



June 26, 2009

David Blumenthal, M.D., M.P.P.
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
Office of the National Coordinator for Health Information Technology
200 Independence Ave, SW
Suite 729D
Washington, DC 20201

Re: HIT Policy Committee Meaningful Use Comments

Dear Dr. Blumenthal:

The American Recovery and Reinvestment Act (ARRA) authorizes the Centers for Medicare & Medicaid Services (CMS) to provide financial incentives for eligible physicians who meaningfully use Health Information Technology (HIT). These incentive payments begin in 2011 for eligible Medicare physicians; physicians who have not demonstrated they are a meaningful user of HIT by 2015 will face reductions in their Medicare payments which start at 1 percent.

When implemented properly in a connected environment, widespread HIT adoption and use will transform the practice of medicine and provide a powerful tool by putting real-time, clinically relevant patient information and up-to-date clinical decision support tools in practitioners' hands at the point of care. ARRA enables the federal government, physicians, and others to work together to achieve the goal of widespread adoption and use of HIT. It is important to note that the vision of a nationwide interoperable HIT environment can not be fully realized without an appropriate focus on the IT software and vendor solution platforms that will deliver these technologically advanced applications to the market. As a result, we believe that any further detail on HIT incentive programs and "meaningful use" must also include GS1 Industry standards in connection with the medical supply chain.

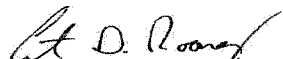
GS1 Global Supply Chain Standards in health care including its Global Trade Item Number (GTIN), Global Location Number (GLN) and the Global Data Synchronization Network (GDSN). These standards will help to reduce the overall cost of health care, significantly increase supply chain efficiency and improve patient safety.

The Health Industry Group Purchasing Association (HIGPA) appreciates the HIT Policy Committee's efforts to promptly issue a proposal for meaningful use objectives and measures that must be met by eligible providers to ensure receipt of the financial incentives specified in ARRA. We are concerned, however, that the current definition and understanding of the term "meaningful use" of electronic health records will overlook the important GS1 Global Supply Chain Standards where true health efficiencies will be realized.

Our Committee on Healthcare eStandards has held a long-term commitment to promoting and implementing these important standards. We appreciate the difficulty of addressing the strictly clinical related aspects of the electronic health record; however, maintain that an important part of the job that includes the medical supply chain may go unrecognized and possibly excluded from the development of this important term. For example, without including the health care supply chain in the definition of “meaningful use” efficient medical product recalls that can improve patient safety will be no closer to becoming a reality than they are today. Including GS1 Global Supply Chain Standards in the definition of “meaningful use” would make this important connection.

We appreciate the opportunity to comment on the Committee’s proposal and look forward to providing ongoing input to the Committee to ensure that the HIT meaningful use objectives and measures are reasonable and achievable for the entire health care delivery and support system. If you have questions about these comments, please contact Curtis Rooney, President, HIGPA, at 202.367.1215 or crooney@higpa.com.

Sincerely,



Curtis Rooney, President
Health Industry Group Purchasing Association
2025 M Street, N.W. Suite 800
Washington, D.C. 20036

cc: Vish Sankaran, Program Director, Federal Health Architecture, ONC

The Health Industry Group Purchasing Association (HIGPA) is a broad-based trade association that represents 16 group purchasing organizations, including for-profit and not-for-profit corporations, purchasing groups, associations, multi-hospital systems and healthcare provider alliances. HIGPA’s mission is to advocate on behalf of health care group purchasing associations, to provide educational opportunities designed to improve efficiencies in the purchase, sale and utilization of all goods and services within the health industry and to promote meaningful dialogue between GPOs. For more information, visit www.higpa.org.