



March 30, 2009

Department of Health and Human Services
Agency for Health Care Research and Quality
Attn: Doris Lefkowitz
AHRQ Reports Clearance Officer

Re: 74 FR 8797

The American Health Information Management Association (AHIMA) welcomes the opportunity to comment on the US Department of Health and Human Services (HHS) Agency for Health Care Research and Quality (AHRQ) agency information collection activity: proposed collection; comment request, Colorado Regional Health Information Exchange (CORHIO) – Point of Care Exchange System Evaluation: Point of Care Questionnaires and Focus Groups

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 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.

AHIMA commends AHRQ for carefully gathering and assessing input from industry stakeholders during the development of the Colorado Regional Health Information Exchange (CORHIO) – Point of Care Exchange System Evaluation: Point of Care Questionnaires and Focus Groups survey instruments. Our comments focus on those areas of particular interest to our members and we believe we have provided a thorough and comprehensive response to the proposed survey instruments which serve as a good foundation from which to begin to identify, define, and evaluate barriers to participation in local health information infrastructure. However, we have outlined some recommendations for consideration as AHRQ continues to refine the assessment instrument.

We would be happy to assist AHRQ with making any changes or modifications to the proposed survey instruments. AHIMA has a history of strongly supporting many of AHRQ's initiatives and providing our expertise in domains that reflect that knowledge area.

We would look forward to collaborating on this important effort to ensure facilities experience the most efficient and effective data collection methodologies.

General Comments

In general with regard to the questionnaire, survey, and process, all are very thorough and well-written. We concur with the decision to target emergency departments (ED) clinicians at

- University of Colorado Hospital Authority (UCH)
- Denver Health Hospital Association (DHHA)
- Kaiser Permanente – Colorado (KPCO)
- The Children’s Hospital, Denver, Colorado (TCH)

as survey participants as well as the Call Center staff because these facilities would most benefit from health information exchange. In addition the proposed sample size seems appropriate. The decision to do both a POC Questionnaire survey as well as Focus groups interview shows strength in the process.

POC Questionnaire:

AHIMA recommends that questions be included that focus in on patient identification and data management issues.

With regard to patient identification issues we recommend questions be included that address:

- The accuracy and completeness of the key demographic and clinical data.
- The completeness (or presence of data values) in the message.
- Presentation of information. Is information presented in a readable fashion and stratified in importance to allow optimal use of time available.
- The timeliness of data updates. Is all information continually updated to allow modification of management, treatment
- The retention of data

With regard to data management issues we recommend questions be included that address:

- Accuracy – Data is valid, contains the correct values, and is attached to the correct patient.
- Accessibility – Data is easily obtainable
- Comprehensiveness – All required data items are included
- Currency – The data should be up to date
- Consistency – The value of the data should be reliable and the same across applications
- Definition – Clear standardized definitions should be provided

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- Granularity – Attributes and values of data should be defined at the correct level of detail
- Precision – Data values should be large enough to support the application or process
- Relevancy – The data are meaningful to the performance of the process or application for which they are collected
- Timeliness – Timeliness is determined by how the data is being used and their context

Emergency Department Focus Group Guide:

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Call Center Focus Group Guide:

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If AHIMA can provide any further information, or if there are any questions regarding this letter and its recommendations, please contact AHIMA's Director of Practice Leadership, Harry Rhodes, MBA, RHIA, CHPS, CPHIMS, FAHIMA (312) 233- 1119 or harry.rhodes@ahima.org, or me at (202) 6599440 or dan.rode@ahima.org.

Sincerely,



Dan Rode, MBA, FHFMA
Vice President, Policy and Government Relations

cc: Harry Rhodes, MBA, RHIA, CHPS, CPHIMS, FAHIMA
Allison Viola, MBA, RHIA