

September 12, 2016

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Alissa Craft, DO, MBA
Secretary, Commission on Osteopathic College Accreditation
American Osteopathic Association
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Dear Drs. Hunt and Craft,

We are writing to encourage the Association of American Medical Colleges and the Commission on Osteopathic College Accretation to further promote meaningful use of the electronic health record (EHR) by medical students

The impetus for this letter is a resolution passed by the Board of Regentisthe American College of Physicians (ACP) in May, 2016, and endorsed by the undersigned members of the internal medicine educational community.

Barriers to student access to the EHR take many forms, including technical complexities for providing access, medicolegal concerns associated with sturtedocumentation, and issues associated with confidentiality related to Health Insurance Portability and Accountability Act (HIPAA) regulations. Additionally, guidelines from the Centerfor Medicare and Medicaid Services (CMS)and other relevant federal agencies mitting the use of student documentation for billing purposes raise potential compliance issues and the need for duplicate documentation which also encourage restricted student use of the EHR.

Yet, multiple medical education organizations havemphasized the importance of developing communication skills by medical students that relate to the ability to effectively use the EHR. The Liaison Committee on MedicaEducation (LCME)states that curriculamust "prepare medical students for entry into graduate medical education" ad "include specific instruction in communication skills as they related physician responsibilities, including communication with patients and their families, colleagues, and other health professionals." The recently published Core Entrustable Professional Activities for Entering Residency by the Association of American Medical Colleges (AAMC) include multiple expected competencies for undergraduate medical students related to use of the EHR, including entering and discuiss orders (EPA 4), documenting a clinical encounter in the patient record (EPA 5), and giving or receiving a patient handover to transition care responsibly (EPA 8). The United States Medical Licensing Examination (USMLE) also evaluates a student's ability to write notes in electronic form as part of the USMLE Step 2 Clinical Skills Examination? Additionally, the Accreditation Council for Graduate Medical Education (ACGME)core program requirements state that residents are expected to "maintain comprehensive, timely, and leible medical records" and the Program Requirements for Graduate Medical Education in Internal Medicine state specifically that the sponsoring institution and participating sites must provide access to an electronic health recorn show commitment to its development and implementation (.A.2.g)<sup>5</sup> Finally, several internal medicine residency training milestones (utilization and completion of medical records, interprofessional team communication, and patient care transitions) relate to the need to effectively use the EHR.

Impaired medical student access to or limitations on their use of the EHR threatens development of these important competencies needed for continued training, licensure, and the lifelong practice of medicine.

In 2012 the Alliance for Clinical Education (ACE) the umbrella organization of undergraduate clinical medical educators, published four principles believed to be critical to the development of the needed knowledge and skills of medical students surrounding the use of the EHR

- A. Students must document in the patient's charand their notes should be reviewed for content and format
- B. Students must have the opportunity to practice order entry in arEHR—in actual or simulated patient cases—prior to graduation.
- C. Students should be exposed to the utilization of the decision aidsat typically accompany EHRs
- D. Schools must develop aset of medical student competencies related to charting in the EHR and state how they would evaluate it. This should include specific competencies to be documented at each stage, and by time of graduation.

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<sup>2</sup> Association of American Medical Colleges. "Core Entrustable Professional Activities for Entering Residency; Curriculum Developers' Guide. 204.
<sup>3</sup> United Stat21(2) re7>1Tledigip32innlatt1natit2nu RtoCniiniin5ynintontlinatit2nnt25ye3.4(n)erl 3