# HiMSS Electronic Health Record Association

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January 26, 2017

Centers for Disease Control and Prevention
Department of Health and Human Services
2920 Brandywine Road, Room 3000
Atlanta, Georgia 30341-4146
Re: 2017-RFI-CDS-0001

Dear Ms. Peel,

Thank you for this opportunity to provide comments on the CDC's efforts related to clinical decision support development and implementation. Established in 2004, the Electronic Health Records Association (EHRA) brings together companies that develop, market, and support electronic health records (EHRs) to collaborate on issues of importance to our companies and, notably, to our collective customers – hospitals, healthcare organizations, and clinicians that represent the majority of EHR users in the US. We work together to speak with a unified voice on these topics in a non-competitive, collegial effort to understand, educate, and collaborate with all stakeholders engaged with EHRs and health IT.

As health IT developers, we have significant experience developing and assisting healthcare organizations in deploying clinical decision support tools, many of which are based on CDC guidance. That experience informs our feedback here.

We appreciate the recognition that there are many stakeholders with interest in CDC guidance and that electronic health record developers and their users are some of those stakeholders. Electronic health records include many features used by clinicians to provide timely and appropriate care. Some of the features include:

- Configurable clinical decision support interventions
- Access to indexed clinical reference materials
- Access to indexed patient-specific education materials
- Filtered lists of patients by condition and other factors
- Submission (using HL7 standard formats) of public health data such as immunizations or reportable labs

The features mentioned above as examples are all part of the ONC certification criteria, in the 2011, 2014, and 2015 certification editions. We encourage CDC to reference the ONC certification criteria standards; providing reference materials in formats that align with standards that EHRs have already invested in to comply with ONC's requirements will speed adoption.

You asked about barriers to submission of public health data, and one such barrier is deviations from the standards required by certification, as referenced above. In our experience, it is common for state or local public health agencies to not implement the standards for content and transport required by certification and thus used by EHR developers. Such variance makes it more challenging to connect healthcare organizations to public health entities in all states.

EHRA has actively participated in meetings hosted by ONC to collaborate on Zika as one opportunity to use health IT for effective screening and treatment. We believe that EHRs are a trusted and efficient tool to provide timely information to clinicians and to help clinicians remain current with CDC guidance. We appreciate recent work done by CDC and EHR workgroups on expressing CDC guidance in a flow chart intended to assist in translating CDC guidance into electronic health records. As discussed in the recent ONC meeting, we see further opportunity for CDC to express guidance in machine-readable formats and standard clinical terminologies. This would expedite the availability of such guidance to clinicians by reducing the need for human interpretation of the CDC guidance into clinical decision support tools. We would be happy to participate with CDC in further work in this area.

Thank you again for your consideration.

Sincerely,

Sasha TerMaat
Chair, EHR Association
Epic

Richard Loomis, MD
Vice Chair, EHR Association
Practice Fusion

**HIMSS EHR Association Executive Committee**

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**About the EHR Association**

Established in 2004, the Electronic Health Record (EHR) Association is comprised of over 30 companies that supply the vast majority of EHRs to physicians' practices and hospitals across the United States. The EHR Association operates on the premise that the rapid, widespread adoption of EHRs will help improve the quality of patient care as well as the productivity and sustainability of the healthcare system as a key enabler of healthcare transformation. The EHR Association and its members are committed to supporting safe healthcare delivery, fostering continued innovation, and operating with high integrity in the market for our users and their patients and families.

The EHR Association is a partner of HIMSS. For more information, visit www.ehrassociation.org.