



ASSOCIATION
OF OCCUPATIONAL
HEALTH PROFESSIONALS
IN HEALTHCARE

January 7, 2013

Department of Health and Human Services
Office of the National Coordinator for Health Information Technology

Docket ID: HHS-OS-2012-007

Dear Sir or Madam:

The Association of Occupational Health Professionals in Healthcare (AOHP) is pleased to have the opportunity to respond to the *Request for Comment Regarding Stage 3 Definition of Meaningful Use of Electronic Health Records (EHR)*, ID# SGRP 104. Our members are occupational health providers, primarily nurses, in healthcare settings. We are most often based in hospitals or other types of healthcare facilities. Generally, we are a non-revenue generating service and often called Employee Health Services (EHS) or Occupational Health Services (OHS).

AOHP supports the inclusion of occupation and industry in the meaningful use of EHRs for the following reasons:

- Inclusion of this information enables the provider to more accurately diagnose and treat work-related health problems thereby improving the quality and efficacy of care;
- The information can be used in the formation of appropriate recovery and return-to-work plans;
- The EHR could guide the treating clinician to clinical decision support using web-based guidelines related to occupational injury/illness;
- A reduction in health disparities is possible as many immigrant/minority workers are disproportionately employed in high risk occupations and they may be more comfortable sharing their concerns with their primary care provider;
- The information could create educational opportunities for patients and families about occupational risks and prevention strategies;
- The potential for an automated, therefore, improved reporting system to public health entities would also be a positive outcome of including occupational information in the EHR and
- Promotion of healthy lifestyles and evidence-based wellness programs also exist.

AOHP is a national association with more than 1,000 members who serve as leaders in championing the vital role of occupational health professionals in healthcare today. Through their active involvement at local, state and national levels, AOHP has become the defining resource and leading advocate for occupational health and safety in healthcare, representing tens of thousands of healthcare workers throughout the nation. AOHP promotes health and safety for healthcare workers through: advocacy; occupational health education and networking opportunities; health and safety advancement through best practice and research; and partnering with other invested stakeholders.

Thank you again for the opportunity to comment on this important topic. If you have additional questions or comments, please contact MaryAnn Gruden, Association Community Liaison by email, magaohp@yahoo.com or phone 412-578-6792.

Sincerely,

A handwritten signature in black ink that reads 'Dee Tyler'.

Dee Tyler, RN COHN-S FAAOHN
Executive President