March 10, 2014

Karen DeSalvo, M.D.
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, 20201

Re: HIT Policy Committee Working Group Recommendations on Meaningful Use Stage 3

Dear Dr. DeSalvo:

On behalf of the Premier healthcare alliance serving more than 2,900 leading U.S. hospitals and healthcare systems and 100,000-plus other healthcare sites, we appreciate the opportunity to submit comments regarding the Stage 3 objectives for meaningful use of electronic health records (EHRs) currently being discussed by the Health Information Technology (HIT) Policy Committee. Premier is a performance improvement alliance using the power of collaboration and technology to lead the transformation to coordinated, high quality, cost-effective care. A 2006 Malcolm Baldrige National Quality Award recipient, Premier maintains the nation's most comprehensive repository of hospital clinical, financial and operational information and operates one of the leading healthcare purchasing networks.

Premier appreciates the HIT Policy Committee's continued efforts on defining the next stage of meaningful use and would strongly suggest that any new EHR meaningful use core measures be given due consideration based on experiences gained from stage 2 and their impact on patient quality of care, safety and patient engagement. To that end, we have attached section by section comments on the objectives currently being discussed before the Policy Committee.

Premier would also like to take this opportunity to underscore the importance of usability of EHRs in consideration of meaningful use objectives, current and future. As many of the healthcare providers have noted previously, despite billions of dollars in investments by the Federal government and providers alike, providers and patients continue to experience usability challenges of certified EHR systems due to the lack of interoperability among differing EHR systems and portability of EHR data necessary for decision support and patient safety critical in what the Institute of Medicine (IOM) calls "a learning health system." Simply put, usability depends on genuine interoperability

and portability of data within EHR product/systems that are able to interface with, be completely workable with other products or systems, present or future, without any restricted access or implementation. Usability depends on deploying innovative technologies that go beyond mere interfaces and data exchanges but open application programming interface (API) tools that could quickly, easily and affordably, integrate data with other EHRs. Thus, achieving usability and interoperability through portability of secure open data and technological innovations such as APIs should be one of the integrated goals within the meaningful use objectives developed by the Policy Committee in transforming and achieving the promise of EHRs and HIT in providing quality and value-based care while encouraging patient engagement.

Thank you again for this opportunity to provide input on the meaningful use objectives and if there are any questions about our comments or for more information, please contact Lauren Choi, Senior Director for Federal and International Affairs, at lauren_choi@premierinc.com, 202.879.8005.

Sincerely,

/s/

Blair Childs
Senior Vice President, Public Affairs
Premier healthcare alliance