MAGEE
REHABILITATION
HOSPITAL

Jack Carroll, PhD, MHA
President and CEO

February 6, 2014

Dr. Karen B. DeSalvo
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
200 Independence Avenue S.W.
Suite 729-D
Washington, D.C. 20201

Re: Federal Health IT Strategic Plan 2015-2020 Draft

Dear Dr. DeSalvo:

Please accept this letter on behalf of Magee Rehabilitation Hospital expressing our support of the goals outlined in the Office of the National Coordinator for Health Information Technology's "Federal Health IT Strategic Plan 2015-2020."

Magee would like to specifically commend goal one of the report, which "aims to expand health IT adoption and use efforts across the care continuum, emphasizing assistance for health care providers serving long-term and post-acute care, behavioral health, community based, and other populations ineligible to participate in the Medicare and Medicaid Electronic Health Records (EHR) Incentives Programs."

Our hospital is an independent, 96-bed, post-acute nonprofit facility that provides physical and cognitive rehabilitation services to the Greater Philadelphia community. We employ over 600 staff, and Magee is nationally recognized for outstanding programs in physical and cognitive rehabilitation. Our organization has comprehensive services for spinal cord injury, brain injury, stroke, orthopedic replacement, and amputation. Magee, in conjunction with Thomas Jefferson University Hospital, serves as the federally designated Regional Spinal Cord Injury Center of Delaware Valley. Only fourteen such centers exist in the country. Magee is also a founding member of The Christopher and Dana Reeve Foundation NeuroRecovery Network, which provides state of the art rehabilitation therapy.

As an independent, standalone post-acute rehabilitation hospital, Magee is presently ineligible to receive financial incentives from the Centers for Medicare and Medicaid Services to install the EHR system in our inpatient hospital. Given the significant expenses associated with implementing an EHR system, patients utilizing post-acute hospital care such as that offered by Magee, are often unable to benefit from a more connected healthcare continuum, and the safety and quality that comes with immediate accessibility of medical records.

EHR that integrate with broader Health Information Exchanges (HIE), currently being created at the state level with federal support, are essential to reducing healthcare costs and improving patient health outcomes. We are hopeful to have the opportunity to be eligible to receive financial incentives through the Meaningful Use Program to implement electronic health records for our inpatient hospital in the future, and more generally to have the post-acute provider perspective integrated with the current efforts to build HIEs.

1513 Race Street • Philadelphia, PA 19102-1177 • 215-587-3178 • Fax: 215-587-3390 • jcarroll@mageerehab.org • www.mageerehab.org

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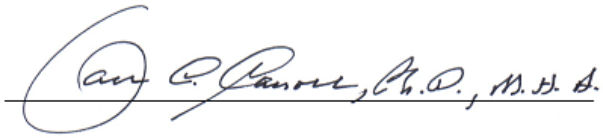
Overall, we thank ONC for highlighting the dramatic positive impact incentive payments have had on the adoption and use of EHR by hospitals and providers and for highlighting the current gaps that remain for national health IT use, including but not limited to post-acute care. We look forward to the final version of the "Federal Health IT Strategic Plan 2015-2020" and hope that the aforementioned challenges, goals, and solutions remain highlighted. If we may provide any further information or support to your office, please do not hesitate to contact Travis Gathright, Chief Information Officer at Magee Rehabilitation Hospital, at TGathright@mageerehab.org or 215-587-3463.

Respectfully submitted,



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