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## **HIMSS Electronic Health Record Association Comments on the Accountable Care Organization NPRM**

**CHICAGO (June 14, 2011)** – The HIMSS Electronic Health Record Association (EHR Association), a collaboration of 46 EHR supplier companies, has submitted its comments on the Accountable Care Organization (ACO) Shared Savings Notice of Proposed Rule-Making (NPRM), with specific focus on the health IT aspects of the proposed rule, as well as aspects of the proposed rule that would benefit from more health IT utilization.

“The concept of the ACO, with provider accountability for cost containment and quality improvement, represents a real effort towards building a new value-driven healthcare system to address the critical shortcomings in the current payment model,” said Leigh Burchell, Vice President of Government Affairs and Public Policy for Allscripts and Chair of the EHR Association Public Policy Leadership Work Group. Ms. Burchell went on to say, “Ultimately, we need to improve care coordination for individuals, improve population health, and lower the growth in healthcare-related expenditures. ACOs, if established properly, can be an important tool in accomplishing these objectives.”

The Association commented favorably on the general approach to health information technology (HIT) in the NPRM, which refrained from being prescriptive on when and how ACO’s would use HIT for such areas as care coordination and patient engagement.

Ms. Burchell added, “We appreciate that CMS recognized in the proposed rule that ACOs may take different forms and approaches, following different health IT strategies. But we do request that CMS recognize in the final rule that ACO success will depend on robust IT infrastructure, strong technology leadership, and use of bi-directional, standards-based health information exchange and interoperability.”

While recognizing the importance of accountable care and the promise of ACOs, the Association did comment that it shares the concerns of many industry stakeholders that the ACO Shared Savings proposed rule, as currently formulated, will substantially limit initial participation by constraining the ability of ACOs to invest in needed infrastructure and to operate effectively given the relatively high risk/reward ratio.

The EHR Association identified several other areas in which the ACO Shared Savings proposal could be strengthened, including quality reporting initiatives. “Our customers – hospitals and physicians’ practices across the country – have reporting

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requirements related to many different programs already in place or in development. We hope CMS will recognize and minimize the impact on providers and software developers by aligning and avoiding duplication of measures,” added Carl Dvorak, Executive Vice President at Epic Systems and Chair of the EHR Association.

Dvorak went on to say, “As vendors, we recognize the importance of ensuring that our customers are prepared and successful in supporting new aspects of payment reform and quality measurement. We provide our feedback on ACOs with the hope that we can ensure our customers’ ultimate success should they chose to participate in this program.”

The Association also expressed strong support for CMS’s decision to exclude eligible professional meaningful use incentive payments from ACO shared savings calculations, and proposed extending this exclusion to eligible hospitals as well. Such exclusions would avoid penalizing professionals and hospitals for having previously earned incentive payments.

Fundamentally, the EHR Association recognizes the key role of health IT in successful ACO deployment, and welcomes the opportunity to engage in ongoing dialog about how key stakeholders can collaborate to make this program successful.

**About the HIMSS EHR Association**

The HIMSS EHR Association is a trade association of 46 electronic health record (EHR) companies that join together to lead the health IT industry in the accelerated adoption of electronic health records in hospital and ambulatory care settings in the US. The Association provides a leadership forum for the EHR software provider community to speak with a unified voice relative to standards development, the EHR certification process, interoperability, performance and quality measures, and other EHR issues as they become subject to increasing government, insurance and provider-driven initiatives and requests. Membership is open to HIMSS Corporate Members companies that design, develop and market their own EHRs. The Association is a partner of the Healthcare Information and Management Systems Society (HIMSS) and operates as an independent organizational unit within HIMSS. For more information, visit <http://www.himssEHRA.org>.

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