Department of Health & Human Services



Centers for Medicare & Medicaid Services

Office of Research, Development and Information

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**MEDICARE DEMONSTRATIONS PROGRAM GROUP**

**TO:** OMB

**FROM:** Debbie Van Hoven

Medicare Demonstrations Program Group

**DATE:** February 5, 2008

**SUBJECT:** Response to CMS-10165 Comments

One comment was received in response to the Paperwork Reduction Act (PRA) package CMS-10165. This comment, and CMS’ response, is provided below.

**1. Eligibility Requirements**

The commenter believes that the EHR Demonstration should not focus exclusively on primary care and physician services. The integration of health information technologies into the practices of non-physician practitioners is equally important in improving the quality of care rendered to Medicare beneficiaries. It is important that the adoption of health information technology is approached comprehensively and encompass a wide range of health care providers. The commenter strongly urges CMS to create a demonstration that is inclusive of all health care providers that deliver the full complement of services to Medicare beneficiaries.

**CMS RESPONSE:**

The basic provider eligibility requirements for the EHR Demonstration have already been determined and are reflective of the questions to be posed as part of the application form.  We recognize that this project is limited in scope and would point out that not all types of physicians/physician practices are eligible, as this initiative is focused on small-medium sized primary care practices only.  We do not intend to open the demonstration beyond providers affiliated with eligible practices to be identified for participation in this demonstration initiative.  Therefore, the application form will not be revised in response to the comment.  We would note, however, that the Physician Quality Reporting Initiative is open to all professionals who provide services that are paid under the physician fee schedule, which includes not only physicians but other practitioners and therapists.