pharmacists (ASHP), for more than 60 years, has helped pharmacists who practice in hospitals and health systems improve medication use and enhance patient safety. The Society's 35,000 members include pharmacists and pharmacy technicians who practice in inpatient, outpatient, home-care, and long-term-care settings, as well as pharmacy students. For more information about the wide array of ASHP activities and the many ways in which pharmacists help people make the best use of medicines, visit ASHP's website, www.ashp.org, or its consumer website, www.safemedication.com

The National Alliance of State Pharmacy Associations (NASPA) promotes leadership, sharing, learning, and policy exchange among pharmacy leaders nationwide, and provides education and advocacy to support pharmacists, patients, and communities working together to improve public health. NASPA was founded in 1927 as the National Council of State Pharmacy Association Executives (NCSPAEE).

The National Community Pharmacists Association (NCPA®) represents America's community pharmacists, including the owners of more than 22,700 independent community pharmacies, pharmacy franchises, and chains. Together they represent an \$88 billion health-care marketplace, employ over 65,000 pharmacists, and dispense over 40% of all retail prescriptions. To learn more go to www.ncpanet.org or read NCPA's blog, The Dose, at <http://ncpanet.wordpress.com>.