American Health Information Management Association (AHIMA)

**Conducting Public Comments on AHIMA Standards – a Handbook**

AHIMA Information Governance (IG) Initiative has been driving the adoption of effectual health information management (HIM) practices in an electronic environment. Standardization of IG organizational policies, procedures, operations and personnel training are becoming critical to the safe, effective and efficient electronic information sharing.

The AHIMA Standards Team has been facilitating the development of IG practice standards by working with HIM subject matter experts, members of the AHIMA Standards Task Force. Specific examples of AHIMA standards include but not limited to the following:

1. Specifications of HIM business requirements
2. Specifications of HIM practices checklists
3. Specifications of HIM practice use cases
4. Standardized case definitions templates and

This handbook describes a process for conducting public review of AHIMA IG practice standards.

Definitions

*Public Comment* is the process for soliciting comments (revisions, additions, deletions) from a broad audience of stakeholders, impacted by a specific standard, on the content and format of the standard developed by the AHIMA.

The *Target Audience for Public Comment* consists of stakeholders involved in generation, management, protection, use and re-use of electronic health information. Stakeholders to be engaged in the public comment process should include but not limited to the following:

* AHIMA members
* Members of professional entities representing health information users (clinicians, public health professionals, researchers, educators and others)
* Members of professional entities representing health information technology (HIT) vendors
* Standards development organizations (SDOs) and
* Entities representing consumers (patients, caregivers and others).

The specific target audience for the public comment on a specific AHIMA standard is defined by the AHIMA Standards Task Force on a case by case basis.

The *Public Comment Period* is the time that the standard is undergoing the public comment. The public comment period shall be no more than 45 days.  During this period, the draft standard is submitted for comment to identified stakeholders outside the AHIMA Standards Task Force.

Why Implementing Public Comment on AHIMA Standards

The public comment is a necessary component of the standard development process required by standards development organizations (SDOs) governed by the American National Standards Institute (Clause B5. Criteria of Operation; Sub-clauses B5.2 Listing in Standards Actions and B5.3 Consideration of Views and Objections).[[1]](#footnote-1) The public comment process assures:

* quality of a standard by addressing perspectives of interested parties
* collaborative environments for developing standards that are needed by the healthcare sector
* open consensus-based process for developing standards
* transparency of the standards-development process and
* ease of standards adoption.

Public Comment is a necessary step of validating a standard under development because it provides an opportunity to engage all interested stakeholders to contribute to the proposed standard prior to formal publication.

AHIMA Involvement in the Public Comments on Standards

For some time, AHIMA has been invited to participate in the public comment process of various SDOs, including Heath Level Seven (HL7), Integrating the Healthcare Enterprise (IHE), International Organization of Standardization (ISO), and others. In 2015, AHIMA facilitated the IHE public comment process for the AHIMA-IHE White Paper “HIT Standards for HIM Practices”.[[2]](#footnote-2) In addition, AHIMA has also been participating in the public comment process facilitated by various federal agencies, including the Office of National Coordinator for HIT (ONC).[[3]](#footnote-3)

AHIMA Intellectual Property (IP)

To protect AHIMA IP, the statement below will be added to the standard document, the subject of public comments:

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The statement below will be added to the standard document, the subject of public comments:

This specification is to be used, as is, without warranty of any kind, either expressed or implied. While every precaution has been taken in the preparation of this specification, AHIMA assumes no responsibility for errors or omissions. Neither is any liability assumed for damages resulting from the use of the information or instructions contained herein. It is further stated that AHIMA is not responsible for any damage or loss to your data or your equipment that results directly or indirectly from your use of this specification.

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Public Comment Process in Developing AHIMA Standard

The following process, including public comment process, will be executed when developing AHIMA standard:

1. **Developing a Draft Standard**:

1. AHIMA standards are developed by the AHIMA Standards Task Force of subject matter experts (SMEs) – volunteers – in an open, consensus-based process
2. The AHIMA Standards Team facilitates the AHIMA Standards Task Force to develop standards. This includes:
   1. drafting initial standard
   2. facilitating the review of the draft standard by the AHIMA Standards Task Force members via regular conference calls/webinars
   3. preparing presentations and publications about the draft standard to recruit SMEs in AHIMA media, e.g., conventions, conferences and other venues as well as JAHIMA, e-Alert, web-site and other publications, correspondently
   4. maintaining the standards development wiki pages for collaboration of the AHIMA Standards Task Force members and sharing documentation.

2. **Preparing Draft Standard for Public Comment:**

1. AHIMA Standards Task Force approves the draft standard for public comment and defines the target audience for the public comment, i.e., the affected stakeholders.
2. AHIMA Standards Team facilitates preparation of the draft standard for public comment. This includes
   1. technical and editorial review of the draft standard
   2. selection of AHIMA media channels appropriate for the chosen target audience
   3. development of the public comment announcements with instructions for submitting comments. ***Appendix 1*** provides example of the announcement of public comments launch for AHIMA standard.
   4. posting the draft standard and comments collection instruments, e.g., comment collection form, at the AHIMA web-site for access by the target audience. ***Appendix 2*** presents the Public Comment Collection Form for AHIMA Standard.

3. **Administering the Public Comment:**

1. AHIMA Standards Team collects comments via collection instruments (***Appendices 1 and 2***) and incorporates all comments in a Master Comment Worksheet. ***Appendix 3*** presents the Master Comment Worksheet for AHIMA Standard.
2. The worksheet with all comments is posted at the project wiki pages in preparation for the comment reconciliation.

4. **Conducting Comment Reconciliation:**

1. AHIMA Standards Team facilitates regular conference calls of the AHIMA Standards Task Force to conduct comment reconciliation via the open and transparent consensus-based process.
2. Authors of comments are invited to the calls to review their comments.
3. Each comment is reviewed. The result of reconciliation of each comment is recorded in the worksheet using the following scale:
   1. *Accepted =* proposed revisions were accepted as is
   2. *Accepted with modification =* proposed revisions were modified when incorporated in the standard
   3. *Rejected =* proposed revision was not accepted.
4. AHIMA Standards Team updates the worksheet and draft standard according with the outcomes of the comment reconciliation
5. The updated standard and the worksheet with resolved comments are posted at the project wiki pages after each call for review by the AHIMA Standards Task Force members.

5. **Publishing Standard:**

1. AHIMA Standards Team facilitates preparation of the final standard updated based on the results of the public comment reconciliation. This includes
   1. editorial review of the final standard
   2. posting of the new standard at the AHIMA web-site
   3. launching the outreach regarding the newly published standard via various AHIMA communication channels.

**Appendix 1. Announcement of Public Comments Launch for AHIMA Standard**

*Distributed via e-mail to the selected listserv(s)*

**Date**: Month/Day/Year

**Subject**: AHIMA Standard – Public Comment Period: Submit Your Comments by **Month/Day/Year**

Dear Colleagues:

American Health Information Management Association (AHIMA) invites you to participate in the public comment for the AHIMA standard entitled <*Standard Name*>.

The due date for the public comments submission is **Month/Day/Year**

Please click here to download the **Standard**.

Please click here to download the **Public Comment Form**. The form contains instructions for recording and submitting your comments.

Please submit the completed Form as an email attachment to *XXXX@ahima.org.*

Thank you for your contribution in developing standards for HIM practices.

Sincerely,

AHIMA Staff Member Name, Credentials

AHIMA Staff Member Position

AHIMA Staff Member Contact Information

**Appendix 2. Public Comment Collection Form for AHIMA Standard**

*This form will be maintained as an excel spreadsheet.*

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Public Comment Collection Form for AHIMA Standard** | | | | | | |
| **Standard Name:** | | | | | | |
| **Public Comment Period:**  *MM/DD/Year - MM/DD/Year* | | | | **Deadline Date:** *MM/DD/Year* | | |
| **Save Form as** *StandardName\_LastName\_Comments\_Date* | | | | **Submit Form to** *XXXX@*ahima.org | | |
| **Reviewer Information** | | | | | | |
| **Name:** | | | | **Affiliation:** | | |
| **E-mail:** | | | | **Phone:** | | |
| Instructions for Reviewer (Submitter of Public Comment)  1. Download standard at *http://..............................*  2. Enter Section Name and Line # from the draft standard for every comment. For general comments, enter NA (not applicable) in both Section Name and Line #.  3. Paste the existing wording from the standard that is the subject of comment.  4. Briefly describe the reason for comment.  5. Propose exact wording to change the text of the standard.  6. Provide any additional information as needed as notes  After completing the form, save itas*StandardName\_LastName\_Comments\_Date* and send as an email attachment to *XXXX@ahima.org.* | | | | | | |
| **Section** | **Line #** | **Existing Wording** | **Reason for Comment (***editorial, content, other***)** | | **Proposed Wording** | **Notes** |
|  |  |  |  | |  |  |
|  |  |  |  | |  |  |

**Appendix 3. Master Worksheet: Public Comment for AHIMA Standard**

*This form will be maintained as an excel spreadsheet.*

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Master Public Comment Worksheet for AHIMA Standard** | | | | | | | | |
| **Standard Name:** | | | | | | | | |
| **Public Comment Period:**  *MM/DD/Year - MM/DD/Year* | | | | | | | | |
| Instructions for Facilitator:  1. Consolidate all comments in the master worksheet.  2. Conduct review of every comment with the AHIMA Task Force members via conference calls.  3. Invite comments’ author to the calls to present comment and get a consensus on the resolution.  4. During the call, record comment resolution outcome (accepted; accepted with modification; rejected) for each comment in the worksheet.  5. Change the text of the Standard according to the accepted comments during the call.  6. Post comment reconciliation documentation (worksheet and updated Standard) on the project wiki after each call for review by the AHIMA Task Force members. | | | | | | | | |
| **Comment #** | **Reviewer: Name & Affiliation** | **Section** | **Line #** | **Existing Wording** | **Reason for Comment (***editorial: content; other***)** | **Proposed Wording** | **Resolution**  **(***accepted; accepted with modification; rejected***)** | **Notes** |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

1. American National Standards Institute (ANSI). ANSI Procedures for U.S. Participation in the International Standards Activities of ISO. 2016. p.29 [↑](#footnote-ref-1)
2. Integrating the Healthcare Enterprise (IHE). Information Technology Infrastructure (ITI) Technical Framework. HIT Standards for HIM Practices. White Paper. URL: <http://qrs.ly/lb4vec0> [↑](#footnote-ref-2)
3. American Health Information Management Association (AHIMA) Comments on the Connecting Health and Care for the Nation: A Shared Nationwide Interoperability Roadmap DRAFT Version 1.0 (ONC Interoperability Roadmap), April 3, 2015. URL: <http://bok.ahima.org/PdfView?oid=300817> [↑](#footnote-ref-3)