



June 20, 2023

Micky Tripathi, Ph.D., M.P.P.  
National Coordinator for Health Information Technology  
Office of the National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C St SW  
Washington, DC 20201

*Submitted electronically via regulations.gov*

Re: Health Data, Technology, and Interoperability: Certification Program Updates,  
Algorithm Transparency, and Information Sharing [RIN 0955–AA03]

Dear Dr. Tripathi:

The Academy of Managed Care Pharmacy (AMCP) thanks the Office of the National Coordinator for Health Information Technology (ONC) for the opportunity to provide comments in response to the proposed rule titled “Health Data, Technology, and Interoperability: Certification Program Updates, Algorithm Transparency, and Information Sharing” [RIN 0955–AA03], published in the Federal Register on April 18, 2023.

AMCP is the nation’s leading professional association dedicated to increasing patient access to affordable medicines, improving health outcomes, and ensuring the wise use of healthcare dollars. Through evidence and value-based strategies and practices, AMCP’s nearly 8,000 pharmacists, physicians, nurses, and other practitioners manage medication therapies for the 270 million Americans served by health plans, pharmacy benefit management firms, emerging care models, and government health programs.

AMCP supports the adoption and use of national standards that promote system interoperability among providers and payers, and the use of requisite sets of functional elements necessary for optimizing medication access, safety, and cost-effective utilization. Such standards have been developed to improve the exchange of healthcare information to improve quality in a cost-efficient manner. The use of information systems and technology advances productivity, improves customer satisfaction, and allows pharmacists to concentrate on clinical outcomes. Patients are the ultimate beneficiaries of these technological advances.

## **Health Equity**

Social determinants of health (SDOH),<sup>1</sup> such as income, education, employment, food insecurity, housing, neighborhood conditions, transportation, access to technology, and access

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<sup>1</sup> “Estimates differ, but most studies suggest that social, economic, environmental, and other nonmedical factors play a greater role in shaping population health than health care services.” Alderwick H. Meanings

to quality health care services, have a significant impact on health outcomes.<sup>2</sup> Although there is increasing awareness of SDOH by health care providers, plans, and policymakers, significant health care disparities continue.<sup>3</sup>

In 2023, AMCP adopted a strategic priority to address health disparities in medication use and access<sup>4</sup> and recently published a Health Equity Action Brief outlining AMCP's call to action on social determinants of health (SDOH).<sup>5</sup> Understanding the impact of SDOH factors on medication use and health outcomes can help managed care organizations (MCOs) develop interventions to address these inequities for their members. SDOH data helps MCOs understand the underlying causes of medication non-adherence, inadequate disease management, and poor health status. Collecting, analyzing, and utilizing SDOH data can help health plans understand their members' unique needs, develop targeted initiatives, and customize interventions.

AMCP applauds ONC's efforts to advance health equity by design and supports ONC's proposal to add the newly released United States Core Data for Interoperability (USCDI) v3, to include data elements such as sexual orientation and social determinants of health. AMCP believes that USCDI v3 would encourage greater collection of standardized SDOH data. We believe this is an important step in collecting usable SDOH data to better address health equity and improve patient outcomes.

## Real-Time Benefits

AMCP supports the establishment of a real-time prescription benefit health IT certification criterion. AMCP believes that the National Council for Prescription Drug Programs (NCPDP) Real-Time Benefit (RTPB) standard version 12 should be adopted as part of the potential certification criterion. Real-time benefits allow prescribers to see prescription benefit details at the point of prescription, such as patient out-of-pocket cost and coverage, formulary alternatives, and prior authorization requirements. This capability enables providers to make informed medication choices for their patients and prevent a bad experience at the pharmacy counter.

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and Misunderstandings: A Social Determinants of Health Lexicon for Health Care Systems. The Milbank Quarterly. June 2019. <https://www.milbank.org/quarterly/articles/meanings-and-misunderstandings-a-social-determinants-of-health-lexicon-for-health-care-systems/>

<sup>2</sup> "Socioeconomic factors can have a significant impact on a patient's health status and could be responsible for as much as 70%-80% of a patient's overall health." Payne, R., Vadhariya, A., and Villarreal, K., *Evaluating perceptions of social determinants of health and Part D star performance of Medicare Advantage-contracted primary care providers serving a South Texas market*. J Manag Care Spec Pharm, 2021 May;27(5):544-553. <https://doi.org/10.18553/jmcp.2021.27.5.544>. See also World Health Organization. "Social determinants of health," 2022. [https://www.who.int/health-topics/social-determinants-of-health#tab=tab\\_1](https://www.who.int/health-topics/social-determinants-of-health#tab=tab_1).

<sup>3</sup> Holm AL, Rowe Gorosh M, Brady M, White-Perkins D. Recognizing Privilege and Bias: An Interactive Exercise to Expand Health Care Providers' Personal Awareness. Acad Med. 2017 Mar;92(3):360-364. doi: 10.1097/ACM.0000000000001290. PMID: 27355785. <https://pubmed.ncbi.nlm.nih.gov/27355785/>

<sup>4</sup> <https://www.amcp.org/about/about-amcp/amcp-strategic-priorities>

<sup>5</sup> AMCP Health Equity Action Brief, June 2023, available at <https://www.amcp.org/sites/default/files/2023-06/SDOH-HEAB-Jun2023.pdf>

AMCP appreciates your consideration of the comments outlined above and looks forward to continuing work on these issues with CMS. If you have any questions regarding AMCP's comments or would like further information, please contact AMCP's Director of Regulatory Affairs, Geni Tunstall, at [etunstall@amcp.org](mailto:etunstall@amcp.org) or (703) 705-9358.

Sincerely,

A handwritten signature in cursive script, appearing to read "S. Cantrell".

Susan A. Cantrell, MHL, RPh, CAE  
Chief Executive Officer