



**AHIC SUCCESSOR, INC. DRAFT PROCESS FOR ESTABLISHING NATIONWIDE  
HEALTH INFORMATION TECHNOLOGIES PRIORITIES  
COMMENTS FROM THE CONSUMER PARTNERSHIP FOR eHEALTH**

The Consumer Partnership for eHealth, a coalition of consumer, patient, and labor organizations, has been advocating over the last several years for more meaningful consumer participation in the shaping of HIT standards and policy to ensure that they truly benefit patients and consumers. Several of our members have been involved in the original AHIC and in the Successor organization development process.

We are concerned about the proposed prioritization process for future interoperability initiatives, primarily because it is designed to be a “pay to play” process. Such a process makes it less likely that the priorities of consumers and patients, especially those of underserved populations, will receive the appropriate emphasis. As you know, the National Quality Forum, which has recently sought and received public funding, struggled under a similar model to establish a national strategy for health care quality measurement and reporting which ensures resources are being focused on “high leverage” areas. However, we are encouraged that the Board recognizes that prioritized value cases that are un-funded through the pay-to-play process need to have some other source of funding. We strongly encourage the Board to identify a reliable source of funds for the proposed scholarship-like fund to ensure that consumer-oriented priorities are acted on in a timely way. If a separate funding source is not identified, we feel that the stakeholders funding other value case development projects should be required to contribute a specified amount or percentage to the proposed scholarship-like fund. While we have concerns that the “pay-to-play” approach to the funding of value cases may preclude outcomes that serve the public good, the scholarship fund could be a partial solution.

We are also encouraged by the fact that ultimately value cases are prioritized by the AHIC Successor Board of Directors, which includes two consumer representatives. Our utmost concern is that the promotion of health information technology adoption and health information exchange be carried out in ways that benefit consumers and patients, both directly and indirectly. Policies, standards and certification criteria should support:

- Quality improvement and public reporting;
- Patient and family engagement and self-management of chronic conditions;
- Consumer and patient access to their own information, including the portability of that information;
- Reductions in health disparities;
- Privacy of personal health information;
- Providing some consumer choice over how their information is used and disclosed;
- Other purposes that serve the public good.

Therefore, we strongly urge you to ensure that consistent, adequate funding is available to support value cases that serve the public good.

If you have any questions about these comments, please contact Eva Powell at the National Partnership for Women & Families at [epowell@nationalpartnership.org](mailto:epowell@nationalpartnership.org).

Sincerely,  
Members of the Consumer Partnership for eHealth

AARP  
AFL-CIO  
Center for Democracy and Technology  
Consumers Union  
Department for Professional Employees, AFL-CIO  
Health Care For All  
National Consumers League  
National Partnership for Women & Families

For more information on the Consumer Partnership for eHealth go to  
[www.nationalpartnership.org/hit](http://www.nationalpartnership.org/hit).