



Pharmacy Health Information Technology Collaborative

Via Electronic Submission to: ProgramIntegrityRFI@cms.hhs.gov and
AIProgramIntegrityRFI@cms.hhs.gov

November 20, 2019

Ms. Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: RFI CMS Action Plan to Prevent Opioid Addiction
P.O. Box 8016
Baltimore, MD 21244-8016

**Re: RFI on the Future of Program Integrity and
RFI Using Advanced Technology in Program Integrity**

Dear Administrator Verma:

On behalf of the membership of the Pharmacy Health Information Technology Collaborative (Collaborative), we are pleased to submit comments regarding the Center for Program Integrity's *Request for Information on the Future of Program Integrity* and *Request for Information on Using Advanced Technology in Program Integrity*.

The Collaborative has been involved with the federal agencies, including the Office of the National Coordinator (ONC) and the Centers for Medicare & Medicaid Services (CMS), developing the national health information technology (HIT) framework since 2010.

Pharmacists provide essential patient-centered care and services to Medicare and Medicaid patients. Pharmacists are users of health IT, and in particular, e-prescription and EMR (EHR) systems. The Collaborative supports the use of these systems, which are important to pharmacists in working with other health care providers to provide needed medications and transmit patient information related to overall patient care, transitions of care, immunization (historical and administered), immunization registry reporting, medication lists, medication allergies, allergy reactions, patient problem lists, smoking status, reporting to public health agencies, clinical decision support services/knowledge artifacts, drug formulary checking, and electronic prescribing.

The following are our comments regarding specific questions posed in the *Request for Information on the Future of Program Integrity* and *Request for Information on Using Advanced Technology in Program Integrity*.

RFI Future of Program Integrity

3. Prior Authorization in Medicare FFS Questions

10. *Can clinical decision support tools play a role in prior authorization? If yes, how?*
14. *Are there other issues with respect to prior authorization that CMS should consider?*

Comments

Clinical decision support (CDS) tools used by pharmacists, physicians, and other health care practitioners can provide significant time and cost savings in existing prior authorization (PA) processes that ultimately would aid in producing effective outcomes for patients and payers and reduce providers' (practitioners) administrative burdens.

The Collaborative supports the use of clinical decision support tools (e.g., NCPDP, HL7 FHIR-based CDS Hooks) that are efficient for vendors and providers and integrate the PA process into electronic health records (EHR). This integration allows information to be sent to the patient so that the patient can work with the health care provider.

The Collaborative recommends that CMS ensure any change considered for PA to improve program integrity fits with a provider's workflow.

RFI Using Advanced Technology in Program Integrity

Questions for Health Care Providers and Suppliers

23. *Are there key factors, themes, and/or lessons related to AI tools that should be considered?*

Comments

Generally, the Collaborative supports the concept of using artificial intelligence (AI) in CDS provided the AI is designed using United States evidence-based guidelines and sufficient data. Provider and patient education regarding CDS, including CDS use limitations, and approval and/or certification may also be warranted. Patient safety should be among the top factors related to AI tools that should be considered.

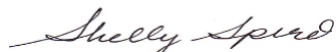
The Pharmacy HIT Collaborative comprises the major national pharmacy associations, representing 250,000 members, including those in pharmacy education and accreditation. The Collaborative's membership is composed of the key national pharmacy associations involved in health information technology (HIT), the National Council of Prescription Drug Programs, and nine associate members encompassing e-prescribing, health information networks, transaction processing networks, pharmacy companies, system vendors, pharmaceutical manufacturers, and other organizations that support pharmacists' services.

As the leading authority in pharmacy health information technology, the Pharmacy HIT Collaborative's vision and mission are to ensure the U.S. health IT infrastructure better enables pharmacists to optimize person-center care. Supporting and advancing the use, usability, and interoperability of health IT by pharmacists for person-centered care, the Collaborative identifies and voices the health IT needs of pharmacists; promotes awareness of functionality and pharmacists' use of health IT; provides resources, guidance, and support for the adoption and implementation of standards driven health IT; and guides health IT standards development to address pharmacists' needs. For additional information, visit www.pharmacyhit.org.

On behalf of the Pharmacy HIT Collaborative, thank you again for the opportunity to comment on the *Request for Information on the Future of Program Integrity and Request for Information Using Advanced Technology in Program Integrity*.

For more information, contact Shelly Spiro, executive director, Pharmacy HIT Collaborative, at shelly@pharmacyhit.org.

Respectfully submitted,



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