PREMIER TRANSFORMING HEALTHCARE TOGETHER™

April 9, 2014

Ms. Margaret Weiker
Chair, X12N
The Accredited Standards Committee X12
8300 Greensboro Drive
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McLean, VA 22102
margaret@theweikergroup.com

RE: Transmission of the Unique Device Identifier in Claim

Dear Ms. Weiker:

We are writing to express our support for updated standards to enable the capture and transmission of the new unique device identifier (UDI) system in the claims transaction.

Premier, Inc. (NASDAQ:PINC) is a leading healthcare improvement company, uniting an alliance of more than 2,900 U.S. hospitals and nearly 100,000 other providers to transform healthcare. With integrated data and analytics, collaboratives, supply chain solutions, and advisory and other services, Premier enables better care and outcomes at a lower cost. Premier, a Malcolm Baldrige National Quality Award recipient, plays a critical role in the rapidly evolving healthcare industry, collaborating with members to co-develop long-term innovations that reinvent and improve the way care is delivered to patients nationwide.

As you are aware, the Food and Drug Administration's (FDA) UDI system will provide each medical device with a code corresponding to its make, model and other clinically relevant information, such as expiration date. This UDI system will significantly improve public health and patient care by enhancing recall resolution and enabling more sophisticated postmarket surveillance. However, the full public health and patient safety benefits of this new device identification system are only possible through UDI capture and transmission throughout healthcare delivery—including in electronic health records, adverse event reports, supply chain systems and claims.

Unlike many other information sources, claims offer large, standardized data sets for analysis. They also support longitudinal analyses on patient outcomes across multiple providers. For example, often,

patients seek follow-up care for implanted devices from providers that did not implant the device. Claims data would capture both the procedure and the patient outcome.

UDI capture in claims is also the most efficient and effective method that will add to the FDA's Sentinel Initiative—post market surveillance system that relies predominantly on claims data—to assess device safety. The FDA has only been able to utilize Sentinel to enhance drug safety, and Congress ordered the FDA in 2012 to use this system for devices.

We urge ASC X12 to support the development of a new field in claims to allow hospitals to transmit the UDIs to health plans, especially for those high-risk implants, which will enable transparency in data necessary to greatly improve patient care and outcomes.

Sincerely,

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