

Response from Wheeler Clinic, Inc.

June 19, 2019

We are pleased to have received the compliance review report and happy to see that our hard work was recognized and that no corrective action plan was necessary. We are appreciative of the robust and thorough review your team conducted and that the process and report validates the achievements of our advanced network.

We found your recommendations to be very useful as we plan to move forward and would like to take the time to respond to some of the findings and recommendations as we continue to enhance the functioning of our network.

Related to the review area Program Operations referencing Wheeler's EMR as fragmented, we believe the review process did not fully explore the EMR's capabilities and how our staff use it.

We believe this observation was generated through the case review process which may have biased actual workflows and protocols used by staff. As explained to us in the meeting, another system (EPIC) has something akin to a patient dashboard. Since this is not a feature in Nextgen, recreating it would be expensive.

Therefore, we are requesting that the statement regarding the EMR as fragmented be removed from the report.

There are standardized work flows staff use that very quickly and efficiently provide them with the same information. On page 12 in the PCMH+ Program Operations Findings the report states " *The WC EMR also lacks specific documentation protocols and templates. Most patient information is contained within the history section of the record and not immediately accessible to the care team*". This is not accurate. All information in the record is immediately accessible to the care team and although it is not all located on one template, it can be quickly and efficiently navigated.

Therefore, we are requesting this section be removed from the report.

Again, we felt the case review process was not reflective of how our staff would review the record so we would like to offer you a further opportunity to view this. We are very proud of the work we've done customizing Nextgen and believe it is the most capable application to support integrated care.

Thank you for your consideration of these important issues.