July 18, 2016

The Alliance of Specialty Medicine (the “Alliance”) represents more than 100,000 specialty physicians from 13 specialty and subspecialty societies. The Alliance is deeply committed to improving access to specialty medical care through the advancement of sound health policy. For this reason, the undersigned organizations are pleased to lend their support to the “EHR Regulatory Relief Act.”

Since the fall of 2015, the Centers for Medicare and Medicaid Services (CMS) has promised to change the Meaningful Use (MU) program in response to strong complaints and concerns from the provider community. In the recent rule implementing the Medicare and CHIP Reauthorization Act (MACRA), CMS did make some changes to what was the MU program but, unfortunately, those changes provide little substantive relief for physicians.

Most importantly, the agency will maintain its all-or-nothing approach to EHR implementation measurement, which has been one of the most problematic aspects of MU implementation to date. For these reasons, we strongly support the EHR Regulatory Relief Act’s proposal to move away from the 100%-or-nothing approach to MU. In addition, we appreciate the extension of the hardship exemption and codification of the 90-day reporting period.

The EHR Regulatory Relief Act contains changes that are necessary for the successful deployment of EHRs, which is a goal we all share. We strongly support the legislation...
and thank you for listening and responding to the concerns of specialty physicians in your states.

Sincerely,

American Association of Neurological Surgeons
American Academy of Facial Plastic and Reconstructive Surgery
American College of Mohs Surgery
American Gastroenterological Association
American Society of Cataract and Refractive Surgery
American Society for Dermatologic Surgery Association
American Society of Plastic Surgeons
American Urological Association
Coalition of State Rheumatology Organizations
Congress of Neurological Surgeons
North American Spine Society
Society for Cardiovascular Angiography and Interventions