



## **Public Comment on ONC Common Agreement and Exchange Framework**

**AHIMA Final Uploaded Comments – 8/25/2017 8:20pm EDT**

**Submitted by: Deborah Green**

### **Comment Area 1: Standardization**

AHIMA agrees that technical standards, policies and best practices around use of and adherence to technical standards are imperative to a trusted exchange framework and to a common agreement for trusted exchange. These technical standards are chiefly focused on transmission and security. While these standards are of course imperative, these alone do not ensure the accuracy/trustworthiness of exchanged data and information. Adoption of standards critical to the “use” side of the interoperability equation held within the Section 4003 definition of interoperability\* must be required. Standards that support the “use” of exchanged information include those falling into the categories of: Functional Interoperability (Business, Functional and Safety Standards) and Semantic Interoperability (Data, and Information Content Standards) \*\*. AHIMA, as the designated Secretariat for ISO/TC 215 (Global Informatics Standards) and Administrator of the US Technical Advisory Committee to TC215, and as the professional association representing over 103,000 health information professionals, urges formal recognition of these standards as essential to health information interoperability.

At the level of a national trusted exchange network we will be exchanging enormous of granular data and individual record sets generated/captured at the local level by thousands of EHs and EPs largely without best practices for data and information governance in place (based on AHIMA IG Surveys 2014, 2015 and 2017\*\*). If we do not address standards and best practices for data and information from capture, use, exchange and re-use, we cannot trust it for safe, quality care of the individual or for use in improving the health of our populations.

Regarding some specifics in Section 4003 on HIT Standards, AHIMA agrees with the provision regarding the need for a core set of common data elements and associated values to enhance the ability of certified HIT to capture, use and exchange structured electronic health information. AHIMA can reach out to its vast membership of HIT and Health Information Management (HIM) professionals to provide input on data elements, definitions, and value sets.

AHIMA additionally stands ready as a stakeholder, to review, evaluate and provide input on Health IT standards and implementation specifications.

\*Section 4003 defines interoperability as “HIT technology that: (a) enables the secure exchange of electronic health information with, and use of electronic health information from, other health information technology without special effort on the part of the user, (b) allows for the complete access, exchange, and use of all electronically accessible health information for authorized use under applicable state and federal laws and (c) does not constitute information blocking”.

\*\* A detailed listing of Functional and Semantic Interoperability Standards may be obtained through:

[standards@ahima.org](mailto:standards@ahima.org) Free white papers and IG adoption resources available through:

[IGAdvisors@ahima.org](mailto:IGAdvisors@ahima.org)

### **Comment Area 2: Transparency**

Transparency on processes for exchange and uses of information will be essential to ensure that all parties to exchange are compliant with provisions of the Act that prohibit information blocking. Transparency of information governance practices is a principle of information governance, and promoted by AHIMA.

### **Comment Area 3: Cooperation and Non-Discrimination**

Cooperation and non-discrimination must be mandated in agreements on trusted exchange to ensure that competition and conflicts of interest do not compromise health information and care of individuals, groups or populations.

### **Comment Area 4: Security and Patient Safety**

Exchanging electronic health information securely and in a manner that promotes patient safety assumes that providers' data and information are trustworthy and have integrity (accurate, complete, timely, reliable). Ensuring this requires comprehensive information governance at the provider level and at the level of other healthcare ecosystem associates with whom they partner in the provision of services. This also requires that every exchange service practices information governance. The framework for trusted information exchange should require that all parties practice information governance, and the agreement for trusted exchange should require that all parties practice information governance and hold their exchange partners accountable for ongoing comprehensive information governance practices.

### **Comment Area 5: Access**

AHIMA agrees that access to and availability of information by patients and their caregivers are essentials of healthcare. Predecessors of access and availability include but are not limited to technical infrastructure, appropriate information and data architecture, data standards and data management, information management and establishment of essential policies and practices. Comprehensive information governance by providers and exchange organizations will help to ensure these are in place.

### **Comment Area 6: Data-Drive Choice**

AHIMA supports data-driven choice as essential to increased quality and safety, and reduced costs of care. AHIMA further believes that reliable granular data are essential to get to reliable big data, enabling reliable analytics and research for data-driven decision making. Information governance is essential in order to rely on granular, aggregate and big data. Data-driven choice requires information governance practices by all information intensive organizations in the healthcare delivery ecosystem.

### **General Comments**

AHIMA applauds and supports ONC efforts to create a trusted information exchange framework and a common agreement, including a common agreement among health information networks nationally.

We believe that trusting the exchange of health information at the local, regional and national level depends on use of standards, standard practices, accountability, and a commitment to competence in information governance by every information intensive organization in the healthcare ecosystem. We believe that wide-spread adoption of information governance practices across healthcare is essential to enabling trust in our information and trust in its exchange.