VIA Electronic Submission to
http://healthit.hhs.gov/blog/faca/index.php/2011/04/19/privacy-security-tiger-team-seeks-feedback-on-framework-for-electronic-health-information-exchange/#respond

May 9, 2011

Re: Policy and Technology Framework for Health Information Exchange (HIE): Privacy and Security Issues

   On behalf of the membership of the Pharmacy e-Health Information Technology Collaborative (Collaborative), we are pleased to submit brief comments in response to the Policy and Technology Framework for HIE released by the Office of the Nation Coordinator's (ONC) Tiger Team on April 19, 2011. The Collaborative supports technological developments and policy actions related to the privacy and security of health data as long as pharmacists are recognized as providers of patient care services and are not limited by any provision exclusion, such as minimum necessary requirements.

   These comments focus on the need to recognize pharmacists as providers that may receive health information through HIEs consistent with accepted privacy and security standards. Formed in the fall of 2010, the Collaborative's focus is to assure the meaningful use (MU) of standardized electronic health records (EHRs) supports safe, efficient, and effective medication use, continuity of care, and provides access to the patient-care services provided by pharmacists with other members of the interdisciplinary patient-care team. The Collaborative's goal is to assure that the pharmacist's role of providing patient-care services is integrated into the National HIT interoperable framework. The group is pursuing EHR standards that effectively support the delivery, 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 EHRs. The 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 networks, a standards development organization, and a transaction processing network. The Collaborative was founded by nine pharmacy professional associations representing over 250,000 members and includes three associate members from other pharmacy related organizations. For additional information, visit www.pharmacye-hit.org.

   The Collaborative believes that the inclusion of pharmacists' clinical services is critical to achieving the new focus areas identified by ONC in its Federal Health IT Strategic Plan 2011-

2015 (Strategic Plan) updated on March 25, 2011 and other objectives. The current federal HIT infrastructure limits pharmacists' exchange of information to electronic prescribing. Data elements exchanged through electronic prescribing systems are generally limited to minimal patient and provider information in addition to the information on the medications prescribed. Much more extensive clinical information is necessary for pharmacists to implement patient-care recommendations, including in the exchange of information among HIEs. To fully achieve the desired health outcomes of a fully integrated interoperable HIT environment, ONC must consider the inclusion of pharmacists as a component of the EHR information exchange, which currently is not the case.

Pharmacists providing patient care services need a standard EHR to document and electronically exchange health information with other healthcare providers. For pharmacists to be meaningful users of the EHR, the Collaborative members worked with standard development organizations to develop the Pharmacist/Pharmacy Provider EHR (PP-EHR) functional profile. The PP-EHR was developed by a joint Health Level Seven (HL7) and National Council for Prescription Drug Programs (NCPDP) work group and it has been approved through the balloting process of both organizations.

The Collaborative recommends that the PP-EHR, once certification criteria are defined and the PP-EHR is certified by the nationally recognized EHR certification organizations, be integrated with other certified healthcare EHRs and ultimately to share information in HIEs. The PP-EHR will support the exchange of clinical information (e.g., CCD), will leverage existing interoperability specifications (e.g., HITSP C83, ISO7 and ISO9), utilize existing standards (e.g. HL7 and NCPDP), and will support data flow that can be tested.

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On behalf of the Pharmacy e-HIT Collaborative, thank you again for the opportunity to comment on the Policy and Technology Framework for HIE: Privacy and Security Issues and the work of ONC to establish the nationwide HIT infrastructure. For more information, please contact Shelly Spiro, Director, Pharmacy e-HIT Collaborative at shelly@pharmacye-hit.org.

Respectfully submitted,
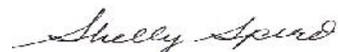
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