



Health Care Access for All

June 2, 2011

Health Information Technology Standards Committee Implementation Workgroup

RE: Comments on the electronic health record (EHR) Temporary Certification Program, Stage 1 Meaningful Use

HITSC Implementation WG,

On behalf of the California Primary Care Association (CPCA) and the 870 nonprofit community clinics and health centers (CCHCs) in California, I thank you for the opportunity to comment on the EHR Temporary Certification Program. CCHCs in California will be working with their over 2,500 eligible professionals to participate in the Medicaid Meaningful Use Incentives. California is expected to go live with the program sometime this summer. As you may know, clinics and health centers offer comprehensive health care services to our country's most low income and underserved populations. While some just provide primary medical care, many provide dental and behavioral health services as well. As such, CCHCS use not only EHRs, but also electronic dental records.

Since the release of the Incentive Program and all the related rules, CPCA has been particularly concerned with the issues related to dentists. They are an eligible professional category, and yet there are no oral health measures in meaningful use or standards for certified electronic dental records, and so dentists must use electronic health records to capture clinical measures. The EHRs were not created for a dental practice and it is not meaningful for them to capture clinical measures or report no clinical measures because it is outside of their scope.

CPCA strongly encourages that the ONC develop a certification standard specifically for electronic dental records (EDRs) that will make the program more accessible to oral health professionals. Without such a standard, the ONC is unnecessarily forcing dentists that want to participate in meaningful use to purchase systems that are not relevant to their scope of practice. Certified EDRs can be used to manage one of the targeted meaningful use chronic conditions- diabetes. Periodontal disease is the most common problem for people with diabetes. Providing dentists with certified EDRs along with appropriate oral health measures to capture would facilitate the federal goal of reforming the health care delivery system to be more responsive, efficient, and cost-effective.

CPCA understands that the American Dental Association (ADA) is working on standards by which EDRs could be certified. We encourage the ONC and all respective Workgroups to

support the ADA's efforts. We do not want to leave oral health behind as more and more studies are linking oral health to overall improved health status.

If you have any questions about these recommendations, please do not hesitate to contact our Assistant Director of Policy, Andie Patterson, at (916) 440-8170 or apatterson@cpca.org. Thank you for your attention and consideration.

Sincerely,

Andie Patterson, MPP
Assistant Director of Policy
California Primary Care Association