I have recently received and reviewed the proposal for adding several measures to the quarterly reporting requirements. Given the nature of the data requested in this rule it would put another regulatory burden on our facility that would be very difficult to comply with going forward. The data requested is not easily reported from our electronic billing systems and/or electronic health record. Therefore it would require a manual calculation by reviewing each and every case and tabulating the results by hand. I urge you all to consider this burden before moving forward with this requirement as it would immediately create a status of non-compliance for most facilities because of the simple fact that the data is not available in an automated fashion.

Sincerely, Steve

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