

November 25, 2019

Accredited Standards Committee X12
1899 L Street, NW, 11th Floor
Washington, DC 20036

Re: X12 Standards for Electronic Data Interchange Technical Report Type. X12 Standards for Electronic Data Interchange Change Log Health Care Claim: Institutional 837 Also submitted electronically at: <http://forums.x12.org/>

To Whom It May Concern:

On behalf of the 4,000 U.S. hospitals and health systems and more than 175,000 other providers and organizations in the Premier healthcare alliance, we are pleased to submit these comments in response to your request for comments on including medical device identification information in the electronic claim form. The Premier healthcare alliance, a 2006 Malcolm Baldrige National Quality Award recipient, maintains the nation's most comprehensive and largest healthcare databases in the industry. Premier works with its members on utilizing informatics, analytics, and data to improve care quality and patient safety, while achieving cost efficiencies. With integrated data and analytics, collaboratives, supply chain solutions, and advisory and other services, Premier enables better care and outcomes at a lower cost. Premier plays a critical role in the rapidly evolving healthcare industry, collaborating with members to co-develop long-term innovations that reinvent and improve the way care is delivered to patients nationwide.

Premier strongly supports the ANSI ASC X12's recommendation to include medical device identification information in the electronic claim form. The addition of medical device identifiers to health insurance claims forms will help ensure more accurate adverse event reporting, enable improved evaluations of marketed devices, reduce medical errors through improved device identification, decrease healthcare supply chain costs, and facilitate more comprehensive recall resolution. Patients, clinicians, providers, policymakers, regulators and researchers will have better data to help ensure high quality care, prevent harm and reduce cost. The UDI system can only achieve its potential to improve patient care once it is included in health insurance claims forms. Claims provide longitudinal information on patient care delivery and outcomes across the continuum of care, sites and providers. The incorporation of device identifiers to claims will provide an efficient way to understand the long-term safety and performance of different devices. Particularly in an era of value-based care, healthcare providers need this information to make informed decisions about the products they use.

Premier shares the vision of enabling healthcare providers to track medical devices electronically within the supply chain and across the care continuum. Including device identifiers in claims will help improve our understanding of device effectiveness and ensure patient safety related to adverse events.

We hope our comments are helpful as you continue this important work. If you have any questions regarding our comments or need more information, please contact Meryl Bloomrosen at Meryl_bloomrosen@premierinc.com or 202.879.8012.

Sincerely,



Blair Childs
Senior Vice President of Public Affairs
Premier healthcare alliance