

To: Michelle Consolazi

Date: 3/25/2014

Subject: Comment Meaningful Use Stage 3 Immunizations

As CEO of Scientific Technologies and 25 years of working public health informatics projects, I wanted to offer a few thoughts specific to Stage 3 and the current recommendations being offered for Query/Response; Clinical Decision Support and Transport for the EHR community.

The value or better stated the revenue and business case for MU to the clinical community is not found in electronic compliance which is provided in Stage 2. The clinical return on investment and benefit is only received by actively embracing and implementing Stage 3. Stage 3 is the empowerment stage.

At the point of care, immunization provider's who have Immunization Intelligence as a result of: (1) a bi-directional exchange with a state immunization system and (2) clinical decision support through a state trusted immunization forecaster, are empowered with information not guaranteed to reside within their EHRs. This means, by partnering with state public health for these supporting services, the provider augments the information in their EHR creating opportunity and the likelihood that the patient will receive (or be offered) a vaccination that they require.

The impact is; the provider generates additional revenue; the level of care and patient loyalty increases; and the potential for VPD decreases; all of which supports health cost care containment and prevention. Public health also "wins." They are in a position to provide value for immunization event compliance and reporting. By providing value public health increases their partnering opportunities which increase their ability to influence and improve vaccine uptake in target populations. Patients become the ultimate winner.

HITSC leadership that promotes immunization bi-directional record exchange with added decision support as envisioned in MU Stage 3 allows all stakeholders to benefit from the HIT and MU public health reporting initiatives. To stop or slow down this effort when momentum has been established and is building as a result of Stage 2 despite the various challenges, is somewhat like running the marathon but deciding there is no need to run the last mile.

We at STC can confirm through our work with EHRs, providers, and patients the high value that can be associated with MU 3 for immunizations. We have worked in Pharmacies and found that when a patient presents for a flu shot that over 75% of these individuals had a record in a state immunization system and when decision support was applied nearly 100% were past due or due for another immunization. When presented with this information a significant number of the consumers choose to get the appropriate vaccination. The impact: increased pharmacy revenue, increased customer loyalty, increased patient satisfaction and likely reduced VPD impact.

We have found working with EHRs and their physician provider community when we implemented bi-directional exchange and added decision support, the EHR vendors leveraged this as a value add for their systems. Physicians appreciated the fact they were better informed based upon a more complete patient record and their ability to add data to their Patient's EHR on-line medical record improved their ability to measure and monitor reporting for incentive payments.

One more note. We do not recommend any electronic exchange that is not in-line with the full potential value of supporting bi-direction and decision support. As a vendor working within the community implementation of Direct, although a solid exchange with value, is akin to installing rotary dial phones in your office.

I believe progressive EHRs will embrace MU State 3 and they will raise the bar for all others, promoting the right competition and a more rapid HIT improvement process. I believe providers who have the patient in front of them are appreciative of public health's role. It is just not mandatory reporting but they can now benefit from the health data assets within a state registry to support informed decisions.

And finally, I know it is the individual and their family that receive the biggest benefit and isn't that what Stage 3 is all about and the job we all signed up to tackle. Improved population health through better use of information technology and standards to achieve the higher goals and visions set forth in health care today.

Don't side step on MU Stage 3. Provide leadership, guidance and support and together we will make a difference.

/s/

Michael Popovich
CEO