

September 29, 2015

Office of the National Coordinator  
U.S. Department of Health & Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

**RE: Statement of Support for ongoing Collaboration specific to “Connecting Health and Care for the Nation, A Shared Nationwide Interoperability Roadmap”**

Dear Dr. DeSalvo:

On behalf of the American Health Information Management Association (AHIMA), we present this letter of support for ongoing efforts specifically addressed in the Office of the National Coordinator document entitled “Connecting Health and Care for the Nation, A Shared Nationwide Interoperability Roadmap (the Roadmap) .”

AHIMA is a nonprofit membership association representing over 101,000 health information management (HIM) professionals. These professionals work in a variety of sites that collect, store, analyze, use, and disclose protected health information. HIM professionals have been the stewards of health information confidentiality for decades and with the advent of the HIPAA privacy and security requirements many serve as privacy or security officers for HIPAA covered entities, assuring that patient information is available when and where it is needed in compliance with federal and state laws.

Our work specific to governance of information in healthcare, applications of coding classification systems (standards for reimbursement and electronic data movement) as well as a rich history of providing analytics and applied health data in healthcare operations, make us uniquely qualified to continue to provide expertise to you and the ONC team in discussions for advancing the Roadmap.

Our members are experienced and trusted professionals in the operational area of releasing information, whether in paper or electronic formats. As the legally designated “keepers of the records” we protect the legal health record to ensure that patients, patient representatives, providers and others who are requesting records, receive the correct information about the correct patient released for lawful reasons, each and every time.

Most specifically in support of these national Roadmap efforts AHIMA will:

**Continue efforts to educate regarding the appropriate interpretation of federal and individual state laws that apply to release of information regardless of the storage format.** A great deal of confusion and mis-information exist regarding the legal responsibility of providers

relative to consumers' right to access information; AHIMA has been working collaboratively to provide easily understood educational materials that can be used by both patients, and others who are lawfully acting on behalf of patients, to access information. Increasing complexity in the capture and storage formats of information, while increasing the amount of data available, should not create situations where "no" becomes the default answer when the law is also complex. AHIMA's members have a long history (since 1928) of providing lawful access to records – we look forward to finding solutions to unlock the misunderstandings that are creating blocking barriers and to bringing access to consumers, providers and others with lawful reasons to access information.

**Continue to educate and advocate for both algorithms that support enhanced patient matching and for the adoption of unique patient identifiers.** The challenges of combining multiple stand-alone and enterprise patient master indices for regional health information organizations have highlighted the difficulties inherent in correctly identifying the individual patient. This exacerbation of redundancies and the cost of back-end cleanup threaten to bring many information movement efforts to a standstill. With this in mind, and with the increasing costs of performing patient matching on the "back end," AHIMA will continue to advocate for unique patient identification solutions that place the patient/consumer at the center of voluntary identifier efforts.

**Continue our work relative to interoperability standards, information governance and standardization of information classification.** AHIMA's members work tirelessly in supporting standards that add value to applied analytics specific to health information. AHIMA's international work supporting global standards, i.e. serving as Secretary for International Standards Organization/Technical Committee (ISO/TC) 215, ICD-10, etc., has proven AHIMA's value in understanding not only the clinical care aspects of information but also the use of data for secondary applications. We continue to work with our international partners in identifying opportunities for improvement in information applicability across the globe; it is this same expertise that we look forward to sharing with ONC and our national partners. Additionally, we continue our efforts to ensure that data maintains its integrity throughout the life of the data through our work in advancing specific principles for information governance in healthcare. We will gladly discuss this important work at your convenience.

We look forward to future and ongoing collaboration with ONC and others, including consumers, in seeking solutions that will work across the healthcare ecosystem, ultimately increasing quality and outcomes, removing access barriers and lowering costs! Nothing is more essential to providing safe, quality patient care than the ability to select the correct patient in each and every encounter, ensure that data is available in formats that are standardized for understanding and consumption and in secure, lawful circumstances.

If you have additional questions or concerns regarding this response, or other questions with regard to AHIMA's efforts in future collaboration please feel free to contact Pam Lane, vice

president, policy and government relations for AHIMA at (312) 233-1526 or  
[pamela.lane@ahima.org](mailto:pamela.lane@ahima.org)

Sincerely,

Cassi Birnbaum, MS, RHIA, CPHQ, FAHIMA  
President/Chair



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