



AMERICAN SOCIETY OF
PLASTIC SURGEONS®



THE PLASTIC SURGERY
FOUNDATION™

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November 30, 2017

The Honorable John Thune
United States Senate
511 Dirksen Senate Office Building
Washington, DC 20510

RE: S.2059 – EHR Regulatory Relief Act of 2017

Dear Senator Thune:

I am writing on behalf of the American Society of Plastic Surgeons (ASPS) regarding S.2059. ASPS is the largest association of plastic surgeons in the world, representing more than 7,000 members and 94 percent of all board-certified plastic surgeons in the United States. We support this bill because it will reduce the burden that using electronic health records (EHRs) and attesting to the meaningful use (MU) incentive program puts on physicians.

For every hour physicians provide direct clinical face time to patients, nearly two additional hours are spent on EHR and desk work within the clinic day. Outside office hours, physicians spend another one to two hours of personal time each night doing additional computer and other clerical work.¹ While documentation is critical to delivering the highest quality of care to patients, the current MU requirements are unsustainable. The Centers for Medicare and Medicaid Services (CMS) has promised to change the MU program due to these concerns raised by medical providers since the fall of 2015. Therefore, the move away from the 100-percent, all-or-nothing approach to MU is long overdue.

Furthermore, we welcome the extension of the hardship exemption to providers for 2017, the codification of the 90-day reporting period, and the directive to Health and Human Services (HHS) to consider forthcoming recommendations from the Government Accountability Office (GAO) with respect to ensuring flexibility in assessing physician performance.

ASPS appreciates the opportunity to provide comments on the *EHR Regulatory Relief Act of 2017* and looks forward to working with you to advance this legislation. Please do not hesitate to contact Patrick Hermes, Director of Advocacy and Government Relations, at phermes@plasticsurgery.org or (847) 228-3331 with any questions or concerns.

Sincerely,

Jeffrey E. Janis, MD, FACS
President, American Society of Plastic Surgeons

¹ Christine Sinsky, Lacey Colligan, Ling Li, Mirela Prgomet, Sam Reynolds, Lindsey Goeders, et al. Allocation of Physician Time in Ambulatory Practice: A Time and Motion Study in 4 Specialties. *Ann Intern Med.* 2016;165:753–760. doi: 10.7326/M16-0961