



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

March 19, 2015

Jon White, M.D.
Acting Deputy National Coordinator/Acting Chief Medical Officer
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
200 Independence Avenue, SW (Suite 729-D)
Washington, D.C. 20201

RE: Interoperability Standards and Appropriate Use Criteria

Dear Dr. White:

On behalf of the American Academy of Family Physicians (AAFP), which represents 115,900 family physicians and medical students across the country, I write to express our deep concerns with the lack of interoperability in health care. Compounding this concern is the disproportional burden primary care physicians will face in 2017 when trying to comply with Section 218 of the *Protecting Access to Medicare Act*, which requires physicians ordering certain imaging services (magnetic resonance, computed tomography, nuclear medicine and positron emission tomography imaging services) for Medicare beneficiaries to consult appropriate use criteria applicable to the imaging modality.

Many primary care physicians already find their current electronic health record (EHRs) systems to be cumbersome and impeding patient care. The AAFP is concerned that EHRs will not be able to address the workflow needs incumbent upon the ordering physician when consulting and documenting that appropriate use criteria were accessed. We have seen evidence of this obstacle in implementations of Meaningful Use requirements.

We therefore ask the Office of the National Coordinator (ONC) to consider carefully how “appropriate use criteria” can be workable in a practice’s EHR system. Conceptually we support voluntary adherence to appropriate-use criteria as a mechanism to promote evidence based medicine developed by national professional medical specialty societies or provider-led entities. We believe ONC should facilitate compliance by establishing interoperability standards and requiring all EHRs to adhere to the appropriate-use criteria specified by CMS. In summary, and very candidly, primary care physicians cannot comply unless these standards exist and have been implemented.

We appreciate the opportunity to provide these comments and your consideration of our concerns. Please contact Steven E. Waldren, MD, MS, Director of the Alliance for eHealth Innovation at 800-274-2237, extension 4100 or swaldren@aafp.org.

Sincerely,

Reid B. Blackwelder, MD, FAFAP
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