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585 Stewart Avenue
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RE: Support for Exclusion to Meaningful Use Core Measure 8: Record and Chart Vital Signs

Dear Mr. Figliozi:

The American Academy of Ophthalmology is writing to document the validity of the exclusion of ophthalmologists from Meaningful Use Core Measure 8: Record and Chart Vital Signs. The Academy is the world's largest association of eye physicians and surgeons—Eye M.D.s—with 19,000 members in the United States. Eye M.D.s are ophthalmologists, medical and osteopathic doctors, who provide comprehensive eye care, including medical, surgical and optical care.

Recording height, weight, and blood pressure as required by Core Measure 8 is not relevant to the scope of practice for an ophthalmologist. Academy Preferred Practice Pattern® guidelines, the preeminent guidelines outlining the characteristics and components of quality eye care, do not support recording height, weight, and blood pressure for ophthalmic patients. These guidelines are developed by a panel of ophthalmologists with expertise in the guideline topic, a methodologist, and other quality of care experts and are based on the best available scientific data. Recommendations included in the Preferred Practice Pattern® guidelines are reviewed annually to ensure alignment with the most recent clinical literature.

As outlined in the Centers for Medicare and Medicaid Services (CMS) Final Rule, *Medicare and Medicaid Programs; Electronic Health Record Incentive Program* and CMS EHR Incentive Program FAQ #3217, an exclusion from recording and charting vital signs is available to eligible professionals who believe that recording and charting all three vital signs of height, weight, and blood pressure has no relevance to their scope of practice. Per Academy Preferred Practice Pattern guidelines, ophthalmologists meet the criteria to claim this exclusion.

Sincerely,



William L. Rich, III, MD, FACS
Medical Director, Health Policy