



November 2, 2007

Secretary Michael Leavitt
Department of Health and Human Services
200 Independence Avenue, SW
Washington, D.C. 20201

Dear Mr. Secretary:

On behalf of the American Medical Group Association (AMGA), I am writing to support adoption of the electronic health record and to applaud the recently announced Medicare Electronic Health Records demonstration project which fosters that objective.

AMGA is an association that represents medical groups, including some of the nation's largest, most prestigious integrated health care delivery systems. AMGA members' includes over 300 medical groups, 85,000 physicians who deliver health care to more than 50 million patients in 40 states, including 15 million capitated lives.

According to an annual survey of AMGA's members, 84% have implemented some form of health information technology and many use fully functional electronic health records. As integrated systems of care, AMGA members are already implementing sophisticated information technologies that serve as the underpinning to providing evidence-based, coordinated care to patients with chronic conditions, attaining improved clinical outcomes, reducing medical errors, and achieving efficiencies.

AMGA supports creating mechanisms to provide compensation to those who acquire and use health information technology for the many benefits it brings to patient care. However, the demonstration project focuses on offering incentives to small and medium sized groups to stimulate their participation in that which AMGA members have taken the lead, acquisition and use of electronic health records.

We suggest two things for your consideration regarding the demonstration. First, a five year demonstration project is unnecessary. There is a body of evidence and expert opinion support for the many benefits that are gained from application of advanced electronic infrastructure in health care delivery. This term puts the "testing" phase too far ahead of the more important adoption and implementation phases of national health care policy. We propose that a three year period would suffice for this project.

Secondly, recognizing and rewarding those who have already made investments in doing the right thing, using electronic health records, should be an important and equitable facet of national health care policy.

Therefore we urge you to reconsider the framework of the EHR project, shorten its duration, and offer acknowledgement of leadership with attendant financial reward to those who are at the forefront of implementation.

We would be pleased to work with you to achieve national health policy that spurs promulgation and use of electronic health records. Contact Chet Speed, Vice President of Public Policy, of my staff at (703) 838-0033 extension 364 or by email at cspeed@amga.org, if you have questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald W. Fisher".

Donald W. Fisher, Ph.D.
CEO and President