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January 9, 2009

National Quality Forum
Attn: Tony Burton
601 13th Street, NW
Washington, DC 20005

Dear Mr. Burton:

The American Health Information Management Association (AHIMA) welcomes the opportunity to comment on the National Quality Forum's (NQF) request for member input on recommendations to Members of Congress and the new Administration on how best to build upon the work that has been underway regarding the enhancement of a performance measurement and improvement enterprise.

AHIMA is a not for profit professional association representing more than 52,000 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 collecting, managing, analyzing, reporting, and utilizing data which is vital for patient care, while making it accessible to healthcare providers and appropriate researchers when it is needed most.

AHIMA and its members participate with other industry groups and federal agencies in projects related to the use of healthcare data for a variety of purposes including direct care, quality measurement, reimbursement, public health, patient safety, biosurveillance, and research. Our comments below focus on those areas of particular interest to our members. We have outlined some suggestions for consideration as NQF continues to refine the infrastructure recommendations.

Page 1: General Comment

AHIMA strongly supports NQF's call for an increased public investment in the measurement and improvement infrastructure that would ultimately advance efforts of an overall improved healthcare delivery system. Along with our support of the core principles that serve as the backbone to the proposal for an increased need, are our concerns that without the foundational planning and development of a harmonized approach toward standard terminologies and classifications, there will never be a fully functioning standardized measurement, data collection and reporting process on a national and local scale. Standard terminologies and classifications

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form the information content within an electronic health record that serve as the basis for public health reporting, performance measurement and quality reporting, research, and other uses of healthcare data. AHIMA recommends NQF insert language that would call for the need to develop and maintain standard terminologies and classifications as an additional core principle which would serve as a critical element in building and enhancing the infrastructure. We would accept the opportunity to provide additional information on this concept if desired.

Page 3: General Comments

The letter, while discussing the development of a better foundation, does not outline how the proposed infrastructure enhancements will align with the overall national and local infrastructure that is currently in place. There have been several programs implemented over the last few years, as highlighted in the paper on page 1, and it is difficult to determine where the gaps exist and how NQF's recommendations will address the gaps. Moreover, AHIMA is concerned there is no discussion within the letter on the processes by which the defined goals will be achieved. NQF identifies a substantial amount of public dollars to be allocated for the enhancement of the foundation for improved performance measurement; however we recommend more details be provided regarding the process on how the goals will be achieved.

Page 4, Function 4: Collect, Analyze and Make Performance Information Available

As described in this section, NQF calls for national collection and reporting to “assure that there is a core of national consistency and comparability, and that every community has a common foundation for performance information.” In order to accomplish this large mission, AHIMA recommends NQF provide additional information on the need for developing and maintaining standard terminologies and classifications to achieve high quality data and information in support of the transformation toward interoperable health information systems and high quality healthcare.

In support of the need for developing and maintaining standard terminologies and classifications, AHIMA strongly urges NQF to complement these concepts by calling for the development and implementation of a national health data steward. The purpose of a national health data steward is to define and enforce the principles and guidelines by which the administration of data is addressed. Currently, there is a lack of focus and coverage regarding the quality measurement enterprise as it relates to the infrastructure and logistics that represent the following:

1. Data aggregation
2. Data collection
3. Attribution
4. Methodologies
5. Data analysis
6. Data validation

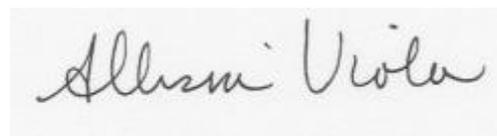
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7. Uses of data
8. Data access
9. Data sharing and reporting
10. Privacy and Security
11. Data content and structure

The principles identified are those components from the Agency for Healthcare Research and Quality (AHRQ) request for information regarding the concept of a national health data stewardship entity (72 FR 30803). This proposed organization would establish the policies, rule and standards to help guide organizations that support the efforts called for within the NQF letter. The goal is not only to address data stewardship needs for quality, but to also address stewardship principles for all uses of data such as research, administration, population health reporting, and patient safety. NQF has successfully served in a role that is based upon consensus-building activities among many public-private stakeholders within the healthcare quality industry, which is critical to forming a data stewardship model. NQF currently serves in a key role within the quality measurement enterprise, and is a natural fit for the proposed stewardship model. AHIMA recommends inserting an additional function, Function 5: Establishment of a National Health Data Stewardship Entity.

If AHIMA can provide any further information or if there are any questions regarding this letter and its recommendations, please contact me at (202) 659-9440 or allison.viola@ahima.org or AHIMA's NQF representative and Director of Practice Leadership, Crystal Kallem, RHIA at (312) 233-1537 or crystal.kallem@ahima.org.

Sincerely,



Allison Viola, MBA, RHIA
Director, Federal Relations

cc: Crystal Kallem, RHIA Director, Practice Leadership
Dan Rode, MBA, FHFMA Vice President, Policy and Government Relations