



April 18, 2017

The Honorable Tom Cole  
Chairman  
Appropriations Subcommittee on Labor, Health and Human Services, Education and Related Agencies  
U.S. House of Representatives  
Washington, DC 20515

The Honorable Rosa DeLauro  
Ranking Member  
Appropriations Subcommittee on Labor, Health and Human Services, Education and Related Agencies  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairman Cole and Ranking Member DeLauro:

As your Subcommittee undertakes drafting of the FY2018 Labor, Health and Human Services, Education and Related Agencies (Labor-HHS) appropriations bill, we urge you to **maintain sufficient funding for the Office of the National Coordinator for Health Information Technology (ONC) to meet its statutory obligations under the 21<sup>st</sup> Century Cures (“Cures”) Act.**

As you know, the Cures Act overwhelmingly passed Congress last year. The legislation contained a number of priorities critical to AHIMA, the national non-profit association representing health information management professionals, including, but not limited to:

- **Health IT Standards/Health IT Advisory Committee:** While AHIMA is not a standards development organization (SDO), AHIMA serves as the ANSI-appointed Secretariat to the ISO/Technical Committee 215 on Health Informatics (ISO/TC215), and as Administrator of the United States Technical Advisory Group (US TAG), the delegation representing the US to ISO/TC215. ISO/TC215's mission is to improve compatibility and promote interoperability between electronic health records (EHRs), personal health records (PHRs), medical devices, and other healthcare systems through the development of standards. ONC's role in convening the Health IT Advisory Committee to identify, review, and recommend standards and implementation specifications, (as required by Cures,) is critical not only to advancing a core set of common data elements that will enhance the capture, use, and exchange of structured electronic health information but in advancing overall nationwide interoperability.
- **Trusted Exchange Framework:** As stewards of trusted health information, AHIMA believes that Information Governance (IG)—the development of an organization-wide framework for managing information throughout its lifecycle and supporting the organization's strategy, operations, regulatory, legal, risk and environmental requirements—is a critical organizational initiative that healthcare organizations must embrace to thrive in the environment of transformational change in healthcare today. AHIMA has created an Information Governance Adoption Model (IGAM) which assesses and scores a healthcare organization using 10 IG

organizational competencies. Each competency includes several key maturity markers that identify critical requirements that must be met to optimize maturity in information governance. AHIMA's IG work can play a critical role in helping advance the voluntary trusted exchange framework for trust policies and practices as required under the Cures Act. However, without ONC's ability to convene interested parties to build and support the trusted exchange framework due to lack of sufficient funding, we are concerned that the development of this framework will languish, thereby hindering nationwide interoperability.

- **Improving patient access to their electronic health information:** HIM and privacy professionals play a critical role as the patient-facing representatives responsible for helping patients access their health information as required under the Health Insurance Portability and Accountability Act (HIPAA) and the Meaningful Use program. However, many healthcare organizations still struggle to provide patients and consumers with their complete electronic health record via a patient portal beyond a few minimal elements including lab and radiology tests. In turn, this has a significant impact on patient safety, patient engagement, and population health. ONC has served (and we hope will continue to serve) as an important federal partner in not only assisting both patients and providers in understanding a patient's right of access under HIPAA but also in disseminating best practices for fulfilling patient access requests for their health information.

Overall, AHIMA is concerned that the President's current proposed FY18 budget request will not provide ONC with the sufficient funding to meet the above obligations set forth by Congress. We understand that Congress faces difficult choices in funding a variety of priorities with limited resources. However, failure to adequately fund ONC will undermine a major tenet of the Cures Act itself—"the delivery of new drugs and devices to the right patient at the right time by ensuring electronic health record systems are interoperable for seamless patient care and . . . [to] fully realize the benefits of a learning health care system."<sup>1</sup>

We appreciate your consideration of our request and look forward to working with the Committee to ensure that ONC has sufficient funding to meeting its statutory obligations under the Cures Act. Should you or your staff require additional information, please contact Lauren Riplinger, Senior Director, Federal Relations at 202-839-1218 or via email at [lauren.riplinger@ahima.org](mailto:lauren.riplinger@ahima.org).

Sincerely,



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

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<sup>1</sup> Available at:

<https://energycommerce.house.gov/sites/republicans.energycommerce.house.gov/files/documents/114/analysis/20161128%20Cures%20Fact%20Sheet.pdf>.