



## **Alliance for Nursing Informatics (ANI) Prioritization and Procedures for Obtaining and Integrating Health Policy Comments**

The Alliance for Nursing Informatics, hereinafter referred to as ANI, is a collaboration of organizations that represent a unified voice for nursing informatics. ANI provides the synergy and structure needed to advance the efforts of nursing informatics professionals in improving the delivery of patient care.

ANI aims to foster further development of a united voice for nursing informatics and provide a forum for its expression. Further, ANI provides a forum to respond to opportunities that support and encourage nursing informatics participation in activities such as: Developing resources, guidelines and standards for nursing informatics practice, education, scope of practice, research, certification, public policy, terminology, best practice guidelines, advocacy, networking and career services.


The goal of this policy is to describe a procedure for ANI member organizations to achieve consensus on policy issues affecting nursing informatics.

**Policy:** ANI, as a collaboration that represents multiple nursing informatics organizations, responds as one voice to federal health policy initiatives by sharing nursing informatics perspectives for shaping health policy.

Due to limited timing to respond, it is not always possible to have a full review by all members within each of the ANI member organizations. ANI will make every effort to provide notification about its intent to respond to a call for comments for healthcare reform initiatives, requirements and rulings from the Office of the National Coordinator and other organizations, as soon as ANI decides to pursue a specific call. The length of time available to respond will determine the steps in the procedure for obtaining comments.

### **Procedure:**

1. The ANI Steering Committee will determine whether or not to respond to specific calls for comments related to healthcare reform initiatives, requirements and rulings from the Office of the National Coordinator (and other applicable organizations).
2. The ANI Steering Committee will request 1-3 individuals from current member organizations to serve on the Response Task Force and begin a draft of comments.
3. Simultaneously, ANI co-chairs and/or staff liaisons will notify all member organizations of the call for comments. The member organizations are then invited to review the call for comments and gather information from their members. ANI co-chairs and/or staff liaisons will request a response from member organizations in any of the following ways:

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- a. Member organizations can immediately notify their members and request them to review the healthcare reform initiatives, requirements and/or rulings.
  - b. ANI co-chairs/staff liaisons will submit an initial draft response from the Response Task Force and ask members to submit comments to ANI member organizations.
  - c. ANI will submit the draft with as much time as possible for member organizations to respond.
  - d. ANI Governing Directors are responsible for compiling and submitting all of the feedback from their respective organization to the ANI staff liaisons/Response Task Force.
  - e. The ANI Meaningful Use Response Task Force created a Public Comment Methodology which has been provided as an example below. Each future Task Force is welcome to use this methodology, but it is not required.
  - f. ANI staff liaisons/Response Task Force will submit the integrated document that includes member comments no later than 48 hours prior to the final federal deadline, if time permits.
  - g. ANI staff liaisons/Response Task Force will disposition all comments and document their resolutions.
  - h. If there are significant controversial points, ANI will include a minority report that indicates there are several opinions.
  - i. Any member organization or individual may request a full dispositioning of the comments.
4. The statement must be affirmed by a simple majority of the ANI member organizations.
  5. The ANI co-chairs will approve and sign the final statement for submission.
  6. Upon submission of the final statement it will be circulated to the ANI Governing Directors and posted on the ANI website.



# Public Comment Methodology

Created by Mark Sugrue RN-BC – with special acknowledgement to Jonathan Evans MA, BSN, RN, Mary Kennedy RN, MS & Rosemary Kennedy MBA, RN, FAAN for their contributions.

	Identify & Monitor Response Opportunities	Assemble Response Leadership	Draft Initial Response	Solicit Membership Feedback	Finalize, Approve & Submit	Evaluate
What	Identify target organizations to monitor  Monitor for opportunity to respond	Identify organizational Champions  Confirm organizational alignment  Meet to discuss Response Themes  Identify Response Task Force	Response Task Force Drafts initial response  Review with Leadership Team  Approve Draft Response	Develop Response Approach, Plan & Tools  Communicate Response Plan with Membership  Begin Response Period and Track Comments  Disposition of comments  Resolution of Comments	Communicate Final Response to Members      Response Task Force Leadership Team	Was response accepted? Were suggested changes incorporated? What worked well? What did not? Is there opportunity for additional response? Communicate results to membership
Who	All Encourage <i>all</i> members to watch for opportunities ANI Steering Committee ANI co-chairs ANI staff liaisons	ANI Steering Committee ANI co-chairs ANI staff liaisons	Response Task Force ANI Steering Committee ANI co-chairs ANI staff liaisons	Response Task Force ANI Steering Committee ANI co-chairs ANI staff liaisons	Response Task Force ANI Steering Committee ANI co-chairs ANI staff liaisons	Response Task Force ANI Steering Committee ANI co-chairs ANI staff liaisons
When	Continuous	Upon Post for Public Comment	Within 2 Weeks of Posting	(Posted Comment Period Deadline) - (2-4 Weeks)	On or before Comment Period Deadline	After Comment Period



<b>How</b>	Internet Target Organization Web Sites Federal Register	Teleconference	Teleconference Response Tracking Worksheet	Email Response Tracking Worksheet	Email Teleconference/Web Conference	Email Teleconference
<b>Deliverables</b>	Original Document for Public Comment Critical Path Document	Organizational Commitment to Respond Revised Original Document with Line Numbers for Tracking (If Needed)	Initial Draft Response	Revised Draft with Member input Disposition of Comments Document	Final Response Membership Communication	Lessons Learned/Best Practices

EXAMPLE