Fenway Health Comments on Stage 2 proposed Meaningful Use Guidelines (CMS-0044-P)

This comment addresses the following:

2014 Edition EHR Certification Criterion
§ 170.314(a)(3) (Demographics)
MU Objective

The standards proposed for this are:

§ 170.207(f)(OMB standards); § 170.207(j) (ISO 639-1:2002); and § 170.207(k) (ICD-10-CM)

We strongly support the inclusion of sexual orientation and gender identity in these standards, as recommended by the 2011 Institute of Medicine report on LGBT health.

Fenway Health recently evaluated the best way to ask about sexual orientation on its patient registration form. Based on this evaluation, the following question has been added:

Do you think of yourself as:

__ Lesbian, gay or homosexual

__ Straight or heterosexual

__ Bisexual

__ Something else

__ Don't know

We are currently evaluating a gender identity measure, and expect results by September 2012. The asking of questions about sexual orientation and gender identity in clinical settings is critical to better understanding and eliminating LGBT health disparities, a key goal of Healthy People 2020. Understanding populations served is essential to developing effective programs to improve population health. Gathering sexual orientation and gender identity data in a standardized way will allow us to better understand LGBT health disparities, as well as to prevent, screen and early detect conditions that disproportionately affect LGBT people.

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