June 10, 2013

HIT Policy Committee, Meaningful Use Workgroup
Office of the National Coordinator for Health Information Technology
Patriots Plaza III
355 E Street, SW
Washington, DC 20201

RE: A new meaningful use objective to capture identifiers for implanted devices.

Dear Workgroup Members,

We write to strongly encourage the Meaningful Use Workgroup to recommend new electronic health record (EHR) certification criteria and a Stage 3 meaningful use objective to incorporate unique device identifiers (UDIs) of newly implanted devices into patient's medical records.

In 2010, five healthcare systems—Geisinger Health System, Intermountain Healthcare, Kaiser Permanente, Mayo Clinic and Mercy—formed an action-oriented collaboration called the Healthcare Transformation Group (HTG) to share best practices and drive needed positive change across the healthcare supply chain. Through this collaboration, HTG established a Research and Development (R&D) Team, comprised of physicians and clinical researchers from the five health systems, to jointly accelerate the implementation of the UDI system.

The HTG R&D Team will be working to establish a standard language and network of data sets within their healthcare systems. The project, which is an expansion of a U.S. Food and Drug Administration UDI demonstration project currently underway, will eventually provide a pathway to implement UDI into each HTG healthcare system's clinical processes, tracking devices from manufacturer to patient.

The UDI system will serve as the foundation for future improvements in monitoring medical device safety and quality. UDI incorporation in electronic health information, including EHRs, will enable the tracking of medical devices through their distribution and use; create data sets for research and safety surveillance; support comparative effectiveness research; facilitate better management of product recalls; and help generate health system savings.

To realize these patient care benefits across the country, we support the recent letter sent to the Meaningful Use Workgroup from The Pew Charitable Trusts on the establishment of new certification criteria to enable UDI capture in EHRs and a new core meaningful use objective for eligible hospitals on the inclusion of implanted device identifiers in EHRs. We also believe it is a reasonable expectation for new hospital discharge summaries to include the UDI so that patients and their other providers can readily have and use the critically important information accessible through the UDI.

A meaningful use objective will help us and other health systems to fulfill the critical mission of improving patient lives and health outcomes. A new objective to document the identifiers of implanted devices will ensure that clinicians in our health systems and other institutions leverage EHRs to generate a critical mass of data on device safety and quality, thus helping to unlock the full benefits of a UDI.

If we can provide any assistance or should you have any questions, please contact Dr. Joe Drozda Jr., chair of the HTG R&D Team, via email at Joseph.Drozda@Mercy.Net.

Sincerely,

Laurel L. Junk
Chair, Healthcare Transformation Group
Kaiser Permanente

The HTG R&D Team Members:

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