



May 31, 2007

Office of the National Coordinator for Health Information Technology
Attention: Consumer Access to Clinical Information Use Case Team
Mary Switzer Building
330 C Street, S.W. Suite 4090
Washington, DC 20201

Dear Consumer Access to Clinical Information Use Case Team:

The American Health Information Management Association (AHIMA) welcomes the opportunity to comment on the Office of the National Coordinator's (ONC) Consumer Access to Clinical Information Draft Detailed Use Case.

AHIMA is a not-for-profit professional association representing more than 51,000 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.

AHIMA and its members participate in a variety of projects with other industry groups and Federal agencies 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 focus on those areas of particular interest to our members. We believe the use case is a good foundation; however, we have outlined some recommendations as ONC continues to expand the document.

Section 1.1 Use Case Description

We would suggest that adding the following to the list of AHIC's prioritized needs: Emergency Contact Information: Ability for consumer to retrieve and store lists of current emergency contact information. We submit that this is critical information to have when in an emergent situation and the consumer cannot remember a phone number, or a provider needs to locate an emergency contact person.



233 N. Michigan Ave., 21st Floor, Chicago, IL 60601
phone (312) 233-1100 · *fax* (312) 233-1090 www.ahima.org

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Section 2.0 Use Case Stakeholders

HIM professionals responsible for managing, collecting, aggregating, and reporting data should be added to the list of stakeholders. Serving as essential data stewards of a healthcare organization, they provide a critical link in the data flow chain. HIM professionals have in-depth knowledge of the challenges associated with data quality and information workflow. Improving the quality of the data in hospital and ambulatory EHR systems may result in better information exchanged with PHR systems.

Section 7.1.4.1 Review Access and Disclosure Logs

This section correctly describes the various places a consumer may view access logs. We would ask that the consumer also be informed that when requesting access logs from a provider-sourced system, there is a process to request an accounting of disclosures from that provider.

AHIMA thanks ONC for this opportunity to submit our findings on this issue. If AHIMA can provide any further information, or if there are any questions or concerns in regard to this letter and its recommendations, please contact me at (312) 233-1135 or donald.mon@ahima.org.

Sincerely,



Donald Mon, PhD
Vice President, Practice Leadership

cc: Dan Rode, MBA, FHFMA
Jill Burrington-Brown, MS, RHIA, FAHIMA
Allison Viola, MBA, RHIA