



# AAFP

# Health Care Research, Quality and Health Information Technology

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As of December 22, 2011

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In 2011, the Academy:

- Commented with other national and state physician organizations in a joint [letter](#) sent August 8 to CMS that several critical issues must be resolved regarding the proposed Availability of Medicare Data for Performance Measurement regulation.
- Participated with 19 other national physician organizations in a coalition [letter](#) sent August 1 to HHS's Office of Civil Rights (OCR) in response to the proposed rule on HIPAA privacy regulations. If the regulation is finalized in its proposed form, electronic health records must be capable of producing a report, upon patient request, that contains information on when a patient's personal health information was accessed over a three year period. The comment letter urged OCR to withdraw the access report requirement and to significantly modify the proposed accounting of disclosures report.
- Responded to CMS's [proposed](#) Changes to the Electronic Prescribing Incentive Program in a July 18 comment [letter](#). The AAFP expressed appreciation that CMS recognized the need to permit additional significant hardship exemption categories in 2011 to help more physicians avoid the 2012 electronic prescribing penalty. In addition, the AAFP supported the provision that would offer an extended timeframe for physicians to request a hardship exemption. The AAFP concurred with a proposal to better align electronic prescribing requirements with the Medicare and Medicaid Electronic Health Record Incentive programs as well as with Medicare Part D standards. In addition to the July 18 comment letter, the AAFP joined other national and state physician organizations in a July 25 [letter](#) responding to the same regulation.
- Nominated Dr. Laura Pickler on June 28 to serve on the Agency for Healthcare Research and Quality (AHRQ) Children's Health Insurance Program Reauthorization Act (CHIPRA) Pediatric Quality Measures Program expert panel.
- Commented in a [letter](#) sent June 23 on the Institute of Medicine's (IOM) proposed continuous assessment and improvement study. The AAFP commended the IOM's proposal as representing the noble cause of improving the quality of healthcare, then offered detailed recommendations on certain aspects, such as the measurement, training, potential barriers, and timeline, of their plan.
- Responded to a proposed Influenza Vaccination Standard for Certain Participating Providers and Suppliers regulation in a June 20 [letter](#) to CMS. This proposed regulation requires certain Medicare and Medicaid providers and suppliers to offer all patients an annual influenza vaccination, unless it is medically contraindicated or the patient or patient's surrogate declined. The AAFP concurred with the overall intent of the regulation, but urged CMS to include in the final rule a requirement that immunizations made outside of the primary care physicians' office should be, to the greatest extent possible, electronically communicated back to that physician.
- In partnership with other national and local public health organizations, sent a comment [letter](#) dated June 16 commending the release of the National Prevention Strategy.

- In a June 6 [letter](#) to the HHS's National Vaccine Program Office, commented on the Vaccine Safety Working Group's draft white paper on the federal vaccine safety system.
- Commented in a March 30 [letter](#) to CMS on a new requirement that certain Medicare providers give beneficiaries with information about their right to file a written complaint with the state Quality Improvement Organizations and right to access state survey agencies.
- In a February 23 [letter](#) to the AHRQ, provided comments to specific quality measures proposed for use in the Initial Core Set of Health Quality Measures for Medicaid- Eligible Adults regulation.
- Sent a [letter](#) dated February 17 to the IOM's Committee on Patient Safety and Health Information Technology in response to their consensus study regarding experiences with health information technology.
- Sent CMS a [letter](#) on January 19 offering suggestions to evolve the problematic Physician Quality Reporting System (PQRS). The AAFP urged CMS to improve access to the PQRS feedback reports, to phase out the claims-based reporting option, to offer EHR-based reporting options for both full and half year reporting periods and to increase alignment between the PQRS and the Electronic Health Record Incentive Program.
- Commented in a January 18 [letter](#) to the Office of the National Coordinator for Health Information Technology (ONCHIT) on the report by the President's Council of Advisors on Science and Technology entitled Realizing the Full Potential of Health Information Technology to Improve Healthcare for Americans: the Path Forward.
- Sent AHRQ a [letter](#) on January 12 regarding the agency's priority setting for the Children's Health Insurance Program Reauthorization Act (CHIPRA) Pediatric Quality Measures Program (PQMP). In the letter, AAFP urged AHRQ to consider the core set of pediatric quality measures as an interim set along the way to a more focused set of patient-oriented outcome measures.