



1730 M Street, NW, Suite 502
Washington, DC 20036

phone » (202) 659-9440
fax » (202) 659-9422
web » www.ahima.org

September 16, 2010

Ms. Sherette Funn-Coleman
OS Report Clearance Officer
Dept. of Health and Human Services
200 Independence Ave. SW
Washington, DC 20201

Re: Evaluation of the IT Professionals in Health Care—OMB No. 0990—NEW—Office of the National Coordinator for Health Information Technology (ONC) (75 *Federal Register* 52345)

Dear Ms. Funn-Coleman:

The American Health Information Management Association (AHIMA) welcomes the opportunity to comment on the Office of the National Coordinator (ONC) proposed project, Evaluation of the IT Professionals in Health Care—OMB No. 0990—NEW—Office of the National Coordinator for Health Information Technology as published in the August 25, 2010 *Federal Register*. Our comments focus on those areas of particular interest to our members and we are recommending the evaluation include all education programs leading to professional credentials in areas associated with electronic health records (EHRs) and health information exchange goals.

AHIMA is a not-for-profit professional association representing more than 59,000 health information management (HIM) professionals who work throughout the healthcare industry. AHIMA's HIM professionals are educated, trained, and certified to serve the healthcare industry and the public by managing, analyzing, reporting, and utilizing data vital for patient care, while making it accessible to healthcare providers and appropriate researchers when it is needed most. HIM professionals are also trained to leverage their expertise in supporting and protecting health information captured in paper, electronic, and hybrid health record environments. AHIMA and its members also participate in a variety of projects with other industry groups and agencies of the Health and Human Services Department related to the use of secondary data for a variety of purposes including quality measurement, public health, patient safety, biosurveillance, research and administrative functions.

AHIMA strongly supports ONC's effort to launch a program that will evaluate information technology (IT) professionals in health care workforce programs. We believe this effort is necessary to assure a workforce is properly trained and equipped to be meaningful users of EHRs and there is proper performance of the agency's functions and initiatives. We also believe this activity will help to establish a baseline of the current workforce programs and allow ONC to assess where attention and resources must be focused to continue the much needed training and education of current and new professionals.

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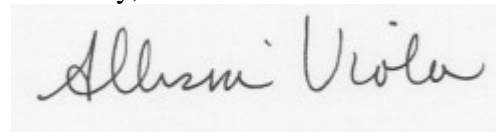
We support the data collection efforts as described in the proposal. We are in agreement with the process of conducting follow-up surveys to assess how successful the program was through the continuum of the education to work lifecycle.

We understand the focus of the data collection initiative is to assess the Workforce Program under the Health Information Technology for Economic and Clinical Health (HITECH) Act of 2009. The initial focus of the education and workforce training is to aid eligible professionals and eligible hospitals achieve meaningful use in Stage 1 and beyond. We appreciate the urgency in which resources must be trained to support this initiative, however we believe focusing only on the Workforce Programs is shortsighted during this critical time of EHR adoption and implementation. AHIMA recommends ONC broaden the study to include all HIM/HIT/Informatics programs that are not addressed in the HITECH Workforce Program as we believe this will provide a more complete picture of the environment from which future program planning can occur. We note that the Commission on Accreditation for Health Informatics and Information Management Education (CAHIIM) accredits nearly 300 programs across the country and may serve as a resource in your project.

Rationale: To achieve a true measure of the workforce to support EHR adoption and implementation, there must be an assessment of the Workforce Program and other programs that support and serve as the foundation of these efforts. Programs that include HIT and HIM programs are critical components of becoming meaningful users of EHRs. HIM professionals are uniquely trained and have skill sets in the areas of health care privacy and security, quality measurement, workflow redesign, EHR implementation, clinical data collections and use, terminologies and classifications, and health information exchange. Without these skills at a minimum, the industry will continue to be challenged to achieve meaningful use now and in the future when the program is no longer voluntary.

AHIMA also stands ready to support you in this endeavor and if we can provide any further information or if there are any questions regarding this letter and its recommendations, please contact me at (202) 659-9440 or allison.viola@ahima.org, or AHIMA's vice president, policy and government relations, Dan Rode, at (202) 659-9440 or dan.rode@ahima.org. If we can be of further assistance to you in your efforts, we would welcome the opportunity to provide support.

Sincerely,



Allison Viola, MBA, RHIA
Director, Federal Relations

cc: Dan Rode, MBA, CHPS, FHFMA, Vice President, Policy and Government Relations