

March 20, 2023

The Honorable Bernard Sanders
Chair
Health, Education, Labor, and Pensions
Committee
US Senate
332 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bill Cassidy, M.D.
Ranking Member
Health, Education, Labor, and Pensions
Committee
US Senate
455 Dirksen Senate Office Building
Washington, DC 20510

RE: Response to Request for Information on Drivers of Healthcare Workforce Shortages and Solutions

Submitted via email to HealthWorkforceComments@help.senate.gov

Dear Chairman Sanders and Ranking Member Cassidy:

Thank you for the opportunity to provide feedback on the drivers of the healthcare workforce shortages and potential solutions. The pandemic exacerbated many challenges with the healthcare workforce in the US, and now is the time to fully address the strain on the healthcare system. We applaud your continued leadership in this area.

AHIMA is a global nonprofit association of health information (HI) professionals. AHIMA represents professionals who work with health data for more than one billion patient visits each year. The AHIMA mission of empowering people to impact health drives our members and credentialed HI professionals to ensure that health information is accurate, complete, and available to patients and clinicians. Our leaders work at the intersection of healthcare, technology, and business, and are found in data integrity and information privacy job functions worldwide. AHIMA members also bring the expertise and knowledge around health information and data that is necessary to inform investments in our healthcare system.

We appreciate the commitment to addressing challenges associated with the workforce in our healthcare system. As the healthcare ecosystem becomes increasingly interoperable, we must ensure that the healthcare workforce is viewed holistically to include operational staff that are vital to the safety of patients, the privacy and security of their health information, and the maintenance of the revenue cycle in healthcare which supports over 3.7 billion claims per year.¹ This includes health

¹ Available at: <https://www.caqh.org/sites/default/files/2022-caqh-index-report%20FINAL%20SPREAD%20VERSION.pdf>.

information professionals. AHIMA offers the following feedback in response to the Request for Information.

The Health Information Profession

Health information (HI) professionals fill a wide range of roles within the healthcare system to ensure patient health information is complete, accurate, timely, and secure. HI professionals work in a number of areas, including:

- **Privacy, Risk, and Compliance:** Positions within the privacy, risk, and compliance sector ensure regulatory compliance for healthcare organizations and ensure patient safety, including overseeing compliance with the Health Insurance Portability and Accountability Act (HIPAA). Jobs may include Compliance Managers, Privacy Analysts and Privacy Officers, and Directors of Health Information Management.
- **Data Quality:** Patient health information must be complete, accurate, and timely to reflect the full scope of services and to ensure that all parties involved in the health ecosystem – patients, providers, and payers, are able to make the best decisions with regard to the patient’s health. Data quality jobs include Clinical Documentation Improvement (CDI) Quality Assurance Auditors, Coding Auditors and Educators, medical coders, Master Patient Index Specialists, and Disease Registry Registrars.
- **Data Analytics:** Data analytics in healthcare analyzes health information to predict trends, manage spread of diseases, improve clinical decision-making, and improve patient outcomes. Data analytics jobs include Clinical Researchers, Clinical Data Managers, and Health Data Analysts.
- **Informatics:** Healthcare informatics combines health data with technology to improve patient treatment and outcomes. Informatics jobs include Data Quality Analysts, Clinical Data Specialist, Health Informatics Specialists, and Clinical Data Developers.
- **Revenue Cycle Management:** The Revenue Cycle Management sector oversees billing, reimbursement, customer service, and medical coding. Revenue Cycle Management jobs include Directors of Revenue Cycle Management, Revenue Integrity Specialists and Analysts, Chargemaster Analysts, and Medical Billers and Coders.
- **Consumer Health Information:** Consumer health information jobs involve working in patient services by supporting patient-facing administrative tasks, navigating health and social services for patients, and interfacing with diverse agencies to ensure optimal patient care is provided. Jobs may include Patient Service Representatives, Community Health Workers, Patient Navigators, and Medical Records Clerks.

Shortages within the Health Information Profession

As with many healthcare sectors, the COVID-19 pandemic contributed to shortages already growing within the profession. One of the main drivers of the HI professional shortages is remote work tied to geography. While remote work is a benefit to many HI professionals and is essential to ensure a healthcare organization is able to retain employees, remote work has created an environment where healthcare organizations in high cost of living areas can afford to pay more, even to professionals located in rural or low cost of living areas. This leaves rural and underserved hospitals and health systems unable to compete with pay, causing worker shortages within the entities least able to afford those shortages. These shortages also extend to the HI workforce in federal, state, and local government agencies, including public health agencies.

A second driver of the HI profession's workforce shortages is a skills mismatch between some already in the workforce and available positions. As technology advances and as the complexity of state and federal regulations increases, existing training of the current workforce is not always suited to the specific needs of healthcare systems. The initial cost of education is also a barrier to many entering into the field. There is also a continual need for upskilling the profession as technology and processes become increasingly automated, requiring HI professionals to take on newer roles that involve more oversight and audit functions within their institutions.

Finally, the HI workforce is an aging workforce. Fewer are entering the workforce than will be retiring in coming years, leaving huge gaps in the health information job functions that healthcare systems require to ensure the most sensitive and vital patient health information duties are performed.

Implications of Health Information Workforce Shortages

Without the necessary job functions provided by HI professionals, the healthcare system will experience patient safety, financial, and regulatory consequences. Data quality and integrity will be compromised, potentially resulting in inaccurate documentation and reporting as well as potential errors in billing. Inaccurate reporting could also further result in poor decision-making clinically and administratively, with implications at the individual and community level. If the health system relies on poor data, it is impossible to know if programs or interventions are working, which can decrease patient safety and clinical and public health efficacy, as well as increase inefficiency and costs. Without accurate patient data, data analytics is also more challenging, which can affect reporting on disease trends and public health issues.

HI professionals are the main protectors of patient health data privacy. Shortages within the workforce could compromise privacy and security practices, leading to HIPAA violations and heighten patient distrust within health systems being able to keep their information private, confidential, and secure.

Patient safety is also compromised when there is a lack of trained HI professionals. The presence of inaccurate patient information often leads to duplicative testing and incorrect test results being tied to a patient's medical record. Shortages within the workforce may also lead to medical record requests having slower turnaround times, lengthening the time patients must wait to access clinical services.

Finally, recent regulatory requirements rely on trained HI professionals to support compliance activities. Without a fully staffed HI profession, the health system may not be able to implement some of the recent regulatory requirements, such as the 21st Century Cures Act or the Trusted Exchange Framework and Common Agreement (TEFCA), much less any forthcoming regulatory frameworks.

Solutions to the Health Information Workforce Shortages

Historically, the HI profession has traditionally been excluded from many healthcare workforce training grants and incentives, despite being integral to the healthcare ecosystem. AHIMA recommends the following to improve the shortages within the HI workforce:

- **Federally funded grants for education and training.** Congress should look to include the health information profession and its educational programs as potential recipients to existing grants or in the creation of new grants within the Department of Health and Human Services. The cost of education is a barrier to many wanting to enter the field, and the HI profession must have a

significant increase of those entering the profession in order to handle the health information needs of the US health system. Specifically, grants should be provided through the Health Resources and Services Administration (HRSA) to support training and education for health information professionals in rural and underserved areas.

- **Federally funded grants for rapid upskilling programs for HI professionals.** As technology progresses and the privacy and accuracy of patient health information becomes more complex, the health ecosystem needs to ensure that the HI workforce is in place to handle these complex patient health information transactions. The creation of federally funded rapid upskilling programs for the current HI workforce would help ensure that the workforce is appropriately trained as they advance throughout their careers.
- **Federal incentives to work in rural, underserved, and critical access hospitals and health systems.** Rural, underserved, and critical access hospitals are often unable to pay and retain HI professionals compared to hospitals and health systems in high cost of living areas, and remote work has exacerbated that issue. The creation of incentives specific to HI professionals to work in these healthcare settings would work to alleviate shortages and ensure the equity of services rendered to those in rural and underserved areas.

AHIMA thanks Chairman Sanders and Ranking Member Cassidy for their leadership in strengthening our healthcare workforce and for the opportunity to provide feedback. We look forward to working with you to ensure a healthcare system that is prepared for the workforce needs of the future. Should you or your staff have any additional questions or comments, please contact Kate McFadyen, Director, Government Affairs, at kate.mcfadyen@ahima.org or (202) 480-6058.

Sincerely,



Lauren Riplinger
Chief Public Policy & Impact Officer