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Eileen Prebensen, Senior Policy Counsel
Board of Registration in Medicine
200 Harvard Mills Square, Suite 330
Wakefield, MA 01880.

By electronic mail to: Eileen.Prebensen@state.ma.us

Re: Proposed Regulations on electronic health records training for physicians, 243 CMR 2.01(4), 2.02 and 2.06

Dear Ms. Prebensen:

On behalf of the Conference of Boston Teaching Hospitals (COBTH) and its member hospitals, I am pleased to offer comments for the Board's consideration related to the proposed regulations implementing St. 2012, c. 224, § 108. We appreciate the Board's desire to provide several pathways to demonstrate proficiency in electronic health records as well as exemptions for certain licensure categories, while still meeting the intent of the statute.

COBTH strongly supports BORIM's proposed regulations on the electronic health records training for physicians. We would however like to offer two recommendations which we believe will strengthen the regulation.

The first recommendation is to add those underlined portions below to the definition of a *Stage 1 Meaningful Use Program*:

Stage 1 Meaningful Use Program means a CMS (Medicare or Medicaid) Stage 1 EHR program of an Eligible health care Professional (EP), an Eligible Hospital (EH) or an eligible Critical Access Hospital (CAH) utilizing certified HER technology.

As CMS does not officially "certify" meaningful use, we recommend that the term "CMS certified" be deleted from sections 2.02(2)(f)(1)(b) and 2.06(2)(d)(1)(b) when identifying a Stage 1 Meaningful Use Program:

Employment with, credentialed by, or in a contractual agreement with an eligible hospital or critical access hospital with a CMS certified Stage 1 Meaningful Use program;

COBTH appreciates the opportunity to offer these comments and the work of the Board and its staff to promulgate these new required conditions of licensure.

Sincerely,

John Erwin
Executive Director