



**CPCA Strategy for Commenting on
CMS Meaningful Use Proposed Rule
&
ONC Standards, Implementation Specifications, and Certification Criteria
Interim Final Rule**

Strategy

CMS Rule: The CMS Meaningful Use Proposed Rule has two main components: measures and administration. CPCA's Government Affairs Department staff, Andie Martinez, is leading the coordination of submitting comments. She will be working with the Clinical Department staff, Senely Navarrete and Marjorie Katz, to coordinate the EHR meaningful use sub-workgroups created in November 2009 to analyze and coordinate comments on the clinical measure portion of the rule. For the Administrative portion of the rule, Director of Government Affairs, Elia Gallardo, and Associate Director of Federal Affairs, Stephanie Berry, will assist in reviewing and commenting. The EHR meaningful use workgroup will also review and weigh in on the administrative portion of the rule.

CPCA will work with NACHC to coordinate and align comments. Additionally, Andie will work with the California Safety Net Coalition (CSNC) to submit comments with the CSNC and coordinate the CSNC organizations' national counterparts to comment as well.

ONC Rule: CPCA's Government Affairs Department staff, Andie Martinez, is leading the coordination of submitting comments. The ONC Standards Proposed Rule will be reviewed by members of the CIO taskforce.

CPCA will work with NACHC to coordinate and align comments. Additionally, Andie will work with the California Safety Net Coalition (CSNC) to submit comments with the CSNC if it is deemed appropriate.

Timeline

December 30 CMS and ONC release proposed rules

January 13 Official publication of CMS and ONC rule; 60 day window for submitting comments begins

March 14 Comments due to CMS and the ONC