

July 8, 2009

Comments in Response to the Federal Register Notice

A 30-day Federal Register Notice was published in the *Federal Register* on May 22, 2009, vol. 74, No. 98; pp. 24012-24013. One set of comments to the Federal Register notice was received from ARMA International.

The comments from ARMA International and HHS/ONC's responses are below.

ARMA International Comments:

“It is the recommendation of ARMA that the project ...include a means to articulate and thereby allow the consumer to verify or otherwise assess that the provider has developed policies and procedures that represent the acceptance and implementation of enterprise-wide records and information management program for personal health records which are based upon *generally accepted recordkeeping principles*.”

ONC Response:

We appreciate ARMA International's interest in PHRs and consumer access to their health information. ONC seeks to identify the most important privacy and security practices PHR vendors and service providers should communicate to potential PHR users. Making such information available will provide greater transparency and allow consumers to make informed decisions (based on how their health information is protected) about selecting and using PHRs.

While we recognize the importance and benefits of recordkeeping, consumer assessment of provider policies and procedures related to recordkeeping principles are beyond the scope of the project. The focus of the project is not to establish any policies or practices, such as enterprise-wide records and information management, but rather to establish a tool to improve consumer understanding of privacy and information sharing practices of a PHR vendor so they can make informed decisions about using PHRs.