October 9, 2018

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Health Resources and Services Administration
U.S. Department of Health and Human Services
5600 Fishers Lane
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Submitted electronically via: http://www.hrsa.gov/about/contact/bphc.aspx

RE: PAL 2018-03 Proposed Uniform Data System Changes for Calendar Year 2019

On the behalf of OCHIN, we appreciate the opportunity to comment on the implementation of the proposed changes contained within the Program Assistance Letter for Proposed Uniform Data System Changes for Calendar Year 2019.

OCHIN is a 501(c)(3) nonprofit community-based health information technology collaborative based in Portland, Oregon. OCHIN receives support from the U.S. Department of Health and Human Services through grants under the Health Resources and Services Administration (HRSA), and is a HRSA-designated Health Center-Controlled Network (HCCN). OCHIN’s mission is to pioneer the use of health information technology in caring for the medically underserved. As such, OCHIN serves community health centers (CHCs), including Federally Qualified Health Centers (FQHCs), rural and school-based health centers, safety-net providers and public health and corrections facilities across the nation. OCHIN’s comments are based on our experiences with the members we serve.

OCHIN appreciates the opportunity to comment, focusing on two overarching issues: the first, metric alignment, and the second, health information exchange under state policy and federal policy.

OCHIN supports:

- Further alignment with CMS clinical quality measures to reduce provider burden;
- Continued support to assist providers in the adoption of 2015 or newer CEHRT that can easily encourage data sharing and enabling of national frameworks such as Carequality;

OCHIN’s Comments on Proposed Changes for CY 2019 UDS Reporting

OCHIN strongly supports efforts to reduce provider burden to improve coordination and quality of care. A common metrics set must exist for all state and federal programs, and payers must accept those metrics, rather than adding additional administrative overhead by requesting different definitions for related metrics.
We also support reporting substance use disorder/mental health services performed by primary care providers, and telemedicine and virtual visits to support those suffering from substance use disorder as well as many others.

Specific Comments on Proposals

- We support the removal of Table 5A.
- OCHIN applauds HRSA’s addition of Closing the Referral Loop: Receipt of Specialist to Table 6B as an electronic specified clinical quality measure (eCQM). OCHIN strongly supports the need for a metric to encourage interoperability for healthcare providers across the nation. While this is an important measure to test, the ONC under Project 360X has not yet ratified standards for closed loop referrals at this time. As a result, electronic health record vendor developers will need more time to implement these standards once published. OCHIN encourages HRSA to delay this important metric for at least one year to give the EHR vendors time to implement.
- OCHIN supports the focus in Appendix D on interoperability and patient access information.
- We support focused questions on use of EHR technology for quality care delivery, and support HRSA’s alignment with CMS in these questions. We also support shifting focus from EHR adoption toward understand how EHRs are employed to support quality care delivery.
  - We recommend adding an option to the question: “Non-medical service providers” to capture organizations exchanging data with social service providers.

4. Which of the following key providers/health care settings does your center electronically exchange clinical information with? (Select all that apply)
  - Hospitals/Emergency Rooms
  - Specialty Clinicians
  - Other Primary Care Providers
  - None of the Above
  - Non-Medical Service Providers (please describe)
  - Other (please describe)

- We support the added focus on workforce advancement and believe that organizations will be able to answer these questions with little burden.

We thank you for your time and consideration of our comments on the Proposed Uniform Data System Changes for Calendar Year 2019. Please contact Jennifer Stoll at stollj@ochin.org should you have any questions.

Sincerely,

Jennifer Stoll
VP, Government Affairs and Public Relations