



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 to 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 individuals 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 following procedure for obtaining comments.

Procedure:

1. The ANI Policy Coordinator will notify the ANI Steering Committee with a request to respond to a specific call for comments related to policy initiatives, requirements, regulations, and/or rulings from the Office of the National Coordinator (and other applicable organizations).
2. The ANI Steering Committee members will respond to this request in a timely way (24-48 hrs), with a recommendation as to whether or not ANI should respond to the call for comments.
3. If an affirmative response is received, the ANI Policy Coordinator will request 1-3 individuals from ANI member organizations to serve on the Response Task Force and begin a draft of comments.



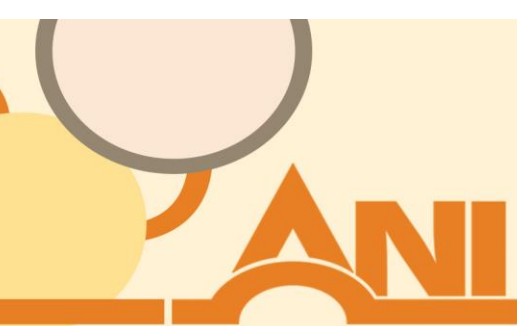
4. After the ANI draft response has been developed, ANI co-chairs and/or staff liaisons will notify all member organizations of the call for comments. The member organizations are then invited to review the call for comments and gather information from their members. ANI co-chairs and/or staff liaisons may request a response from member organizations in any of the following ways:
 - a. Member organizations should immediately notify their members and request them to review the policy initiative, requirements, regulations, and/or rulings.
 - b. The ANI Policy Coordinator will submit an initial draft response from the Response Task Force and ask ANI 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 submitting all of the feedback from their respective organization to the ANI Policy Coordinator/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 Response Task Force may use this methodology, but it is not required.
 - f. The ANI Policy Coordinator/Response Task Force will submit the integrated comments document no later than 48 hours prior to the final federal deadline, if time permits.
 - g. The ANI Policy Coordinator/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 membership organization or individual may request a full dispositioning of the comments.
5. The statement must be affirmed by a simple majority of the ANI member organizations who vote on that particular response.
6. The ANI co-chairs will approve and sign the final comments document for submission.
7. Upon submission of the final comments document it will be circulated to the ANI Governing Directors and posted on the ANI website.



Public Comment Methodology - EXAMPLE

Created by Mark Sugrue RN-BC – with special acknowledgement to Jonathan Evans MA, BSN, RN & 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	Communicate Final Response to Members	Was response accepted? Were suggested changes incorporated? What worked well? What did not? Is there opportunity for additional response? Was there media coverage of the response? Communicate results to members
Who	ANI Governing Directors ANI Policy Coordinator ANI Steering Committee ANI Co-chairs ANI staff liaisons	ANI Policy Coordinator Steering Committee ANI Co-chairs ANI staff liaisons	ANI Policy Coordinator Response Task Force ANI Steering Committee ANI Co-chairs ANI staff liaisons	ANI Policy Coordinator Response Task Force ANI members ANI staff liaisons	ANI Policy Coordinator Response Task Force ANI Steering Committee ANI Co-chairs ANI staff liaisons	ANI Policy Coordinator Response Task Force ANI Governing Directors ANI Steering Committee ANI Co-chairs ANI staff liaisons
When	Continuous	Upon Post for Public Comment	Within 2 Weeks of Post for Public Comment	2-4 Weeks before Comment Period Deadline	On or before Comment Period Deadline	After Comment Period



How	Internet Target Organization Web Sites Federal Register	Teleconference	Teleconference Response Tracking Worksheet	Email Response Tracking Worksheet	Email Teleconference/Web Conference	Email Teleconference
Deliverables	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