



June 3, 2016

Karen DeSalvo, MD, MPH, MSc
Acting Assistant Secretary for Health
U.S. Department of Health and Human Services
Office of the National Coordinator for Health Information Technology
Attention, RFI Regarding Assessing Interoperability for MACRA
330 C Street SW., Room 7025A
Washington, DC 20201

Dear Dr. DeSalvo,

On behalf of the American Academy of Family Physicians (AAFP), which represents 124,900 family physicians and medical students across the country, I write in response to the [request for information](#) regarding assessing interoperability for the *Medicare Access and CHIP Reauthorization Act of 2015* (MACRA) as published by the Office of the National Coordinator for Health Information Technology (ONC) in the April 8, 2016 *Federal Register*.

The AAFP appreciates the opportunity to work with ONC toward achieving these goals and have the following responses to ONC's questions in this regulation.

Scope of Measurement: Defining Interoperability and Population

1. Should the focus of measurement be limited to "meaningful EHR users," as defined in this section (e.g., eligible professionals, eligible hospitals, and CAHs that attest to meaningful use of certified EHR technology under CMS' Medicare and Medicaid EHR Incentive Programs), and their exchange partners? Alternatively, should the populations and measures be consistent with how ONC plans to measure interoperability for the assessing progress related to the Interoperability Roadmap? For example, consumers, behavioral health, and long-term care providers are included in the Interoperability Roadmap's plans to measure progress; however, these priority populations for measurement are not specified by section 106(b)(1)(B)(i) of the MACRA.

The AAFP believes that to achieve "widespread interoperability" a consistent and uniform measurement process is needed. Such a process would enable measurement of interoperability broadly across the entire health care ecosystem. For the purpose of continuity of care, care coordination, and the standard of care for any given care encounter, physicians and healthcare providers who are meaningful EHR attestors must exchange information with non-meaningful users who have not yet attested to Meaningful Use, MACRA, the Merit-based

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