CENTRA

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April 30, 2009

Mr. Harry L. Reynolds, Jr.
Chairman
National Committee on Vital and Health Statistics
U.S. Department of Health and Human Services
200 Independence Avenue, NW
Washington, DC 20201

Dear Chairman Reynolds:

On behalf of Centra, we are pleased to submit Centra's comments on "Meaningful Use". Centra is an integrated healthcare delivery system in central Virginia consisting of three hospitals, comprehensive rehabilitation facilities, long term care, mental health facilities, 544 doctors and 5,500 employees. Centra's Medicare population at 52% is significantly above the national average for hospitals, and has forced focus on improving efficiencies in order to continue the high level of quality our community demands. Centra's use of health information technology has helped physicians for almost 20 years through access to Centra data systems for patient test results, medication lists, allergies, and past medical conditions.

Centra's use of health information technology has been recognized with recent national distinctions including:

- Forbes Magazine ranking as one of the safest hospitals in America
- Premier/CareScience ranking as top 1% nationally in clinical quality
- One of the 100 Most Wired Hospitals in America by the American Hospital Association publication
- Central Virginia was rated by the Dartmouth Health Atlas among the lower cost-per-capita regions in America.

Centra agrees with testimony during the NCVHS Executive Subcommittee Hearing defining "Meaningful Use" as an EHR journey that should include a tiered approach to functionality, secure exchange of health information and the reporting of quality indicators. This would allow healthcare systems to leverage current technology, continue functionality expansion and comply with standards and certification measures as they are adopted. Vendors must be given time to upgrade applications to meet these new standards and hospitals will need time to implement. Centra also agrees that Health Information Exchanges and Quality Data Warehouses must be based on community need and built to comply with the National Health Information Network as it is defined.

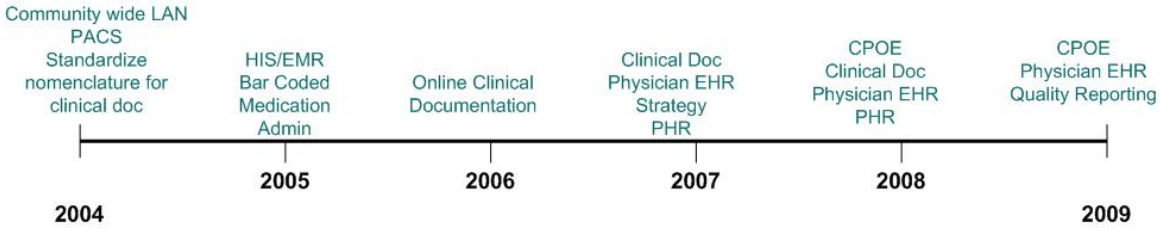
Centra has spent the past several years and $34 million implementing advanced health information technology and believes "meaningful use" will take years, not months to put into practice. As referenced below, a key list of capability/functionality required to enable a safe, patient-centric, high quality health care system that optimizes patient outcomes in our community include:

- Currently implemented within our hospitals
    - Electronic master person index consisting of 89% of population
    - 100% Physician Electronic Signature
    - 95% Bedside Bar Coding of medication
    - 92% of Nursing Documentation Electronic
    - 30% of all orders entered on-line by a physician (CPOE)
    - 420 evidence based CPOE order sets and clinical protocols
    - Fully implemented Radiology and Cardiology PACs, Lab, Radiology and pharmacy systems
    - HIPAA compliant web based portal to view Centra's EHR

- Currently in progress - affiliated and un-affiliated physician practices
    - Electronic Health Records(EHR)
        - ePrescribing , Charting, Physician documentation, Orders/Results
    - Personal Health Records
    - Electronic exchange of lab results, radiology and transcribed reports
    - HIPAA compliant web based portal to view Centra's EHR
    - Quality Reporting of Cardiology measures

As a nationally recognized leader of health information technology, Centra has learned that implementing electronic medical records offers great promise – but it is not a magic bullet. Healthcare IT should not be characterized as a quick fix because it takes time and careful planning and comes at an early cost of lost productivity. "Meaningful Use" is a journey that will need to be carefully planned with achievable interim steps to reach the health IT goals of the ARRA. We want to recognize and leverage the work of vendors and health providers in developing the interim steps.

Centra's implementation time line




Centra believes this deployment schedule is consistent with that of a community based non-profit health system

In conclusion, I'd like to thank NCVHS for providing me the opportunity to share my insights and expertise with the committee. There is a long road ahead but it is filled with the promise of better health for all Americans in their own communities if we work together and get it right. I look forward to working with you and other stakeholders in achieving the goals of the ARRA.

Sincerely,

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