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This letter represents comments submitted electronically via [HHS' web portal](#).

October 14, 2010

Agency for Healthcare Research and Quality
Attention: Nancy Wilson
540 Gaither Road, Room 3216
Rockville, MD 20850

Re: National Health Care Quality Strategy and Plan

Dear Ms. Wilson:

The American Health Information Management Association (AHIMA) welcomes the opportunity to provide input to the initial principles and framework for a National Health Care Quality Strategy and Plan put forth by the Secretary of the Department of Health and Human Services (HHS).

AHIMA is a not-for-profit professional association representing more than 60,000 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 participate in a variety of projects with industry groups and federal agencies addressing the use of secondary data for a variety of purposes including quality measurement, public health, patient safety, biosurveillance, research and administrative functions.

The comments below focus on those areas of particular interest to our members.

HHS Question (p. 6): Using the legislative criteria for establishing national priorities, what national priorities do you think should be addressed in the initial National Health Care Quality Strategy and Plan in the following areas: a.) Better Care; b.) Affordable Care; c.) Healthy People/Healthy Communities?

Allied Health Workforce

To enhance the use of health care data and improve quality, efficiency, transparency, and outcomes, AHIMA strongly recommends that the national priorities and goals recognize the

need for continued workforce development to address the shortage of trained workers in the allied health professions. These professionals impact a broad range of healthcare operations that enable a clinician's ability to render high quality clinical care.¹ Specifically, health information management professionals possess unique knowledge in:

- Data content, structure, and standards;
- Confidentiality, privacy, and security management;
- Electronic health record life cycle;
- Data administration and analytics;
- E-Discovery;
- Personal health information management;
- Reimbursement, regulatory compliance, and fraud surveillance; and
- Organization and management of information.

Emphasizing the need for more qualified allied health professionals to support the national priorities and goals proposed in the National Health Care Quality Strategy and Plan is critical.

Health Information Technology Infrastructure

Although the overview section implies alignment with meaningful use of health information technology, the topic is otherwise excluded from the overall strategy and plan. AHIMA recommends incorporating priorities that align with and support meaningful use priorities, objectives and measures within the context of overall industry needs.

Care Coordination

To better align with the health outcome policy priorities defined for meaningful use, AHIMA recommends adding "care coordination" as an explicit national priority. Improvements in health care quality will require coordinated strategies that support improved communications between patients and providers, as well as the continuity of care across acute and non-acute healthcare settings.

HHS Question (p. 7): *Are there existing, well-established, and widely used measures that can be used or adapted to assess progress towards these goals? What measures would best guide public and private sector action, as well as support assessing the nation's progress to meeting the goals in the National Quality Strategy?*

AHIMA strongly supports HHS' intent to align the National Health Care Quality Strategy and Plan with existing programs that assess and improve health care quality. Building upon and aligning with measures used in both public and private initiatives will enable streamlined reporting requirements and more efficient use of healthcare resources.

HHS Question (p. 8): *What are some key recommendations on how to engage with States and ensure continued alignment with the National Quality Strategy?*

HHS should consider leveraging the existing Quality Improvement Organization (QIO) and Regional Extension Center (REC) infrastructure to support engagement and alignment with States. These entities are familiar with the local needs of the provider community and have existing relationships with local public and private stakeholders that will enable effective and efficient communication and coordination.

AHIMA stands ready to support you in this endeavor and if we can provide any further information, please contact me at (202) 659-9440 or dan.rode@ahima.org or AHIMA's director of practice leadership, Crystal Kallem, at (312) 233-1537 or crystal.kallem@ahima.org.

Sincerely,

A handwritten signature in blue ink that reads "Dan Rode". The signature is fluid and cursive, with the first name "Dan" being larger and more prominent than the last name "Rode".

Dan Rode, MBA, CHPS, FAHIMA
Vice President, Policy and Government Relations

cc: Crystal Kallem, RHIA, CPHQ, Director Practice Leadership

¹ AHIMA and AMIA. "Building the Work Force for Health Information Transformation." Available at www.ahima.org.