

[REDACTED]

From: [REDACTED]
Sent: Wednesday, May 22, 2013 10:32 AM
To: CommentPeriod, HealthIT (Thune)
Subject: HITECH ACT / EHR Incentive

Hello,

I am writing today representing not only myself as a health care consumer, but also the 26 Radiologists of University Radiology of whom I am employed. I urge you and all of Congress to take appropriate actions to address the many elements of this HITECH/EHR Incentive program that are broken, costly, creating inefficiencies, and ultimately not accomplishing what it was designed for. Please act!

There are many issues with this program. First, let me address the general issues. The program says its goal is to increase interoperability, reduce costs, and improve care (among other things). Simply put, it does none of these. Practices are implementing EHR in their offices only to capture Federal Incentive dollars (that the government can't afford to pay) and are not using it to improve care, reduce cost or increase interoperability. Simply put, these things are not happening. For these reasons I would encourage Congress to suspend or significantly curtail these incentive payments.

Secondly, as a radiologist, the definition of Eligible Provider is flawed. The definition of EP not only places radiologists in a place of incurring penalties if they are not compliant by a certain time, it also causes the Federal Government to fund not only Hospitals for their participation in the EHR program, but also potentially radiologists who in many cases are using the same systems and data has the hospitals....ie, a "double payment" if you will. For this reason I ask Congress to revisit the definition of Eligible Provider and to permanently exempt radiologists from penalties for non-participation in this flawed program.

Sincerely,

[REDACTED]