



NATIONAL ASSOCIATION OF  
CHAIN DRUG STORES

Via Electronic Submission at: [www.HealthIT.gov](http://www.HealthIT.gov)

April 3, 2015

Office of the National Coordinator  
Department of Health and Human Services  
Hubert H. Humphrey Bldg., Suite 729D  
200 Independence Ave., SW  
Washington, DC 20201

**Re: Connecting Health and Care for the Nation: A Shared Nationwide Interoperability Roadmap Draft Version 1.0**

Dear Sir or Madam:

The National Association of Chain Drug Stores (NACDS) appreciates the opportunity to provide input to Office of the National Coordinator (ONC) on the Shared Nationwide Interoperability Roadmap Draft Version 1.0. We thank ONC for soliciting input from a broad group of stakeholders and offer the following comments.

NACDS represents traditional drug stores and supermarkets and mass merchants with pharmacies. Chains operate more than 40,000 pharmacies, and NACDS' 115 chain member companies include regional chains, with a minimum of four stores, and national companies. Chains employ more than 3.2 million individuals, including 179,000 pharmacists. They fill over 2.9 billion prescriptions yearly, and help patients use medicines correctly and safely, while offering innovative services that improve patient health and healthcare affordability. NACDS members also include more than 850 supplier partners and over 60 international members representing 22 countries. For more information, visit [www.NACDS.org](http://www.NACDS.org).

NACDS has a notable record of supporting the widespread adoption of health information technology, such as e-prescribing, to enhance provider access to important health care information for improving patient health outcomes and producing a more efficient healthcare system. We appreciate ONC's recognition of pharmacy and pharmacists in the roadmap, particularly: the listing of pharmacists as health care providers and users of health information exchanges; the referencing of the NCPDP-HL7 Pharmacist/Pharmacy Provider Functional Profile Task Group; and acknowledging pharmacist services, such as medication therapy management (MTM).

As the face of neighborhood healthcare, community pharmacies and pharmacists provide access to prescription medications and over-the-counter products, as well as cost-effective health services such as immunizations and disease screenings. With the increase in the use of more integrated models of care, pharmacists will progressively play a vital role in advancing the health, safety and well-being of the American people. Through personal interactions with

patients, face-to-face consultations and convenient access to preventive care services, local pharmacists are helping to shape the healthcare delivery system of tomorrow—in partnership with doctors, nurses, and others.

NACDS urges ONC to continue to include the pharmacy community in the process of seeking to achieve the goal of a nationwide learning health system. We look forward to working with ONC and other industry stakeholders on this very important initiative.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric P. Juhl". The signature is fluid and cursive, with the first name "Eric" and last name "Juhl" clearly distinguishable.

Eric P. Juhl  
Director, Federal Public Policy