## American Academy of Pediatrics



DEDICATED TO THE HEALTH OF ALL CHILDREN™

September 29, 2009

Agency for Healthcare Research and Quality ATTN: OMB Desk Officer 540 Gaither Rd Rockville, MD 20850 OIRA\_submission@omb.eop.gov

To Whom It May Concern:

Thank you for the opportunity to comment on the Health IT Community Tracking Study 2009. The American Academy of Pediatrics (AAP) is an organization of 60,000 pediatricians, pediatric medical subspecialists, and pediatric surgical specialists committed to the attainment of optimal physical, mental, and social health and well-being for all infants, children, adolescents, and young adults.

The AAP encourages the use of electronic prescribing (e-prescribing) by its members. In 2007, we published a policy statement an accompanying technical report titled, "Electronic Prescribing Systems in Pediatrics: The Rationale and Functionality Requirements." Both documents are attached for your consideration. The AAP recognizes the potential for e-prescribing to reduce medical errors and enhance patient care. However, many e-prescribing systems today do not include basic functionality required when prescribing medications for children, eg, the ability to calculate medication dosage based on age, weight, or body surface area. It is extremely important, when integrating new technology into the patient care environment, that consideration is given to how the new processes will impact patient outcomes.

In addition, pediatricians frequently report that their local pharmacies do not recognize when an electronic prescription has been transmitted. Families may arrive at the pharmacy only to be told that their doctor never sent the prescription. This situation can lead to inefficiency and negative publicity for the pediatrician's practice, and may cause the pediatrician to revert to paper prescriptions.

We recommend that researchers conducting the pilot test include pediatric practices among the study cohort. If this is not possible, we request that AHRQ consider a separate study of ambulatory pediatric primary care, medical subspecialty, and surgical specialty practices, since pediatric practices may have specific needs and concerns related to e-prescribing. In addition, we recommend that the study include both solo/small group practices and large group practices in order to effectively compare implementation strategies in these very different environments.

The AAP applauds your efforts to understand the pros and cons of e-prescribing for healthcare providers in all care settings. We stand ready to provide assistance should the Agency desire additional input or participation. If you have any questions, please contact Jennifer Mansour (<u>jmansour@aap.org</u>) or Beki Marshall (<u>bmarshall@aap.org</u>) in our Division of Pediatric Practice at 800/433-9016, ext 4089.

Sincerely,

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David T. Tayloe, Jr, MD, FAAP President

DTT/bm Enclosures

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