

To: Members of Bipartisan Congressional Task Force on Economic Growth in Puerto Rico
("Task Force")

From: Puerto Rico Health Information Network ("PRHIN")
Antonio Sisco-Oquendo - State HIT Coordinator

Date: September 2th, 2016

Re: Recommendations on Health IT as Enabler for equitable access to Federal Health Care
Programs

As part of the Commonwealth of Puerto Rico's Public Sector, the Puerto Rico Health Information Network ("PRHIN") submits recommendations on Section 409 of the Puerto Rico Oversight, Management, and Economic Stability Act ("PROMESA"), in particular to help the "Task Force" report no later than December 31, 2016 impediments in current Federal Law and programs to economic growth in Puerto Rico including equitable access to Federal health care programs.

In accordance to Puerto Rico Act 40 of 2012 and the HITECH Act. Puerto Rico's Act 40 created the PRHIN as a public corporation and created the position of "State Health Information Technology Coordinator".

In 2013, a State HIT Coordinator was appointed by the Executive to direct the PRHIN for a term of seven (7) years, expiring on 2020.

In February, 2009, President Barack Obama signed the American Recovery and Reinvestment Act (hereinafter, the "ARRA"). Title XIII of this Act, entitled "Health Information Technology for Economic and Clinical Health" (hereinafter, "HITECH Act"), had a significant impact on the healthcare landscape as to the rendering of services, health information exchange, and the legal framework that protects such information. The HITECH Act provides billions of dollars in incentives for the states and territories of the American nation to adopt and implement the technological infrastructure with the capacity to sustain Electronic Health Records (EHR) applications.

The financial incentives under the HITECH Act are granted through the Medicare and Medicaid Federal programs and shall be obtained by those eligible healthcare professionals who adopt EHRs and are able to accomplish their "Meaningful Use." Eligible healthcare professionals could receive financial incentives of up to \$44,000 under the Medicare program and \$63,750 under Medicaid for the adoption and meaningful use of EHRs in their practice.

The total population insured under Medicaid in Puerto Rico is of 1,674,292 (1)

(1) Commonwealth of Puerto Rico, Puerto Rico Medicaid Quality Strategy 2013-2016

PRHIN is becoming the Data collection center for clinical and financial information to have a better understanding of health related costs and the health conditions of Puerto Rico's population, and facilitates fast access to patient information from different health care centers, accelerates the flow of patients' information from ER services, minimizes the amount of unnecessary services and duplicate studies of laboratories, radiology services and pharmacy prescriptions; reduces the high processing costs of information, increases the capacity to use the health information exchange interoperability in order to phase out from independent record-keeping into an interconnected ecosystem by collecting and centralizing data from providers, MCOs and key public health entities into a centralized data repository that drastically reduces the cost of health care administration.

A key benefit of Puerto Rico Health Information Network's (PRHIN) approach is that it cuts patient **Care Coordination** time, thus facilitating the administration of medical services for eligible and non-eligible populations.

PRHIN's approach has the capacity to generate reports to tackle **financial fraud and abuse** arising from eligibility, duplicate transactions and unauthorized procedures, among others. Also, data aggregation leads to better **fiscal accountability of Medicaid funds**, as a result of early detection of potential fraud cases, and the accountability of Duplicity, Patients' utilization by CPT, ICD-10, CPT Code Cross Matching with ICD-10, Influenza Analysis, Hospital, Laboratory, and Respiratory Diseases, Asthma, Diabetes, Heart Disease.

RECOMMENDATIONS:

- **Medicaid and Medicare state-like Funding treatment:**
In order to access a state-like funding treatment, Puerto Rico must continue to seek improvements on processes, policies and tools to link and synchronize Medicaid members, providers, and organizations. A unified view of Medicaid provider and member data across the Medicaid and Health Information Exchange (HIE) is necessary to improve the precision and quality of data necessary to enhance care coordination and data quality of reporting for Medicaid members.
- **Enforce Meaningful Use (“MU”) Adoption:** throughout the CMS Meaningful Use program, Puerto Rico's health providers maybe awarded with up to \$ 230 million dollars, implementing Electronic Health Record certified by the Puerto Rico Health Information Network. These efforts will translate into economic growth immediately, since the funding will be invested mostly in local EHR vendors and indirectly with the state tax collection related to the sales tax originated from HER vendor sales.

- **Expand Meaningful Use:** Meaningful Use objectives established in 42 CFR Parts 412 and 495 finalized on October 16, 2015. They focus on supporting advanced clinical processes, promoting interoperability and health information exchange, continuing progress in electronic public health reporting, and expanding the scope and methods for provider and patient engagement. By extending the program until December 2020, Puerto Rico maybe able to close the adoption of the HIE strategy and will continue to enforce the on boarding of health care providers to leverage the Coordination of Benefits, and cut down costs associated with duplicated procedures.
- **Enforce the adoption of Health IT:** Puerto Rico's implementation strategy will leverage the EHR Incentive Program provider list as the initial outreach target for the HIE Provider Onboarding Program. Puerto Rico will continue to identify complex organizations, provider types, and client populations that may benefit from HIE onboarding assistance and core, MU, and value-added HIE services. Puerto Rico expects the total number of physicians that are ready to connect to the statewide HIE to continue growing steadily. The EHR adoption rate has increased since the EHR Incentive Program was implemented; however, exact growth rate is not known at this time. Puerto Rico plans to complete an updated Environmental Scan to determine EHR usage and to identify existing gaps.
- **Enforce the implementation of the Specialized Disease Registry and Bio Surveillance Program:** The World Health Organization and partners have set out their strategic response to Zika, which places a greater focus on preventing and managing medical complications caused by Zika virus infection. To assist with this goal, Puerto Rico must be able to accurately identify all cases of Zika as soon as they are diagnosed, and prepared its HEALTH IT infrastructure for future Specialized Disease in order to collect data in a timely fashion for enhance citizen's population and cut down costs.

The PRHIN faces a number of general challenges: 1) a weak local economy coupled with a federal budget cut in February 2014; 2) previous history of lack of dissemination, responsiveness and collaboration from stakeholders in the health care industry; 3) demographic issues such as a rapidly aging population and a growing lower-income population; and 4) an increase in the migration of health care professionals to the continental U.S. Specifically, the following specific challenges have been identified:

1. Lack of funding for operations, platform-development and maintenance,
2. Need of sufficient design and implementation of a Query-Based Exchange,
3. Engaging key stakeholders,
4. Lack of health information exchange activity and subprime dissemination of services provided by PRHIN,

5. Lack of integration of health information in interoperable health IT to improve care coordination and the quality of care,
6. No Machine Readable Information Provided and No Readable Standardized Statistics

We will be glad to meet with you to provide more details on our above comments and recommendations and look forward to your assistance in helping improve the health care services in Puerto Rico.

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