September 20, 2016

Standard Occupational Classification Policy Committee
U.S. Bureau of Labor Statistics
2 Massachusetts Avenue, NE
Suite 2135
Washington, DC 20212

VIA ELECTRONICALLY

To the Standard Occupational Classification Policy Committee Chair:

On behalf of the American Health Information Management Association (AHIMA), we appreciate the opportunity to offer our support and appreciation for the U.S. Department of Labor’s work on the Office of Management and Budget’s (OMB) efforts to update the Standard Occupational Classification codes to reflect current market trends.

AHIMA is the national non-profit association of health information management (HIM) professionals. Serving 52 affiliated component state associations including the District of Columbia and Puerto Rico, AHIMA represents over 103,000 health information management professionals dedicated to effective health information management, information governance, and applied informatics. AHIMA’s credentialed and certified HIM members can be found in more than 40 different employer settings in 120 different job functions—consistently ensuring that health information is accurate, timely, complete, and available to patients and providers. AHIMA provides leadership through education and workforce development, as well as thought leadership in continuing HIM research and applied management for health information analytics.

Although the update to the Standard Occupational Classification codes addresses a number of changes, we offer specific comments below related to Medical Registrar and Records Specialist (SOC 29-2070) and Health Information Technology, Health Information Management and Health Informatics Specialists and Analysts (SOC 29-9020).

**Medical Registrar and Record Specialists (SOC 29-2070)**

AHIMA appreciates the proposed title revisions to the Medical Registrar and Records Specialist (SOC 29-2070). Additionally, AHIMA supports the proposed changes to the detailed title and definition of Medical Registrar and Records Specialists (SOC 29-2071). We believe the proposed definition appropriately reflects enhanced competencies and skills related to oversight in
compiling, processing, and maintaining medical records across various healthcare systems with respect to administrative, ethical, and regulatory requirements.

**Health Information Technology, Health Information Management, and Health Informatics Specialists and Analysts (SOC 29-9020)**

AHIMA also supports the proposed title revisions to the Health Information Technology, Health Information Management and Health Informatics Specialists and Analysts (SOC 29-9020) including the detailed definition for the Health Information Technology, Health Information Management, and Health Informatics Specialists and Analysts (SOC 29-9021). AHIMA believes that the proposed definition will provide clarity to expanded roles of health information professionals in a digital world. As healthcare evolves, the Health Information Technology, Health Information Management, and Health Informatics professions will have expanded roles related to the implementation and evaluation of informatics solutions including data analytics, clinical decision support, and computer-human interface to support and enhance patient care.

We thank you for your consideration of AHIMA’s comments and recommendations for modifications to the Standard Occupational Classification codes. We believe these proposed changes and recommendations will improve the accuracy of the classification system and data available in the current labor market. Should you or your staff have any additional questions or comments, please contact Dr. William Rudman, Executive Director of the AHIMA Foundation at (312) 233-1168 or bill.rudman@ahimafoundation.org

Sincerely,

Lynne Thomas Gordon, MBA, RHIA, CAE, FACHE, FAHIMA
Chief Executive Officer